



February 27, 2023

Board of Directors
Big Sky County Water & Sewer District No. 363
561 Little Coyote Rd
Big Sky, MT 59716

RE: Ordinance No. 97-1001 – Wastewater Use Ordinance

Dear Board of Directors,

On behalf of the Water Quality Association (WQA), a not-for-profit trade association representing the residential, commercial, and industrial water treatment industry, we would like to express our concern with the proposed changes to Ordinance No. 97-1001 – Wastewater Use Ordinance. We encourage the Board to review Article 13 of the ordinance and reconsider prohibiting water softeners.

A study conducted by the [Battelle Memorial Institute](#) asserts that residential and commercial water softening and conditioning systems are vital in ensuring that home, business, and medical appliances operate effectively and efficiently. Cation exchange water softeners remove the calcium and magnesium ions found in hard water by exchanging them with sodium or potassium ions. These systems also can address certain contaminants in drinking water, including the reduction or removal of radium, barium, strontium, iron, or other divalent cations, and can have a positive impact on certain health concerns.

Please understand water softeners are required to be third-party certified and will reference the appropriate NSF/American National Standards Institute (NSF/ANSI) standards for drinking water treatment devices to ensure that these systems function as intended. Additionally, Section *611.1 Drinking Water Treatment Units* of the Montana State Plumbing Code requires water softeners to be certified to NSF/ANSI 44. The standard describes the requirements and test methodology used to determine the efficiency of water softeners.

We realize that Big Sky County Water & Sewer is concerned with levels of sodium in their water reuse applications and urge the consideration of alternative softening applications that use a potassium chloride regenerate. Additionally, there are other methods to minimize discharges from existing softeners that use sodium chloride; optimizing water softeners improves the efficiency and reduces discharge by adjusting the system to be consistent with the level of hardness the softener is addressing.



2375 Cabot Drive
Lisle, Illinois 60532-3696 USA
Phone 630-505-0160
Fax 630-505-963
<https://wqa.org/>



We'd also ask Big Sky Water & Sewer for further information and clarity on the following:

1. What is the water chemistry and sodium levels of the source water for reuse applications?
2. What are the levels of sodium at the WWTP?
3. Has the Board reviewed alternative softening applications and the potential impact of a softener ban on stakeholders in the Big Sky area?

Going forward, WQA would welcome any opportunity to serve as a resource to Big Sky Water & Sewer. We have more than 2,500 member companies including manufacturers, dealers, and distributors who specialize in the water treatment industry and can provide valuable information. We appreciate the opportunity to weigh in on this important regulatory matter and if you have any questions, please do not hesitate to contact either Jordan Kari or Jeremy Pollack directly or you can contact govaffairs@wqa.org.

Best regards,

A handwritten signature in black ink that reads "Jeremy Pollack".

Jeremy Pollack
Director of Government Affairs,
Water Quality Association
630-929-2537

A handwritten signature in black ink that reads "Jordan Kari".

Jordan Kari
Government Affairs Coordinator
Water Quality Association
331-305-6499



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