DWA Task Group on Lead
Draft Teleconference Summary
January 25, 2008

Participants

Lance Agness – Ford Meter Box – CHAIR
Jeff Baldwin – T&S Brass
Brian Bernados – CDPH
Mike Briggs – IAPMO
Nate Buzard – Viega
Bill Chapin – CASH ACME
Lisa Donahue – EPA
Pete Greiner – NSF International
David Heumann – LADWP
Sarah Kozanecki – NSF International
Lee Mercer – Moen
Tom Palkon – WQA
Rick Sakaji – East Bay MUD
Craig Selover – Masco
Richard Sykes – East Bay MUD
Steve Tefft – AY McDonald
Joe Wallace – AO Smith
Bob Weed – CDA
Kevin Wong – CWQA

S. Kozanecki read the antitrust statement and took roll call. L. Agness convened the meeting.

He asked if there were any changes to the meeting summary dated January 16, 2008. Changes were offered and S. Kozanecki agreed to update the document and post it on the standards workspace. L. Agness stated that anyone who had additional edits should send them via email to S. Kozanecki.

Review of Lead Content Proposal (Annex G)

P. Greiner gave a brief overview of the changes that had been included in v4 of the lead content proposal. Those changes included:

- Removal of the reference to the 1986 update of the SDWA per Jeff Kempic's suggestion;
- Addition of a paragraph in G.4 identifying how lead, when reported as a potential contaminant in a material rather than an intentional additive, should be used in the weighted average lead content calculation;
- Addition of "sealed with a permanent barrier" to the section on use of liners (G.4.1);
- Added the durability evaluation approach previously submitted by C. Selover (G.6);
- Narrow of scope of the coating durability evaluation protocol to section 9 products and in-line devices with nominal IDs < ¾"(G.6);
- Placeholder added for "other devices" under the coating durability section (G.6.2) with a note that further development is needed when a methodology is established.
- Addition of details to Table G.2 (Durability test water chemistries) as discussed previously including details from Mike Schock's water chemistry analysis.

Pete explained the addition of the paragraph in G.4 was to establish how information gathered on materials (from Sec 3.2) should be used when lead is reported as a potential impurity rather than an intentional additive. He stated that the question was raised at NSF and this was written to add clarity. He explained that the threshold value of 0.005% was chosen because this seemed to be the level where significance was lost when compared to the criteria of 0.25%. R. Sakaji suggested a different number of significant figures for the sake of consistency. The group discussed some of the differences detection limits, reporting limits, and method variability. P. Greiner explained that he was working under the assumption that this would not be based on analysis, but rather the level given on the material specification sheet for the products. He stated that it could be removed if it was not helpful. C. Selover suggested that at this level (0.005%), inclusion adds little value to the calculated value while potentially causing manufacturers to think they need to analyze for it down to this level if the value is in the standard. After discussion, the group agreed to remove the added language.

B. Bernados pointed out that some of the percent lead content values in Table G.1 are "0" and questioned whether or not sufficient significant figures have been used. C. Selover offered that in this example, it might have been a part of the faucet that was stainless steel. P. Greiner explained that the information to be entered into this table would be from information provided by the manufacturer in the formulation review process and would be used as provided. He also noted that for most non-metal material submittals, there is no intentional lead addition shown in the formulations and nothing reported as a potential lead contamination, so there is nothing to use in the calculation except "0".

P. Greiner explained that he did not make any changes to the sections on coatings or lead removal technologies as no conclusions had been made in previous calls.

