



Aug. 29, 2017

RE: Support for Proposed IWSFG Standard 1:2017 — Criteria for recognition as a flushable product

Clean Water Services supports the efforts of the International Water Services Group (IWSFG) in its development of test methods and standards to produce personal wipe products that are flushable and will not harm the collection system.

Over the past several years, Clean Water Services has seen more non-woven wipe materials throughout our wastewater treatment system. These materials clog pumps and sewer pipes and require significant effort by maintenance workers to remove and dispose. These efforts are costly and pose additional exposures and safety hazards.

While Clean Water Services advocates 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 they are designed to rapidly disintegrate 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 which products manufacturers and retailers of non-woven materials can appropriately claim as flushable.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth J. Williamson" with a stylized flourish at the end.

Kenneth J. Williamson, P.E., Ph.D.
Director, Regulatory Affairs Department