Item No.DWA-2006-10
(For NSF International internal use)

Joint Committee Issue Document

NOTE: An issue document may be submitted at any time – it comprises two parts: the cover sheet (this page) and a description of the issue to be submitted to the Joint Committee (following page). A separate issue form is required for each issue submitted. Issue papers include proposals for modification of a standard, information reports and (of current research, etc.). An issue paper shall be categorized as being for ACTION or for INFORMATION. Submitters should limit the Issue Paper to 1 or 2 pages – attachments detailing full recommendations or background information may be attached with supplementary information. The Chairperson of the appropriate Joint Committee will respond within 30 days of receipt of the issue document advising what steps will be taken. Any issue document intended for discussion at a Joint Committee meeting must be received at least 21 days prior to the meeting to ensure inclusion in the agenda.

Submit to:

NSF International
Attn: Standards Department
789 Dixboro Rd.
Ann Arbor, Michigan 48105

Fax: 734-827-6831
e-mail: standards@nsf.org

Submitter's contact information:

Name: Joseph F. Harrison

Company: Water Quality Association

Mailing Address: 4151 Naperville Road
City: Lisle State: IL Zip Code: 60532

Telephone Number: (630) 505-0160 E-mail: jharrison@mail.wqa.org

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature of Submitter *Signed by: Joseph F. Harrison Date: November 3, 2006

**Type written name will suffice as signature*

Please indicate if you wish the item to be considered as an action item or as an information item.

Action: YES Information:

NSF Standard(s) Impacted**: NSF/ANSI 61**

Issue Statement:

Provide a concise statement of the issue, which reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

Drinking water treatment media such as ion exchange resins and activated carbons presently lose certifications to NSF/ANSI 61 when they are regenerated or reactivated off-site. NSF has written a letter to clarify that "if a media is taken from a vessel at a water treatment plant and transported to another site and/or vessel where it is regenerated, the media is no longer NSF Certified, unless the regenerated media, the regeneration facility and the process have been evaluated as part of an NSF Certification process." There are no criteria or standards in NSF/ANSI 61 by which to certify products coming from regeneration and reactivation facilities. Some states have had to develop independent policies for off-site reactivation and regeneration of spent media.

Background:

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee.

Many water systems commonly send spent media to an off-site central facility to reactivate and regenerate the media and then repeatedly reinstall it again for treatment of the system's drinking water. The issue has recently come to a head because of regenerable media competing with throwaway media for the treatment of arsenic removals. Both NSF and the Water Quality Association are currently in the process of developing procedures to certify the regeneration of media.

Recommendation:

If action by the Joint Committee is being requested, clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of ~~strike-out~~ and additions by highlighting; e.g., reference of the issue to a Task Force for detailed consideration; etc. If recommended text changes are more than a half page, please attach a separate document.

The criteria and procedures for certification of products from media regeneration and reactivation facilities need to be developed as a joint task under the DWA Joint Committee with input from all interested parties and then adopted into NSF/ANSI 61 so that all certification organizations follow the same process.

Supplementary Materials (photographs, diagrams, reports, etc.):

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

Proposed draft criteria are as follows:

Maintaining Certification of media that is regenerated off-site shall be classified into two categories.

1. Non-commingled media that is under complete control of the supplier during the off-site regeneration process. The following criteria shall be applied to maintain certification of regenerated media that is under the control of the supplier during the off-site regeneration process. A comprehensive chain-of-custody process must be used for handling of the media to and from the service installation and the regeneration facility.

a. The facility, regeneration process, and inventory shall be under the control of the Certified company.
b. The regenerated media shall be traceable to the specific location it had been used to treat drinking water and it must be returned to that same location after it has been regenerated.
c. The chemicals and procedure used during the regeneration process must be reviewed during Facility Assessments. The chemicals shall be included on the manufacturers wetted part list and material formulation sheet. The regeneration process shall be considered part of the manufacturing process.
d. Virgin media sent to the same drinking water treatment locations that becomes exhausted and follows the same process listed in steps a-c does not have to be re-tested to the NSF/ANSI 61 criteria.
e. The Certified company shall:
    - Maintain procedures for transport of the media both before and after reactivation/regeneration (vehicles and equipment including hoses, fittings and ancillary items shall only be used for non hazardous materials and shall be properly cleaned between pickups.
    - Have procedures to ensure adequate separation of spent media being regenerated or reactivated from time of removal through the regeneration process and during storage until reinstallation. The water system's own media must be returned to it, it must be fully separated at all times from other media, and only virgin media meeting the same specifications as the original virgin media can be used to make up the original volume.
    - The Certified company's quality control program shall include continuous activity testing to insure quality uniformity throughout the regeneration or reactivation process.
f. Facility assessment audits of the reactivation/regeneration facility must be conducted no less frequently than annually to ensure that the operation is in strict compliance with these criteria and procedures.

2. For commingled media that is under complete control of the supplier during the off-site regeneration process that has been combined with identical media collected from different drinking water treatment locations:
    a. The facility, regeneration process, and inventory shall be under the control of the Certified company.
    b. The chemicals and procedures used during the regeneration process must be reviewed during Facility Assessments. The chemicals shall be included on the manufacturers wetted part list and material formulation sheet. The regeneration/reactivation process shall be considered part of the manufacturing process.
    c. The Certified company shall:
        - Maintain procedures for transport of the media both before and after reactivation/regeneration (vehicles and equipment including hoses, fittings and ancillary items shall only be used for non hazardous materials and shall be properly cleaned between pickups.
        - Have procedures to ensure adequate separation of spent media being regenerated from time of removal through the regeneration process and during storage until reinstallation.
        - The Certified company's quality control program shall include continuous activity testing to insure quality uniformity throughout the regeneration process.
    d. Quality Control testing shall be performed on each lot of regenerated media.
    e. Complete NSF/ANSI 61 extraction testing of the media shall be conducted annually.
    f. Facility assessment audits of the reactivation/regeneration facility must be conducted no less frequently than annually to ensure that the operation is in strict compliance with these criteria and procedures.

Submitter: Signed by: Joseph F. Harrison Date: November 3, 2006