

August 29, 2017

Re: IWSFG Standard 1:2017 – Criteria for recognition as a flushable product.

The City of Gresham supports the efforts of the International Water Services Group (IWSFG) in their development of test methods and standards to produce personal wipes products are flushable and will not harm the collection system.

Over that past 8 years, the City of Gresham has experienced increases in the presence of non-woven wipes materials from clogged pumps, sewer pipes and our wastewater treatment plant. These materials collect throughout our wastewater system require significant efforts by maintenance workers to remove and dispose. These efforts are costly and pose additional exposures and safety hazards.

While the City of Gresham promotes only human waste and modest-strength toilet paper be flushed in a toilet, we recognize some wet wipe products may be acceptable to flush because of their characteristic of rapid disintegration in toilet systems. The IWSFG standards appear to be a positive first step to prevent buildup of non-woven materials in public sewer systems. The standards will clarify for non-wovens manufacturers and retailers which products they can appropriately claim as flushable.

Thank you for the opportunity to comment and furthering the efforts to reduce harm from wipes.
Sincerely,



Andrew C. Degner
Water Resources Division Operations Manager