



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 19 2011

OFFICE OF
WATER

Mr. G. Wade Miller
Executive Director
WaterReuse Association
1199 North Fairfax Street, Suite 410
Alexandria, VA 22314

Dear Mr. Miller:

Thank you for your letter of July 21, 2011, in which you and a number of co-signatories communicated continuing concern about a potential WaterSense specification for cation exchange water softeners. Your letter specifically requested that the U.S. Environmental Protection Agency (EPA) stop work on development of a specification for this product category and recommended that the EPA develop a more integrated approach to salt management.

As I noted in an earlier response to a letter you had directed to Assistant Administrator Pete Silva in January 2011, the notice of intent (NOI) issued by the WaterSense program was intended to solicit additional technical information from stakeholders prior to making a decision on whether to proceed with a specification. WaterSense issued its NOI in November 2010 and received comments from seventeen commenters, including the two letters sent by your coalition. These comments have been made available on the WaterSense website.

At this time, the WaterSense program does not plan to move forward to develop a draft specification. This is due, in part, to concerns raised by your colleagues about the effect water softeners can have on wastewater salt discharges. The program will continue to monitor and evaluate new information that may arise. Any decision to proceed in the future would be widely disseminated prior to development of a draft specification.

While the agency recognizes the significant concerns that some communities face due to increased loading of chlorides from softeners used within their service areas, the majority of listings on the EPA's 303(d) list with impairments attributed to the category "salinity/total dissolved solids/chlorides/ sulfate" are not linked specifically to water softeners or discharges from publicly owned treatment works. A variety of point and non-point sources of contamination, including oil and gas operations, agriculture, mining, and road deicing applications contribute to impairments. It is important that states and localities take action to control these and other sources, much like many communities have done in implementing local bans on the use of water softeners.

Again, thank you for your letter. I would be happy to meet with you or representatives of the other organizations which signed the letter to discuss this issue and how we may work with stakeholders to address issues related to salt management. We hope that we may continue to depend on your support and that of the broader water efficiency community as we work to expand awareness about water issues. If you have further questions or would like to schedule a meeting, please contact me or your staff may call Sheila Frace, Director of the Municipal Support Division, at (202) 564-0749.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Shapiro". The signature is written in black ink and is positioned above the typed name.

Nancy K. Stoner
Acting Assistant Administrator