



The Honorable Ismael Smith-Wade-El  
Pennsylvania House of Representatives  
103A East Wing  
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**RE: Pennsylvania House Bill 2145**

Dear Representative Smith-Wade-El,

On behalf of the International Association of Plumbing and Mechanical Officials (IAPMO), NSF and the Water Quality Association (WQA), we would like to thank you for sponsoring [House Bill 2145](#), *Amending Title 27 (Environmental Resources) of the Pennsylvania Consolidated Statutes, providing for Legionnaires' disease risk management; and imposing penalties* and its importance in addressing drinking water contamination in building water systems. Our organizations aim to provide technical input to refine legislation that addresses water quality issues. With this goal in mind, we respectfully propose a clarifying amendment which we believe will strengthen the impact of the legislation.

As you likely know, *Legionella* bacteria are found naturally in freshwater environments, like lakes and streams. The bacteria can however become a health concern when they grow and spread in human-made building water systems like large plumbing systems and fixtures, cooling towers (structures that contain water and a fan as part of centralized air-cooling systems for buildings or industrial processes), and hot water tanks and heaters. While the presence of bacteria may not always pose an immediate threat, it is crucial to recognize that building water systems with unchecked growth and dissemination of bacteria, particularly *Legionella*, can become a significant health concern.

To ensure that a building water system is safe for use, a proactive approach is the best method in mitigating drinking water issues. Although there are no federal requirements for *Legionella*, organizations have developed guidance for *Legionella* control. The 2016 EPA guidance<sup>1</sup> on technologies for *Legionella* control and the CDC toolkit<sup>2</sup> on implementing the ASHRAE Standard 188, outline a variety of treatment techniques for *Legionella* control including point-of-use (POU) filtration and Ultraviolet (UV) drinking water treatment systems. Therefore, it is important to reference the correct treatment technologies and corresponding third-party certification standards for bacteria claims in legislation to ensure that building owners and managers utilize the proper treatment technique.

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<sup>1</sup> [https://www.epa.gov/sites/default/files/2016-09/documents/legionella\\_document\\_master\\_september\\_2016\\_final.pdf](https://www.epa.gov/sites/default/files/2016-09/documents/legionella_document_master_september_2016_final.pdf)

<sup>2</sup> <https://www.cdc.gov/legionella/wmp/toolkit/index.html>

The proper installation and use of certified water filters can be part of the effort to help reduce the growth and spread of *Legionella* bacteria. **As such, we would recommend, in §6704(e)(8)(iii), that you consider adding the following language to help clarify for the public the types of water filters that should be used for *Legionella* mitigation and remediation:**

(iii) Installing a **third-party certified** water filter or water treatment device **certified to NSF P231, NSF/ANSI Standard 244, or NSF/ANSI Standard 55 (Class A)** to remove or **inactivate *Legionella* bacteria.**

Inclusion of this language will help clarify for the public the exact types of water filters that are certified to help with *Legionella* mitigation and help to ensure better outcomes for consumers.

Our organizations are committed to the highest standards of safety, quality and performance in the certification of these technologies that provide for a healthier and safer Commonwealth. We thank you for your effort and are available to serve as a resource for Pennsylvania.

Sincerely,

Jim Scarborough, Director of Government Relations, IAPMO  
Harold Chase, Director of Legislative & Regulatory Affairs, NSF  
Jordan Kari, Manager of Government Affairs, WQA

cc: The Honorable Dan Frankel, Chair, House Health Committee  
[repfrankel@pahouse.net](mailto:repfrankel@pahouse.net)  
The Honorable Kathy Rapp, Republican Chair, House Health Committee  
[klrapp23@verizon.net](mailto:klrapp23@verizon.net)

<sup>1</sup> [Legionnaires Disease Cause and Spread | CDC](#)

### **About IAPMO**

IAPMO was founded in 1926 by government officials in the US to protect public health and safety by developing the most progressive and technically advanced plumbing, mechanical and water efficiency codes in the world. A large part of IAPMO's work focuses on product testing for the industry. Our research and testing labs are capable of testing products to more than 400 standards and we provide testing to new plumbing products that enter the market every year. These include such devices as shower heads, faucets, and water filters. Our rigorous process includes following the criteria of the American National Standards Institute (ANSI) and the International Organization for Standardization (ISO).

### **About NSF**

NSF is an independent, not-for-profit organization founded in 1944 in Ann Arbor, MI that develops consensus national standards, provides product inspection, testing and certification, auditing, education, and related services in public health and safety. The core purpose of NSF is to "protect and improve human and environmental health." NSF has a long history of working with the EPA, FDA, USDA, CDC, and health related governmental entities at the state and local levels, as well as international bodies. NSF is a Collaborating Centre of the World Health Organization for Food Safety, Water Quality, and Medical Device Safety. NSF/ANSI 53 and

NSF/ANSI 58, American National Standards developed by NSF, allow for the certification of some point of use and point of entry drinking water treatment units to reduce the levels of specified contaminants in drinking water including lead.

### **About WQA**

WQA is a not-for-profit trade association representing the residential, commercial, and industrial water treatment industry with over 2,500 members worldwide. Since its creation in 1974, WQA has worked tirelessly to improve water quality through sustainable technologies and services.

Our members are manufacturers, dealers, and distributors who specialize in point-of-use (POU) and point-of-entry (POE) water filtration systems, which treat water at the tap or entry point of a home or building. WQA also operates an American National Standards Institute (ANSI) accredited testing and certification laboratory that certifies water filtration products to nationally accepted industry standards for contaminant removal.