**From:** 2023wetc@kavi.iapmo.org on behalf of Taylor Duran
**To:** 2023wetc@kavi.iapmo.org
**Subject:** [EXTERNAL][2023wetc] 2023 WEStand ROC Second Circulation of Comments
**Date:** Wednesday, June 28, 2023 12:41:35 PM
**Attachments:** image001.png
image002.png
image003.png
2023 WEStand ROC Second Circulation of Comments.pdf

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Dear WE•Stand Technical Committee Members,

In accordance with Section 5.6 of the Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard, I have attached the additional negative comments received after the recirculation period to allow the committee the opportunity to review the comments.

The ballot material for the subject documentation is now available on KAVI.

The additional negatives received are for Item #016 Comment 01, Item #046 Comment 01, Item #047 Comment 01, Item #079 Comment 03, Item #113 Comment 01, Item #118 Comment 01, Item #124 Comment 01, Item #125 Comment 01, Item #126 Comment 01, Item #127 Comment 01, Item #132 Comment 01, Item #133 Comment 01, and Item #133 Comment 02. Therefore, these items will be reopened to allow the committee the opportunity to review the comments.

**If you do not wish to change your vote, no action is required.**

However, if you wish to change your vote after review of comments, you may do so by **Monday, July 3, 2023, at 5:00 PM (PT)**. Any affirmative voters can change their vote.

Thank you for your willingness to serve on this committee.

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# 2023 WE•Stand ROC Second Circulation of Comments

| Ballot Name: | Item # 016 Comment 01 | |
|---|---|---|
| **Voter Name** | **Vote** | **Comments** |
| Kendzel, Jim | NEGATIVE W/COMMENT | The amended definition of "dry toilet" still raises concerns about the definition not being correct as noted by Dave Mann during the meeting and also inadvertently excludes some types of "dry toilets" as noted in John Lansing's negative vote. |
| Lansing, John | NEGATIVE W/COMMENT | There are some composter arrangements that use a small quantity of water and therefore cannot fully meet the definition of a dry toilet. |

| Ballot Name: | Item # 046 Comment 01 | |
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| **Voter Name** | **Vote** | **Comments** |
| Lansing, John | AFFIRMATIVE | Zero leakage is a reasonable bar to be met when testing a new tub faucet. Even in effort to quantify zero, 0.01 gpm is too high, equal to 10 fluid ounces for a typical 8-minute shower. |
| Kendzel, Jim | NEGATIVE W/COMMENT | Voting negative is in support of accepting Comment #1 and is based on the negative comment already submitted by Kyle Thompson and also the affirmative comment submitted by Dave Mann. |
| Thompson, Kyle | NEGATIVE W/COMMENT | The existing text in this section specifies a performance requirement of "zero leakage" without providing a means by which a product can demonstrate such performance.<br><br>This proposed revision addresses these limitations by including a small maximum leakage rate and a reference to the test method for verification. The standard ASME A112.18.1/CSA B125.1 specifies how a manufacturer is to test these products, and Section 5.3.6 includes a leakage rate test.<br><br>As noted in the proposal substantiation, the maximum leakage rate in the California Code of Regulations is 0.01 gpm for tub spout diverters which is specified in Table H-3 of 20 CCR § 1605.3. |
| Crawford, Shawn | ABSTAIN W/COMMENT | I don't feel like I know enough about this topic to make an educated decision. |

| Ballot Name: | Item # 047 Comment 01 | |
|---|---|---|
| **Voter Name** | **Vote** | **Comments** |
| Kendzel, Jim | NEGATIVE W/COMMENT | Unenforceable and existing product standards require adequate marking requirements to assist the installer and consumer. |
| Mann, David | NEGATIVE W/COMMENT | This is unenforceable. This should have been accepted. As I stated before, many times the valve and the trim are shipped separately. In the real world, this makes no sense at all. |
| Thompson, Kyle | NEGATIVE W/COMMENT | The existing language is unenforceable. Tags or labels as currently required are likely be discarded before the device is installed. Compliance with ASSE 1016 requires identification markings on the device and the minimum flow rates to be included on the product packaging or literature, and if needed |

