

MASCO

MASCO CORPORATION

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Comments on Location/Form of NSF 61 Annex G

We believe that Annex G needs to be part of NSF 61.

1. We disagree that it is prescriptive in a strict sense. It sets a pass/fail limit on lead content, but as a calculated average of the amount in materials that make up a product based upon their individual surfaces areas. As such, one can choose from a variety of materials for each component, including applying a barrier coating and adding additional lead free surface area to a product, as longer supply tubes, for instance.
2. At its core, the 0.25% weighted average limits available lead for leaching into drinking water to a diminimus amount. At that average level, even if there is lead present, leachate levels will fall off to near zero in a very short period of time. We agree that reduction of human exposure to lead is desirable, and from a Health Effects standpoint, and as such this does relate to an influence on health effects.
3. We have not talked to our downstream customers or inspectors who, we believe, will find it much easier to understand it they only have to look for NSF 61 rather than NSF61 and some other standard, in addition. There are already several other states with similar legislation proposed, or legislation that will lower allowable lead exposure. Both consumers and industry would be better served if those requirements were uniform.
4. We do need the California regulatory connection. But what I think can work just fine for us would be a letter from DPH to BSC that Annex G is a valid approach to certifying compliance to AB1953. Then, if Annex G is part of an NSF 61 revision, the BSC only has to accept that version of the standard, which is already in Title 24.

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