

## PUBLIC COMMENT SUBMISSION ON WATERSENSE DRAFT HIGH-EFFICIENCY FLUSHING URINAL SPECIFICATION

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**Topic: 1.0 Scope and Objective**

**Comment:** The Alliance for Water Efficiency supports the establishment of a WaterSense specification for flushing urinals. We urge the adoption of this specification at the earliest practical date. In this, and all WaterSense specifications, EPA should state its commitment to periodically review and update the specification as warranted by economic and technological developments in the marketplace.

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**Topic: 1.0 Scope and Objective**

**Comment:** The scope of the specification should also include tank-type urinals.

**Rationale:** While tank-type urinals represent a small fraction of the market, they could be manufactured to meet the water efficiency and performance requirements of the specification.

**Suggested Change (or Language):** Add the following bullet point to the points in Section 1.0:

- Tank-type (gravity-fed) flushing devices that deliver water to urinal fixtures.

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**Topic: 5.0 Pressurized Flushing Device Requirements**

**Comment:** WaterSense should consider developing a sensor performance requirement for sensor-activated pressurized flushing devices.

**Rationale:** A common complaint about sensor-activated pressurized flushing devices is that false actuation (flushing when it's not supposed to) wastes water. We feel that otherwise compliant PFDs that are equipped with poor sensors will visibly waste water and have the potential to detract from the WaterSense brand. However, at this time there is no industry standard test of sensor performance. Such a test would need to be developed with support from product manufacturers. We do not wish to hold up release of the specification on this point, but would suggest future revisions include such a requirement.

**Suggested Change (or Language):**

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**Topic: 5.4 Non-Interchangeable Parts Requirement for PFDs**

**Comment:** Interchangeable parts should be limited to those that maintain the urinal’s rated flush volume.

**Rationale:** Field adjustability has the potential to erode water savings, degrade flushing performance, and compromise the WaterSense brand. To ensure rated performance, limits on interchangeable parts should preclude flushing at lower than rated volumes as well as higher than rated volumes.

**Suggested Change (or Language):** Modify the current text as follows:

The pressurized flushing device must not contain interchangeable parts, such as pistons or diaphragms, which if replaced with commonly available alternative components would allow the device to flush at other than its rated flush a higher volume.

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**Topic: 6.0 Marking**

**Comment:** Both the product and the product packaging should be marked with maximum flush volumes.

**Rationale:** Permanent marking of the flush volume on the product itself, as well as on its original packaging, is very desirable, because commercial building owners, managers, and maintenance staff all change over time, sometimes rapidly. A permanent mark on both fixture and valve is necessary to ensure proper maintenance, and to facilitate any future on-site audit of water consumption.

**Suggested Change (or Language):** Revise “The product and/or the product packaging must be marked . . .” to read “The product and the product packaging must be marked . . .”

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**Topic: Appendix A – 3.0 Independent Labeling of Urinal Fixtures and Pressurized Flushing Devices**

**Comment:** Since pressurized flushing devices (PFDs) and urinal fixtures are often sold separately and may be supplied by different manufacturers, specific pairings of PFDs and fixtures need to be tested in combination in order to be listed as a WaterSense urinal.

**Rationale:** PFDs do not all have the same discharge curves even if they might have the same flush volume. This can mean very different performance in creating a water exchange in the trapway which will prevent odor, unpleasant visible remaining urine and, worst of all mineral deposit build up in the trapways. We believe labeling independent components of a system that needs to perform as a singular product is asking for failures that might backlash against the WaterSense brand.

**Suggested Change (or Language):** Modify the current text as follows:

Certified urinal fixtures and pressurized flushing devices ~~may~~ **shall** be labeled as a complete system ~~or separately as a urinal fixture or pressurized flushing device~~. If labeled **sold** separately, the manufacturer of each part must clearly indicate on product documentation that the part must be used with a WaterSense labeled counterpart that has ~~the same rated flush volume~~ **been tested and certified in combination with that part**, in order to ensure that the entire system meets the requirements of this specification for water efficiency and performance.

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**Topic: Awareness of Potential Drainline Issues from HEUs**

**Comment:** Non-water urinals have been specifically excluded from this draft specification due to lack of sufficient research on the causes and risks of solids buildup in drainlines. We ask that as such research on non-water urinals (and very low volume flushing urinals) is published, that the specification be amended accordingly.

**Rationale:**

**Suggested Change (or Language):**