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June 18, 2013

David Rousse

President

INDA, Association of the Nonwoven Fabrics Industry

1100 Crescent Green, Suite 115

Cary, NC 27518

Via email: [drousse@inda.org](mailto:drousse@inda.org)

**Re: Draft Guidelines for Assessing the Flushability of Disposable Nonwoven Products, Third Edition**

Dear Mr. Rousse:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity given to utility representatives from NACWA, the Water Environment Federation (WEF), and the Maine Wastewater Control Association (MWWCA) to review the draft third edition of INDA's *Guidelines for Assessing the Flushability of Disposable Nonwoven Products* ("Flushability Guidance"). NACWA represents the interests of nearly 300 public wastewater treatment utilities nationwide. NACWA members first raised concerns about flushable wipes and other non-dispersible products in 2009 due to the problems these products cause with clogging pumps, screens, and other equipment. Utilities face significant costs and, in some cases, regulatory compliance implications from the employee time needed to remove clogs, disposal of these products in a landfill, wasted electricity from running clogged pumps, and sewage overflows that sometimes occur due to clogs. Over the last four years, NACWA has worked with INDA, WEF, MWWCA, and the American Public Works Association (APWA) on potential solutions to these problems.

NACWA agrees with the June 11 comments submitted by Rob Villee, Scott Firmin, and Nick Arhontes to the INDA Flushability Taskforce members regarding the draft Flushability Guidance. NACWA appreciates that INDA gave these three utility representatives the opportunity to review the draft Flushability Guidance and recognizes that the third edition is a step forward to improved labeling of non-flushables and more rigorous testing of wipes labeled "flushable." However, the Flushability Guidance was developed without input from the wastewater industry. Among the other concerns outlined in the June 11 email comments, NACWA is concerned about the removal of the word "dispersibility" from the Flushability Guidance, since dispersibility of products is the primary concern of utilities, not the flushability of these products.

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NACWA asks that INDA make the changes requested in the June 11 email to the flushability definition and the Do Not Flush labeling. NACWA also asks that the percentage of mass loss required to pass the Sloss Box Dispersion test be increased to at least 60 percent. NACWA requests that INDA continue to work with these three wastewater utility representatives to address the other issues raised in their email by the end of 2013.

Thank you for your consideration of these comments on the draft Flushability Guidance. Please contact me at 202-533-1836 or [cfinley@nacwa.org](mailto:cfinley@nacwa.org) if you have any questions.

Sincerely,

A handwritten signature in cursive script, reading "Cynthia A. Finley".

Cynthia A. Finley, Ph.D.  
Director, Regulatory Affairs

CC: Steve Ogle, INDA Director of Technical Affairs  
David Powling, Flushability Taskforce Chair  
Kyra Dorsey, Incoming Flushability Taskforce Chair  
Todd Bassett, Chairman, INDA Board of Directors  
Phil Pitt, INDA Director of Marketing  
Rob Villee, Plainfield Area Regional Sewerage Authority  
Nick Arhontes, Orange County Sanitation District  
Scott Firmin, Portland Water District