## GEW177-14 704.1.2

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## **Revise as follows:**

**704.1.2 Water consumption.** Water softeners shall have a maximum water consumption during regeneration of  $\frac{5}{4}$  gallons ( $\frac{18.9}{15.1}$  L) per 1000 grains (17.1 g/L) of hardness removed as measured in accordance with NSF 44.

**Reason:** The current specification for water consumption is the minimum voluntary performance specification contained in NSF 44, which more than 60% of residential demand-initiated regeneration (DIR) models meet. Furthermore, at least half the residential DIR systems on the market use 4.0 gallons of water or less per 1000 grains of hardness removed. Thus, the IgCC has ample room to specify a water consumption specification that is substantially more resource-efficient than the minimum in NSF 44.

## Bibliography:

Notification of Intent to Develop Draft Efficiency and Performance Specifications for Cation Exchange Water Softeners, US Environmental protection Agency, November 18, 2010.

**Cost Impact:** Will not increase the cost of construction. Many models are on the market today that would meet the specification proposed here for 2015. Cost impact is negligible.

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