



June 15, 2020

Jeanine Townsend
Clark to the Board
State Water Resources Control Board
1001 I Street
24th Floor
Sacramento, CA 95814

Email address: Commentletter@waterboards.ca.gov

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 Board

Dear Jeanine Townsend,,

The Water Quality Association (WQA) is pleased to comment on the Draft Policy for Developing the Fund Expenditure Plan (Plan) for the Safe and Affordable Drinking Water Fund as published by the State Water Resources 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 other interested stakeholders, as it develops and implements solutions for improving the state's water systems and water quality throughout the state as set forth in SB 200. The WQA commends the Board's staff for its hard work and dedication in producing this document during these unprecedented times.

Background

WQA has a mission and vision to facilitate water quality improvement to enhance lives sustainably, and be recognized resource and advocate for the betterment of water quality, while maintaining and promoting core values of: Ethics and integrity; A shared passion; Advocacy and education; Science-based decision making; Collaboration; and Performance-based standards. Through WQA's more than 2,500 member companies, it 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 on 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 systems is a safe and effective solution for communities where a central treatment facility is not economically feasible. These products are placed under sinks, at faucets, in refrigerators or other locations in the home. In addition, our members manufacture several 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. WQA is pleased that the Board recognizes the importance of the use of POU/POE for interim and potential long-term solutions for California communities.

To ensure the safety of products we would also recommend the plan include language that 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.¹

II. Monitoring Water Quality and Ongoing Maintenance

As the Board knows from its technical expertise of POU/POE water treatment solutions, 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 Plan, WQA recommends that the any program contain the following components:

- a. An initial assessment / test of the consumers drinking water to first identify the water quality so as to determine 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 solution 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
- e. If necessary, an on-site visit by a licensed and certified water professional to replace and/or exchange, and reclaim water treatment equipment, including expired filters.

III. Innovative POU/POE Technology

¹ WQA's also continues to work with the California State Water Resources Control Board on the Residential water Treatment Devices Registration Program, WQA ensures that water treatment products 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 requires a product is constructed or formulated from safe materials, the claims listed on the packaging are backed by test data, and the product will hold up under normal usage conditions.

WQA looks forward to participating with the DDW to develop potential pilot opportunities for POU/POE technology which we believe can quickly assist those communities who are in critical need of potable water. WQA recognizes that any such effort requires the involvement of an informed community and WQA will assist the DDW in any way to set up a community outreach program and workshop to publicly discuss potential solutions.

Conclusion

Once again, WQA appreciates the opportunity to submit comments the Board's Draft Policy for Developing the Fund Expenditure Plan for the Safe and Affordable Drinking Water Fund. WQA would like to be a resource to the Board, including, but not limited to its research arm, the Water Quality Research Foundation (WQRF), as well as our Gold Seal Product Certification Program, which is a scientific method to assure the safety and efficacy of water treatment technology solutions.

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,

A handwritten signature in cursive script, appearing to read "David Loveday", with a long horizontal flourish extending to the right.

David Loveday
Global Government Affairs, Director
Water Quality Association
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