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| | | for future replacement, an installer can track down the information through the products identification markings.<br><br>In addition, markings on the trim components that would be "visible after installation" are not possible in all applications as the same trim can be used in combination with a variety of different valve types. |

| **Ballot Name:** | **Item # 079 Comment 03** | |
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| **Voter Name** | **Vote** | **Comments** |
| Premer, Damon | NEGATIVE W/COMMENT | At no point should human waste be diverted via plumbing without permits or Authority Having Jurisdiction oversite. |
| Kendzel, Jim | NEGATIVE W/COMMENT | I am in agreement with negative comments submitted. |
| Koeller, John | NEGATIVE W/COMMENT | I agree with the comments by Kent Sovocool. |
| White, Charles | NEGATIVE W/COMMENT | I am in agreement with Kent Sovocool and have concerns for the safe application of this without Authority Having Jurisdiction oversight. |

| **Ballot Name:** | **Item # 113 Comment 01** | |
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| **Voter Name** | **Vote** | **Comments** |
| Kendzel, Jim | NEGATIVE W/COMMENT | This would be design restrictive. The rationing concept does not have any technical justification. Also, putting restrictions on home owners while commercial can use all the water they want is not justified. |

| **Ballot Name:** | **Item # 118 Comment 01** | |
|---|---|---|
| **Voter Name** | **Vote** | **Comments** |
| Kendzel, Jim | NEGATIVE W/COMMENT | I agree with Chuck White's negative comments. |
| White, Charles | NEGATIVE W/COMMENT | The wording of the change requires one to find the scope of NSF/ANSI/CAN 61 and NSF P151, to know what items are covered by the scope, and then goes on to say those items are covered by "it." The items of the scope should be stated in the WEStand language so it is clear to the user.<br><br>Further, the proponent's substantiation does not wish to cover gutters in NSF P151. Yet they are covered by the scope, which means gutters are covered. It is unclear what the intent really is. |

| **Ballot Name:** | **Item # 124 Comment 01** | |
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| **Voter Name** | **Vote** | **Comments** |
| Lenger, Markus | AFFIRMATIVE | As the proponent, I would like to point out that this appendix (not standard) has been vetted by a differently formed task group twice. As for the ARCSA standard, we had several members on the task force that authored the ARCSA standard, and they concurred as well. It is only used in the context of final water quality parameters. |

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| | | The second task group was formed by the explicit wishes of the technical committee and involved the leading senior experts in this field. We all unanimously concurred this is a step in the right direction. This appendix hands over every aspect of permitting to the Authority Having Jurisdiction. |
| Kendzel, Jim | NEGATIVE W/COMMENT | I agree with other comments submitted. I believe this entire appendix should be first published as a general guideline and be further vetted in actual use before published as "code ready" text. |
| White, Charles | NEGATIVE W/COMMENT | Per the U.S. EPA; "The process of using treated wastewater for drinking water is called potable water reuse." It is misleading to imply this is potable water use. In the substantiation, it is stated that the evaluation parameters are consistent with standards established by the U.S. EPA, if this is indeed potable, the water should meet the EPA standards. |

| **Ballot Name:** | **Item # 125 Comment 01** | |
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| **Voter Name** | **Vote** | **Comments** |
| White, Charles | NEGATIVE W/COMMENT | This is direct potable water reuse, not use, and is considered as such by the U.S. EPA. |
| Kendzel, Jim | ABSTAIN W/COMMENT | I do not have a technical issue with the appendix, but I would have preferred the work be presented as a general guideline versus an adoptable code. I would have liked to see the guideline used for a while by regulatory bodies and other users before putting out to the public as code adoption ready. |
| Tabakh, Amir | ABSTAIN W/COMMENT | The level of potential public risk warrants further discussion on this section, and language beyond that of a conceptual nature for blackwater treatment for potable water reuse is premature at this time. |

| **Ballot Name:** | **Item # 126 Comment 01** | |
|---|---|---|
| **Voter Name** | **Vote** | **Comments** |
| White, Charles | NEGATIVE W/COMMENT | This is direct potable reuse, not use. |
| Kendzel, Jim | ABSTAIN W/COMMENT | I do not have a technical issue with the appendix, but I would have preferred the work be presented as a general guideline versus an adoptable code. I would have liked to see the guideline used for a while by regulatory bodies and other users before putting out to the public as code adoption ready. |
| Tabakh, Amir | ABSTAIN W/COMMENT | The level of potential public risk warrants further discussion on this section, and language beyond that of a conceptual nature for blackwater treatment for potable water reuse is premature at this time. |

| **Ballot Name:** | **Item # 127 Comment 01** | |
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| **Voter Name** | **Vote** | **Comments** |
| Premer, Damon | NEGATIVE W/COMMENT | I am in support and agreement of Samantha Barnes' reasoning. |

