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Joint Committee on Drinking Water Additives – System Components

October 9, 2024

Proposed revision to NSF/ANSI/CAN 61 – Drinking Water System Components – Health Effects (61i191r1)

Revision 1 of NSF/ANSI/CAN 61, issue 191 is being forwarded to the Joint Committee for consideration. Please review the proposal and **submit your ballot by October 30, 2024** via the NSF Online Workspace.

Please review all ballot materials. When adding comments, please include the section number applicable to your comment and add all comments under one comment number whenever possible. If you need additional space, please use the attached blank comment template in the reference documents and upload online via the browse function.

Purpose

The proposed revision add language to allow manufacturers to claim compliance to NSF/ANSI/CAN 60 when the chemical produced by their equipment meets all the requirements of NSF/ANSI/CAN 61. The language allows this claim even though the equipment is not installed at a specific water utility.

Background

As part of the effort of the DWA task group on Chemical Generators, the group confirmed that risks of on-site chemical generation are not being addressed through chemical monitoring at the state or local jurisdiction and that the public would benefit from incorporating compliance testing into the standard.

The scope of NSF/ANSI/CAN 61 System Components includes chemical generating equipment (e.g. electrolytic chlorinators) evaluated for contaminant leaching. However, the standard does not include evaluation of the chemicals produced. Chemicals produced by chemical generators may be certified under NSF/ANSI/CAN 60 Drinking Water Treatment Chemicals once the generators are installed and operating. However, manufacturers would like to claim compliance to NSF/ANSI/CAN 60 prior to selling this equipment, rather than leaving the financial burden of certification to states or local water utilities.

If you have any questions about the technical content of the ballot, you may contact me in care of:

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[Note – the recommended changes to the standard which include the current text of the relevant section(s) indicate deletions by use of ~~strikeout~~ and additions by grey highlighting. Rationale Statements are in *italics* and only used to add clarity; these statements will NOT be in the finished publication.]

NSF/ANSI/CAN Standard
for Drinking Water Additives –

Drinking Water System Components – Health Effects

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8 Mechanical devices

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8.6 Chemical feeders and generators

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8.6.4 Chemicals Produced by Chemical Generators

In addition to evaluating the contribution of chemical contaminants from the generator to drinking water under Section 8.6, chemicals produced by chemical generators may be evaluated to the requirements of NSF/ANSI/CAN 60 at the discretion of the manufacturer. Only chemicals meeting the scope of NSF/ANSI/CAN 60 are eligible. Evaluation shall meet all requirements specified in NSF/ANSI/CAN 60 including, but not limited to:

- evaluation at a maximum use level (MUL) compliant to the tables in Sections 4, 5, 6, and 7, including evaluation of alternate feedstock chemicals,
- preparation of analytical sample per NSF/ANSI/CAN 60, Annex N-1,
- analysis for the minimum test analytes and any formulation dependent analytes,
- sample of the dosed chemical is collected from the chemical generator operating within the specifications documented in the equipment manuals.

If the produced chemical solution is compliant to NSF/ANSI/CAN 60, then the following labeling shall be applied on the chemical generator equipment, installation manual, and operating manual.

- [Produced chemical name] is compliant to NSF/ANSI/CAN 60 at or below [X] mg/L using the feedstock chemicals [list of feedstock chemical names and their strengths]. All feedstock chemicals shall be NSF/ANSI/CAN 60 certified and adhere to their certified MUL. Influent

water to the chemical generator shall meet operation manual specifications. Monitoring source water characteristics and continued quality control of the chemical produced is the responsibility of the equipment operator.

NOTE — Trade names and supplier disclosure are not required to be included in the list of feedstock chemicals and their strengths. Example list: sodium chlorite (24%) with hydrochloric acid (33%).

Rationale: Adds language to allow manufacturers to claim compliance to NSF/ANSI/CAN 60 when the chemical produced by their equipment meets all the requirements of NSF/ANSI/CAN 61. The language allows this claim even though the equipment is not installed at a specific water utility.