April 10, 2025

The Honorable Mihaela Plesa
Texas House of Representatives
P.O. Box 2910
Austin, TX 78768
mihaela.plesa@house.texas.gov

RE: HB 5552 – Safe Drinking Water for Schools

Dear Representative Plesa,

On behalf of the American Supply Association (ASA), IAPMO, NSF, Plumbing-Heating-Cooling-Contractors Association of Texas (PHCC-Texas), Texas Water Quality Association (TWQA), and the Water Quality Association (WQA), we want to thank you for your sponsorship of HB 5552. Your bill is very timely and will greatly assist efforts to get the lead out of schools – protecting students and faculty alike.

When addressing water quality issues in legislation, our industry has two important recommendations which are enumerated below. Our organizations support HB 5552 with the request that the following sections be amended, and the proposed language included.

First, we recommend that this legislation be amended to **require third-party certification of drinking water treatment systems, fixtures, and components**. Many water filtration systems claim to improve drinking water quality. However, not all products serve the same purpose; some remove only aesthetic impurities while others are certified to reduce the presence of harmful contaminants. Having an independent third-party certification mark on a product communicates compliance with voluntary and consensus performance standards, improves consumer confidence and helps eliminate concerns about the purchase and installation of non-complying products. This recommendation is aligned with the technical guidance issued by the EPA to reduce lead in drinking water in schools[1].

Lastly, we recommend that this legislation be amended to **reference the appropriate NSF/American National Standards Institute (NSF/ANSI) standards for drinking water treatment systems, including filters, fixtures, and components**. There are currently no federal regulations establishing minimum requirements for the safety and performance of water filtration systems. However, there are voluntary consensus standards that are continually being updated to address emerging threats. When product requirements related to water treatment technologies or drinking water system components are placed into legislation, referencing the appropriate NSF/ANSI standard(s) and third-party certification requirements is vital in verifying these products work as intended.

Therefore, we recommend the following proposed amendments to HB 5552:

[1] https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water

Sec. 38.041. SAFE DRINKING WATER FOR SCHOOLS PLAN.

(c) If the results of a school water source test for lead show a level of lead that exceeds 15 parts per billion, the school district shall:

(1) restrict access to the water source;

(2) determine and mitigate the source of the lead contamination by installing a water treatment system on each drinking water outlet that is third-party certified to NSF/ANSI 53 for lead reduction and NSF/ANSI 42 for particulate reduction (Class 1), or NSF/ANSI 58 for lead reduction; and

(3) continue to restrict access to the water source until a subsequent test, conducted after appropriate mitigation efforts are made, indicates the lead concentration at the source to be below 15 parts per billion.

Sec. 341.0651. TESTING FOR LEAD IN PUBLIC SCHOOLS.

(d) The commission shall publish guidance on suggested means by which a public drinking water supply system may reduce lead in public school water sources, including by replacing fixtures and water lines and installing ~~filters~~ a certified point-of-use water filtration system that is certified by a certifying body accredited by a signatory to the International Accreditation Forum Multilateral Recognition Arrangement (IAF MLA) such as the American National Accreditation Board (ANAB) for drinking water treatment units for lead reduction.

We strongly support the intent of HB 5552 and appreciate the opportunity to collaborate on this vital water quality legislation. We are available to work with you and others to answer questions surrounding water treatment.

Sincerely,

Stephen Rossi, Vice President of Advocacy, ASA
Christina Kaeini, Senior Director of Government Relations, IAPMO
Harold Chase, Director of Government Affairs, NSF
Vicki VanNest, Executive Director, PHCC-Texas
Anthony Karas, Co-Chair TWQA Government Affairs
Paige O'Malley, Government Affairs Manager, WQA

About ASA

The American Supply Association is the national industry trade association representing distributors and their manufacturers and manufacturer representative agencies serving the PHCP & PVF channel. Serving wholesaler-distributors and their supply chain partners in the plumbing-heating-cooling-piping (PHCP) and industrial pipe-valve-fitting (PVF) industry, ASA is a one-stop-shop for legislative and regulatory advocacy, ongoing business intelligence, employee training and education and peer-to-peer networking.

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 PHCC-Texas

PHCC Texas proudly offers the Texas State Board of Plumbing Examiners approved plumbing continuing education, trade classes, and test-prep courses. In addition to being a leading provider of education, we are a strong advocate for the plumbing, heating, and cooling industry. Through legislative and regulatory efforts, we work to protect public health and ensure the highest standards in the plumbing industry.

About TWQA

The Texas Water Quality Association is the trade association representing the household, commercial, and industrial water quality improvement industry in Texas. Its member companies manufacture, sell, and install point-of-use / point-of-entry (POU / POE) equipment, package water treatment plants, and customized water treatment systems. We help develop and sponsor training around the state and facilitate the testing and licensing program administered under the auspices of the Texas Commission on Environmental Quality (TCEQ). Certification under the Water Treatment Specialist (WTS) program assures that individuals are well trained in water treatment application, installation, service and ongoing maintenance practices, and that their work will help to protect public health.

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.