



January 31, 2020

Jeanine Townsend  
Cleck to the Board  
State Water Resources Control Board  
1001 I Street  
24<sup>th</sup> Floor  
Sacramento, CA 95814

**Re: Comments on the Draft Policy for Developing the Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund as published by the State Water Resources Control Board**

Dear Ms. Townsend,

The Water Quality Association (WQA) is pleased to comment on the Draft Policy for Developing the Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund (Policy) as published by the State Water Resources Control Board (Board). This is a critical effort for the State of California, and the WQA, along with the Pacific Quality Water Association (PWQA), looks forward to working with the Board and interacting with other interested stakeholders as the Board develops and implements solutions through the Policy for improving the state's water systems and water quality throughout the California as set forth in SB 200.

**Background**

As you may know, the WQA has a mission and vision to facilitate sustainable water quality improvement to enhance lives. WQA is recognized as an important resource and advocate for the betterment of water quality, while it helps maintain and promote the industry's core values and shared passions: Ethics and integrity; Advocacy and education; Science-based decision making; Collaboration; and Performance-based standards. Through WQA's more than 2,500 member companies, it is committed to ensuring that the water delivered to a consumer meets rigorous regulatory and third-party certification standards using what are known as point-of-use (POE) or point-of-entry (POE) systems, which are typically installed at the site of the homeowner's or business-owner's property.

**Recommendations**

I. Point of Use and Point of Entry Water Treatment Solutions

The use of third-party certified POU/POE water treatment products and systems is a safe and effective solution for communities and landholders where a central treatment facility is not

economically feasible. These products are placed under sinks, at faucets, in refrigerators or at other locations in the home. In addition, our members manufacture several differing systems for commercial and industrial treatment applications. The case for POU/POE water treatment solutions is becoming more and more self-evident. Municipalities need the flexibility to encourage these options which are proving to be not only reliable but cost-effective. This has been seen in California and other places across the country:

*In La Selva Beach, CA, the San Andreas Mutual Water Company in November of 2018 found that POU/POE systems were the only economically feasible treatment method during the period when the Cr-6 MCL level was at 10 ppb.*

POE and POU products and systems, appropriately certified, installed and monitored, are comprehensively reliable solutions to help restore or maintain water quality and reliability. To ensure that safe and efficacious POE and POU products and systems are used, we recommend the Policy include language as follows: *If POU/POE technology is used, its products are required to be certified by an ANSI-accredited certification body, like WQA's Gold Seal Product Certification Program. If the product is installed in a residential application, it should be registered with California's Water Treatment Devices Registration Program.*<sup>1</sup>

As part of the definition section of the Policy, we suggest the following be added on page 6:

*Point-of-Entry (POE) devices are whole-house treatment systems mainly designed to reduce contaminants in water intended for showering, washing dishes and clothes, brushing teeth, and flushing toilets.*

*Point-of-Use (POU) devices treat water at the point of consumption. The technology provides a final barrier to the contaminants of concern before the water is consumed or used.*

*Gold Seal Trademark-POU/POE products that have obtained third-party certification from the Water Quality Association. It assures customers of the adherence to the industry standards.*

Additionally, because the use of certified POE/POU products and systems offer valuable tools and solutions for providing safe and affordable drinking water, we recommend that POU/POE products, systems and technologies be added on page 12/13 Section D:

Solutions may include, but are not limited to, a mix of the following:

- i. Interim water supplies, *including the use of third-party certified POU/POE products, systems and technologies.*

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<sup>1</sup> WQA's also continues to work with the Board on the Residential Water Treatment Devices Registration Program and helps ensure that water treatment products and systems have been tested and certified to industry standards. WQA's Gold Seal Product Certification Program is accredited by the American National Standards Institute (ANSI) and the standards against which such products and systems are certified require that they are constructed or formulated from safe materials, the claims listed on the packaging are backed by test data, and the product will hold up under the expected usage conditions.

