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July 10, 2012

Kim Walior  
OTC Buyer/Pharmacy  
Costco Wholesale Corporation  
999 Lake Drive  
Issaquah, WA 98027

Dear Ms. Walior:

The National Association of Clean Water Agencies (NACWA) appreciates you taking the time to meet with Bobbi Wallace of the City of Kirkland's Department of Public Works and other representatives of wastewater utilities about flushable wipe issues. NACWA represents the interests of nearly 300 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewered population in the U.S. The King County Department of Natural Resources and Parks and the City of Vancouver, who will have representatives joining Ms. Wallace in meeting with you, are NACWA members.

Many NACWA members have experienced problems with wipes and other products that are flushed but that do not disperse in the sewer system. In a survey of NACWA members conducted two years ago, two-thirds of respondents indicated that wipes and other products cause problems in their systems, and most of these agencies said that the problems had been increasing in recent years. The wipes generally cause problems with the pumps at lift stations and can sometimes lead to sanitary sewer overflows (SSOs) in violation of the utilities' discharge permits. Some utilities have also reported problems at their treatment facilities due to wipes and other products. As a result, some utilities are having to spend more on maintenance and/or on installing more expensive equipment to reduce or prevent problems associated with these products.

Since this survey was conducted, members of NACWA and the Water Environment Federation (WEF) have discussed potential solutions to the problem. Many utilities have attempted to address the problem by educating their customers not to flush wipes or any products other than toilet paper. However, the labeling of products as "flushable" creates a mixed message to consumers. There are no requirements that products must meet to be labeled "flushable," and utilities believe that many products carrying this label do not disperse rapidly enough in the sewer system to prevent problems. NACWA would like to see relevant products clearly labeled as

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“not flushable,” with an easily understood “non-flushable” logo on the front label of the package, unless the products meet minimum flushability standards. NACWA understands that INDA (the Association of the Nonwoven Fabrics Industry) has been working with the WEF Collection Systems Committee to improve its Flushability Guidance Document to more accurately reflect actual dispersibility in the sewer system. When completed, this Guidance should provide acceptable flushability standards for products. INDA has also designed a “non-flushable” logo to be used on product packaging.

As a national retailer committed to sustainability, Costco has an excellent opportunity to be a leader in the responsible labeling of products based on their flushability. NACWA asks that Costco consider the request to modify the packaging of Kirkland Brand products to remove the term “flushable” and include a prominent “non-flushable” logo unless they can be shown to meet acceptable flushability standards. In addition, Costco’s participation in a simple education campaign to inform consumers of the problems associated with flushing certain products would be appreciated.

Thank you again for meeting with Ms. Wallace and other wastewater utility representatives about this issue. NACWA looks forward to working with you on potential solutions to the problems that flushable wipes and other products cause for wastewater utilities. Please contact me at 202-533-1836 or [cfinley@nacwa.org](mailto:cfinley@nacwa.org) if you have any questions or if you would like further information from NACWA members about this problem.

Sincerely,

A handwritten signature in cursive script, reading "Cynthia A. Finley". The ink is dark and the signature is fluid, with a large, stylized 'C' at the beginning.

Cynthia A. Finley  
Director, Regulatory Affairs