

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: cbsc@dgs.ca.gov

Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 24, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 8, 2012

Date: 10/8/12

From:

Tracy Quinn
Name (Print or type) (Signature)

-- Natural Resources Defense Council
Agency, jurisdiction, chapter, company, association, individual, etc.

1314 2nd Street Santa Monica CA 90401
Street City State Zip

I/We do not agree with:

[x] The Agency proposed modifications As Submitted on Section No. 16

and request that this section or reference provision be recommended:

[] Approved [] Disapproved [] Held for Further Study [x] Approved as Amended

Suggested Revisions to the Text of the Regulations:

1601.7 Minimum Water Quality Requirements

Exceptions:

(1) Water treatment is not required for gray water used in a disposal filed or for subsurface or subsoil irrigation
(2) Simple systems that collect gray water from a single source and use in an indoor application must meet the following minimum water quality requirements.

Escherichia coli < 100 CFU/100 ml

Turbidity < 10 NTU

Reason: The Natural Resources Defense Council (NRDC) supports the work of CBSC and HCD to facilitate the greater use of gray water while ensuring the protection of public health. Based on this intention of this section of the code, we believe that the water treatment requirements for simple systems may be excessive for some systems and applications. The current code modification requires simple systems, such as those that collect only lavatory faucet water, to meet all the requirements of NSF 350 which are extensive. Allowing the use of filtered and disinfected gray water collected from a single allowable gray water source should be sufficient for the protection of public health in applications such as urinal and water closet flushing. This change will allow the small,

simple packaged gray water systems already on the market to be installed in California and help urban water suppliers meet potable water demand reduction goals.