



INTERNATIONAL ASSOCIATION OF PLUMBING AND MECHANICAL OFFICIALS

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February 12, 2020

Mr. David Ross
Assistant Administrator
Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Attn: Docket ID No. EPA-HQ-OW-2017-0300

Dear Assistant Administrator Ross:

The International Association of Plumbing and Mechanical Officials is pleased to provide the following comments on the Lead and Copper Proposed Rule.

Background

The International Association of Plumbing and Mechanical Officials (The IAPMO Group) is a 90-year-old trade association that focuses its comprehensive services on the technical aspects of the plumbing, water treatment and mechanical industries. We focus where people come in contact with water and sanitation.

The IAPMO Group is comprised of 13 different business units with offices and staff in 11 countries. Our membership includes trained labor and contractors, engineers, product manufacturers, suppliers, plumbing and mechanical inspectors, and building officials. As a global leader, IAPMO has assisted with the development of standards, skills training, and conformity assessment services in regions around the world.

Ensuring the integrity and quality of products used in America's drinking water systems, including lead-free plumbing components and water filters, is an integral part of IAPMO's mission. As such, IAPMO operates product testing and certification laboratories in countries such as the United States, China, Australia, Indonesia, and India.

IAPMO also plays an important role as a standards-developing organization in the U.S. plumbing industry. The American National Standards Institute (ANSI) is an administrator and coordinator of the United States private sector voluntary standardization system. ANSI's faith in IAPMO standards development processes and its commitment to openness, balance of interests, and transparency has earned its recognition as an Audited Designator. An Audited Designator is an ANSI-Accredited Standards Developer to whom the ANSI Executive Standards Council has granted the authority to designate their standards as American National Standards without such standards being reviewed and approved by the ANSI Board of Standards Review.

Proposed Changes:

IAPMO supports the Administration's effort to tackle the growing challenges presented by lead in drinking water. As it works to finalize this important rulemaking, IAPMO proposes the following changes:

Administrative Requirements (VIII Administrative Requirements, J. National Technology Transfer and Advancement Act of 2015)

IAPMO applauds EPA's recognition of the importance of the National Technology Transfer and Advancement Act of 2015 and its recognition of how important it is that the Federal government use voluntary consensus standards that meet ANSI's Essential Requirements. It is important to clarify that ANSI does not itself develop standards. Rather, it accredits standards developing organizations (such as IAPMO) to develop American National Standards using the principles of consensus, transparency, due process, and openness. IAPMO recommends the following language be used to more accurately reflect how standards are developed and used consistent to the NTTAA and OMB Circular A119. "The EPA's approved monitoring and sampling protocols generally include voluntary consensus standards accredited by the American National Standards Institute (ANSI) wherever the EPA deems these methodologies appropriate for compliance monitoring."

Point-of-Use Water Filters (§ 141.93):

IAPMO supports the ability for small water systems and non-transient non-community water systems to elect to use the point-of-use device compliance flexibility option. However, we note that water quality is only improved in these situations when quality components are utilized and are properly installed and maintained. IAPMO recommends that the rule make technical corrections related to this section to specify that point-of-use water filters meet specific voluntary consensus standards accredited by the American National Standards Institute (ANSI) including *NSF/ANSI 53: Drinking Water Treatment Units – Health Effects* and *NSF/ANSI 58: Reverse Osmosis Drinking Water Treatment Systems*. In addition to these two NSF/ANSI standards, IAPMO recommends that language be included to allow for new ANSI-accredited standards that may be published in the future covering other point-of-use technologies that reduce lead from drinking water.

IAPMO further recommends that EPA clarify to require that these filters be tested and certified to meet these voluntary consensus standards by an independent, third-party product certification body accredited by ANSI to ensure the necessary contaminant reduction, material safety, structural integrity, product labeling and literature.

Pitcher Filters

IAPMO supports the use of point-of-use certified water filters to protect homes impacted by leader service line disturbances. In the proposed revisions, EPA will require systems to provide pitcher filters certified to remove lead. IAPMO supports changes that require these pitcher filters to meet ANSI-accredited standards and that they be tested by an independent, third-party product certification body accredited by ANSI.

IAPMO recognizes that there are other filter (point-of use and point-of-entry) technologies that can work in these situations. These other technologies also meet the related performance

standards and testing/certification requirements. IAPMO proposes that EPA give water systems the flexibility necessary to decide which certified filter technology will best address the needs of the situation. For example, IAPMO recognizes that consumer may want to remove contaminants such as lead and copper from all the water entering their home. For this reason, IAPMO has published the *ASSE 1087 Commercial and Food Service Water Treatment Equipment Utilizing Drinking Water* American National Standard and the ASSE LEC 2006 Point of Entry Reverse Osmosis Systems standard.

Conclusion

IAPMO appreciates the opportunity to comment on this important proposed rule and stands ready to assist you as work to finalize the rule. Please do not hesitate to contact me if you require additional information by phone at (202) 445-1198 or via email at Christopher.Lindsay@IAPMO.org.

Kind regards,

A handwritten signature in blue ink that reads "Christopher Lindsay". The signature is written in a cursive, flowing style.

Christopher Lindsay
Senior Director
Government Relations
The IAPMO Group