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| Kendzel, Jim | NEGATIVE W/COMMENT | I am in support of other negative comments received, and I would have preferred the work be presented as a general guideline versus an adoptable code. I would have liked to see the guideline used for a while by regulatory bodies and other users before putting out to the public as code adoption ready. |
| White, Charles | NEGATIVE W/COMMENT | This is direct potable reuse, not use. Further, the proposal continues to require a design professional to install these systems, while they may be designed by a professional engineer, they will be installed by other trade professionals. |
| Tabakh, Amir | ABSTAIN W/COMMENT | The level of potential public risk warrants further discussion on this section, and language beyond that of a conceptual nature for blackwater treatment for potable water reuse is premature at this time. |

| **Ballot Name:** | **Item # 132 Comment 01** | |
|---|---|---|
| **Voter Name** | **Vote** | **Comments** |
| White, Charles | NEGATIVE W/COMMENT | I do not believe some portions of the illustrations meet the intent of the plumbing code but perhaps others do not believe this is plumbing. |
| Tabakh, Amir | ABSTAIN W/COMMENT | The level of potential public risk warrants further discussion on this section, and language beyond that of a conceptual nature for blackwater treatment for potable water reuse is premature at this time. |

| **Ballot Name:** | **Item # 133 Comment 01** | |
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| **Voter Name** | **Vote** | **Comments** |
| Thompson, Kyle | AFFIRMATIVE | A water efficiency rating system is important to many areas now struggling with water shortages. The current text will allow the Authority Having Jurisdiction an option between the three referenced rating systems, and the decision of which rating system to apply should be in hands of local authorities familiar with the site conditions and building necessities. |
| Premer, Damon | NEGATIVE W/COMMENT | I agree with prior negative comments. |
| Kendzel, Jim | NEGATIVE W/COMMENT | My negative vote is substantiated by the responses already submitted by others voting negative. |
| White, Charles | NEGATIVE W/COMMENT | There is considerable debate as to what is soft water. Per the U.S. Dept of Energy, soft water would be 0 to 3 grains per gallon, moderately hard to 7 grains per gallon, and hard above 7 grains per gallon. Using a Purdue University chart found on the Bradford White website, it would seem that a usage of 330 gallons per day of hot water at 140°F would yield 2.7 pounds of lime scale per year. (https://www.bradfordwhite.com/forthepro-bulletins/mineral-build-up/)<br><br>That amount in a tankless heater would be problematic in a very short time. 10 grains per gallon is not soft water. There should be an exception for residences such that they are not |

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| | | saddled with the expense of maintaining their hot water systems. Additional scientific information shows calcium carbonate to be soluble to 15 mg/L at 25°C (about 77°F) and has an inverse solubility, meaning at higher temperatures the material will have more precipitate (17 mg/L is about 1 grain per gallon). |
| Crawford, Shawn | NEGATIVE W/COMMENT | Reducing water hardness has a direct impact on water efficiency. Higher water quality will result in better performance from the equipment using the water and will result in less energy and water loss. |

| **Ballot Name:** | **Item # 133 Comment 02** | |
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| **Voter Name** | **Vote** | **Comments** |
| Kendzel, Jim | NEGATIVE W/COMMENT | My negative vote is based on the Technical Committee rejecting Comment #2, and I believe the substantiation for accepting Comment #2, provided by Samantha Barnes, is adequate and technically sound and supports my negative vote against the Technical Committee's decision to reject. |
| Koeller, John | NEGATIVE W/COMMENT | I concur with the previous comments of Jim Kendzel, Charles White, and Samantha Barnes. |
| White, Charles | NEGATIVE W/COMMENT | There is considerable debate as to what is soft water. Per the U.S. Dept of Energy, soft water would be 0 to 3 grains per gallon, moderately hard to 7 grains per gallon, and hard above 7 grains per gallon. Using a Purdue University chart found on the Bradford White website, it would seem that a usage of 330 gallons per day of hot water at 140°F would yield 2.7 pounds of lime scale per year. (https://www.bradfordwhite.com/forthepro-bulletins/mineral-build-up/)<br><br>That amount in a tankless heater would be problematic in a very short time. 10 grains per gallon is not soft water. There should be an exception for residences such that they are not saddled with the expense of maintaining their hot water systems. Additional scientific information shows calcium carbonate to be soluble to 15 mg/L at 25°C (about 77°F) and has an inverse solubility, meaning at higher temperatures the material will have more precipitate (17 mg/L is about 1 grain per gallon). |
| Crawford, Shawn | NEGATIVE W/COMMENT | Improving the general water quality will result in higher performance from equipment using the water. For example, calcification buildup on hot water elements leads to wasted water from occupants because of the lack of instant hot water. Most water using appliances require a certain water quality standard or hardness range. |