And that the same language be added in Section E on page 14:

- i. Interim water supplies, *including the use of third-party certified POU/POE products, systems and technologies*

Additionally, in Section F on page 14/15, under the Safe and Affordable Drinking Water Fund Solution List, we recommend that the following provision be added:

*The Fund Solution List may also include the consideration of third-party certified POU/POE products, systems and technologies on a short term or long-term basis where they may be used as efficient and readily available solutions in certain communities.*

## II. Division of Financial Assistance Consultation

As outlined in the Policy and based on the Needs Assessment and other available information, the Division of Financial Assistance (DFA) will be administering funding to technical assistance providers and community outreach organizations to assist with evaluating and prioritizing systems and identifying solutions. Under the Policy, DFA may consult with individuals with knowledge of a water system's needs, including but not limited to, Water Boards staff, technical assistance providers, Advisory Group members, and other professionals to assist with evaluating the technical, managerial, and financial (TMF) assessment of systems and identifying opportunities for improvement and consolidation. WQA is supportive of this sound approach, but would recommend DFA also include non-profit associations, such as WQA, that have subject matter expertise on water quality issues and solutions, including technical third-party certification programs

## III. Monitoring Water Quality and Ongoing Maintenance

As the Board knows from its experience with POU/POE water treatment solutions as well as from its technical advisors, water quality monitoring and ongoing maintenance are critical components to a successful outcome for users of these technologies. As the Board contemplates its structural requirements for the Policy, WQA would recommend that a program offering be put in place for the adoption of POU/POE solutions for consumers that has the following components:

- a. An initial assessment/testing of a consumer's drinking water to evaluate critical aspects of the water quality and aid in the identification of the appropriate water treatment solution;
- b. A consultation with a water utility or a licensed and certified water professional to assist in selecting an appropriate treatment solution;
- c. Installation of third-party certified water treatment products and solutions by a licensed and certified water professional
- d. A water quality monitoring program that includes an on-site visit by a licensed and certified water professional; and

If necessary, periodic on-site visits by a licensed and certified water professional to replace and/or exchange, and reclaim water treatment equipment, including expired filters.

#### IV. Consumer Education

Finally, in our experience, a successful POU/POE water treatment and monitoring program should include a consumer education campaign component. A successful consumer information and education campaign typically would include: education on POU/POE products and solutions (e.g. what they are, how they work, and effectiveness); affording consumers round the clock access to water professionals who can assist in answering questions. Along those lines, the following pillars for a successful consumer education campaign can serve as a guidepost for the Board:

##### 1. Direct Personal Interaction

Direct face to face communications with the customer in the service community is the most effective way to convey necessary information to allay any concerns. This could be done by utilities' personnel and licensed and certified contractors and water professionals.

##### 2. Print Media

In addition to direct interactions, utilities may use various forms of print media to deliver the needed message. These could include:

- Informational/warning notices enclosed with each month's water bill
- Brochures that clearly explain POU/POE treatment products and solutions
- Safety precaution and important "do's and don'ts"
- Posters that present important information, public forum dates and contact numbers
- Public services announcements (PSA's) in local newspapers and community newsletters.

##### 3. Broadcast Media

Utilities would provide experts, including utility employees and license and certified contractors and water professionals, for media interviews about the status of the program.

##### 4. Social Media

Develop a strong social media campaign. This would include the use of Facebook, LinkedIn, Twitter and other widely adopted platforms. A dedicated website would be developed to keep the customer informed on the contaminants, maintenance information, best practices and FAQ's.

WQA can serve as a resource to the Board and entities selected to administer the Fund Expenditure Plan on a consumer education campaign as well as a broader communications and information plan. In this process, WQA's Training and Professional Certification programs would be presented and explained to consumers to aid in building their confidence in the

licensed and certified contractors and water professionals presenting, providing and servicing POU/POE water treatment products and solutions.

Conclusion

Once again, WQA appreciates the opportunity to submit these comments on the Board's Draft Policy for Developing the Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund. WQA including, but not limited to, its research arm, the Water Quality Research Foundation (WQRF), as well as our Gold Seal Product Certification Program, would very much appreciate the opportunity to be a resource to the Board.

We are more than ready to assist California at such a critical time when it comes to water quality. Please let us know how we can begin to work together.

Sincerely,



David Loveday  
Global Government Affairs Director  
Water Quality Association