

Hi Kevin

I have attached the two files below with pop-up notes in the sections where I have suggestions and/or general questions to let you know where we are at with our review with the hope of obtaining some clarity moving forward.

In addition, you will see comments from PMI regarding RW use concerns which we also share. The plumbing products industry, as part of complying with the plumbing codes, tests and certifies via third party their plumbing products using fresh water quality. We do not have much experience under our belt with respect to the compatibility from a product performance/functionality perspective with RW as well as a health ad safety perspective.

Thus we also have similar questions with regard to the use of RW (be it NSF 350 treated or per the CA regs for municipally supplied) when the RW is in contact with open sores, wounds, and in direct contact with one's private areas for washing purposes.

I look forward to continued participation with the hope of reaching a mutually agreeable goal with respect to conservation and compatibility. Thank you.

Regards,

Fernando Fernandez,
Director Codes and Standards
TOTO USA, Inc.
5351 E. Jurupa St.
Ontario, CA 91761
ph: 909 974-5670
fx: 909 390-5724
web: www.totousa.com

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217.0 Onsite Treated Nonpotable Water. In 206.0 the definition includes the minimum level of quality that DTRW must meet.

It would seem appropriate that the definition in 217.0 for OSTNPW also include the minimum level of quality it needs to meet.

Furthermore, if both types of water are for direct beneficial use, why not have them both meet the same level of quality?

How does one distinguish the end use applications if the effluent will meet different quality levels? eg: Is the DTRW treated to a higher level than OSTNPW?

220.0

Reclaimed (Recycled) Recycled Water. It seems clause 220 is just an equivalent to 216. Therefore, one could incorporate portions of 220 in 216 and strike out 220 altogether unless there is some value in a stand alone, repeated definition.

408.2 Water Consumption. Is this best left as a note to inform of a future change in the water consumption?

601.3.2 Color and Information. Figure 601. Is there a requirement for a color symbol (red cross out circle with blue for the water)? It's a better visual indicator.

602.3 Backflow Prevention. 602.3 Just recycled water supply? How about expanding to onsite treated NP and graywater too? Or, just refer to RW systems to cover all types.

1501.1.1 Allowable Use of Alternate Water. At present, there are other plumbing fittings being used that may not have been taken into account which may restrict the use and compatibility of recycled water with them - eg: bidet toilet seats. Thus, it may be a better approach to be specific to maintain a fresh water supply stubbed out for the toilet in addition to the RW line until such time it can be assured that RW does not pose a health and safety issue when used with a bidet seat.

1501.3 Permit. why was reference to section 18940.6 removed?

1501.7 Minimum Water Quality Requirements. 1501.7 Intended application is left to the AHJ.

We are really talking about RW systems usage for toilets, urinals and irrigation. Do we have to leave it to the AHJ or just define it here.

1501.7.1 Minimum Water Quality Requirements for On-Site Treated Nonpotable Graywater. 1501.7 - 1501.7.1 and .2: *Having two levels of treatment for the same intended application appears questionable if there are two different levels of water quality parameters.*

In other words how does NSF 350 quality compare to the states definition for disinfected tertiary treated RW?

eg: compatibility with toilets, urinals and associated valves.

1503.1.1 Residential Occupancies. 1503.1.1 (1): Does this mean that a RW system shall be installed for allowing connections to those prescribed fixtures but not mandatory?

1503.1.1 (2): So this basically means that at a toilet or urinal, there will be two supply lines stubbed out - one for potable and one for RW?