B. Bernados stated that after reading the NAHB study, he had many questions. On page 9, he pointed out that the lifetime for faucets was determined to be 20 + years, and questioned what the "+" indicated. He stated that this was too vague. Twenty + years could mean much longer usage than twenty years and was concerned that the consumer be protected over the life of the product. C. Selover suggested following up with the authors to determine how data was collected in order to understand better what it is meant to represent. He stated that industry research shows that most faucets see an actual lifetime of an average of only 7 years. B. Bernados stated that he was more interested in the extreme than the average, however. He proposed the idea of incorporating a safety factor, such as that of 2, to the equation. The group discussed the issues of durability and average life of both faucets and coatings (and the implications of coatings on product life), but no conclusion was made. It was suggested that Shawn Martin contact the authors of the study to get some of the group's questions answered.

K. Wong pointed out that at this point, there is no correlation to be made between the useful life of the faucets and the durability test protocol. Until long-term data could be provided to confirm the protocol, the practical test would be based on assumptions alone. The group discussed some of the many factors that would affect life (e. g., flow rate, exposure duration, etc). P. Greiner stated that there is the ASME/CSA standard for faucets contains some protocols for evaluating coatings. Although they likely pertain to external finishes, they might be a good reference. He also stated that the group would benefit from some additional expertise in the area of coatings. K. Wong agreed to get in touch with some of his contacts that are involved on the ASME technical committee and report back to the group.

C. Selover stated that the coating durability test should use the worst-case scenario for different coating types, which might be different water chemistries depending on the coating. He stated that there still remains some question regarding whether the five waters identified by Mike Schock are still valid or if others need to be identified. P. Greiner reminded the group that extraction waters subtask group of the LTG that has developed an RFP intended to characterize water chemistries across North America (including private wells and small distribution systems) although that data would not be available soon.

B. Bernados asked if anyone had given any thought to the possibility of testing for the effects of sediment on coatings (i. e., scouring effects). The group discussed the two different scenarios: (1) local particulates from scales or other build up that may be released due to changes in water chemistries or flows, and (2) particulates from the water source itself. Discussions of previous testing done (not at NSF) noted that this can be very difficult to do since the sediment was destructive and in some cases actually destroy the pumps in the test rigs. P. Greiner posited that if test waters were too aggressive for the pumps that they are too aggressive for the coating durability test.

P. Greiner asked if it would be best to remove the specific language pertaining to the durability test protocols until they had been more thoroughly flushed out and reviewed by experts in the coatings industry. In its place would just be a note about being under development and include the key principles of intent. C. Selover also proposed developing a list of questions that need to be answered. P. Greiner assured the group that although the specifics would be left out at this point the core goals would be expressed. B. Bernados stated that he would rather maintain the draft language in this section for now. After some discussion, the group agreed to leave in the specific details but to add the note regarding the development needed since this would give everyone a better idea of what the intended approach is. After some additional discussion, there was some agreement that C. Selover's proposal for calculating the durability was headed in the right direction. It was suggested that rationale be added to the draft language, and C. Selover agreed to begin that process. P. Greiner will include the rationale in v5 if it's available.

The group then discussed lead removal technologies. L. Mercer maintained his argument that if the lead removal treatments can be proven to be effective over the life of the product, then it should be an acceptable option for meeting requirements. He stated that there was no difference between this approach and coatings. R. Sykes expressed his concern that in the proof lies the greater difficulty. He opined that if the manufacturers do not need this as an option, it did not warrant time spent on development. L. Mercer suggested that all options remain open to maximize manufacturer's choices in how to deliver safe technology.

<u>Review of Action Items</u>

- Continue attempts to recruit a participant from the California BSC. (R. Sykes, R. Sakaji, B. Bernados, M. Briggs, K. Wong, S. Martin)
- K. Wong – contact ASME technical committee members for additional information on coatings and report back to the task group.
- S. Martin – contact authors of the NAHB study regarding task group's questions on report.
- C. Selover –draft language summarizing the rationale around coating durability evaluations.
- P. Greiner – revise draft language by early next week (including C. Selover's rationale doc if available).
- All – review calendars relative to setting a date for a potential face-to-face meeting in Sacramento.

The group agreed to meet again on Friday, February 1st from 2-3:30 pm EST.