



OFFICE OF GROUND WATER AND DRINKING WATER

WASHINGTON, D.C. 20460

SOLICITATION OF PUBLIC COMMENT FOR PROJECT-SPECIFIC BUILD AMERICA, BUY AMERICA NONAVAILABILITY WAIVER PROPOSAL

SUBJECT: UNDER EVALUATION: Project-Specific Nonavailability Waiver of Build America, Buy America Act (BABA) Requirements to the City of Iuka, Kansas, for the Iuka Water System Improvements 2024 project, for point-of-use reverse osmosis treatment units.

Introduction:

This solicitation of public comment by the U.S. Environmental Protection Agency (EPA) is to evaluate a BABA waiver request submitted by an assistance recipient based on nonavailability of product(s) for a single project.

This solicitation of public comment does not represent a final agency decision. The purpose of this proposal is to inquire whether potential BABA-compliant products may be available that were not identified by the assistance recipient or through the EPA's domestic product research efforts, and whether other factors should be considered in the evaluation of a waiver.

The EPA has completed its market research efforts and was unable to identify BABA-compliant products meeting the performance-based specifications, in sufficient and reasonably available quantities and of a satisfactory quality. The EPA makes every effort to locate BABA-compliant products through its waiver process, and the public comment period provides a meaningful opportunity to vet the Agency's interim research. In the EPA's experience, a viable BABA-compliant product is identified through public comment in many cases. Through this public comment period, commenters may provide information that indicates a waiver may not be needed. For example, if a specified item is found to be domestically available, the EPA would not issue a final waiver.

Public comments are requested for 15 days (specific dates noted on the EPA's website). Please submit comments to BABA-OW@epa.gov. Please include information in the subject of the email identifying it as a public comment on this waiver request, such as "Waiver Comment: Iuka Water System Improvements 2024" or similar.

Background

The Buy America Preference set forth in section 70914 of the BABA included in the Infrastructure Investment and Jobs Act (Pub. L. No. 117-58), requires all iron, steel, manufactured products, and construction materials used for infrastructure projects under Federal financial assistance awards be produced in the US.

Under section 70914(b), the EPA may waive the application of the Buy America Preference, in any case in which it finds that: applying the domestic content procurement preference would be inconsistent with the public interest; types of iron, steel, manufactured products, or construction materials are not produced in the US in sufficient and reasonably available quantities or of a satisfactory quality; or the inclusion of iron, steel, manufactured products, or construction materials produced in the U.S. will increase the cost of the overall project by more than 25 percent. All waivers must have a written explanation for the proposed determination; provide a period of not less than fifteen (15) calendar days for public comment on the proposed waiver; and submit the proposed waiver to the Office of Management and Budget's (OMB) Made in America Office for review to determine if the waiver is consistent with policy.

Summary

Proposed Waiver: The Environmental Protection Agency is soliciting comments regarding whether to issue a project waiver of the requirements of section 70914 of the BABA included in the Infrastructure Investment and Jobs Act (Pub. L. No. 117-58), for used in an infrastructure project funded through the Capitalization Grants for Drinking Water State Revolving Funds.

Waiver Type: Nonavailability of a BABA-compliant product in sufficient and reasonably available quantities or of a satisfactory quality.

Waiver Level and Scope: Project level waiver for a single project. No other project will utilize the waiver.

Proposed Waiver Description: Project-Specific Nonavailability Waiver of Build America, Buy America Act (BABA) Requirements to the City of Iuka, Kansas, for the Iuka Water System Improvements 2024 project, for point-of-use reverse osmosis treatment units.

Project Summary: The City of Iuka, Kansas is undertaking a water system improvements project to address nitrate contamination and aging infrastructure within its public water supply system. The project includes installing point-of-use reverse osmosis (POU-RO) treatment units at all service connections to reduce nitrate levels below the EPA and KDHE Maximum Contaminant Level; replacing aging valves and meters; recoating the interior of the existing 100,000-gallon elevated water tower with an NSF-compliant epoxy coating; and completing structural, piping, and electrical repairs at the existing well house.

Length of the waiver: From the effective date of the final waiver until December 31, 2027.

Summary of Items Covered in the Proposed Waiver (including NAICS):

The applicant is seeking a waiver for point-of-use reverse osmosis treatment units.

Point-of-Use Reverse Osmosis Treatment Unit:

- NAICS: 333318
- PSC: 4610

The applicant proposes to procure products that are manufactured in the United States, but the manufacturer has indicated that they are not BABA-compliant.

Description of Efforts Made to Avoid the Need for a Waiver

Both the Kansas Department of Health and Environment and the EPA made every effort to obtain BABA-compliant POU reverse osmosis treatment units. This is both documented in the waiver request, and in the description of EPA's extensive research efforts listed below.

Market research concluded on November 7, 2025. The market research process included thorough review of the waiver request submission, examination of domestic manufacturer catalogs and other technical data and marketing materials, personal communication with domestic manufacturers, inquiries of regional project officers, and outreach to contractors and engineers with expertise and familiarity with the project. During market research the EPA contacted 10 manufacturers of POU reverse osmosis filtration units. No BABA compliant options for the products were found. Based on the technical evaluation conducted, the claim that BABA-compliant products that meet the project's specification are not available is supported.

Description of Award

Recipient Name and/or Unique Entity Identifier (UEI):

Recipient Name: City of Iuka

Recipient Unique Entity Identifier: CD4DY9HZNPD8

Federal Financial Assistance Identification Number (FAIN): 96703003

Federal Financial Assistance Listing Name: 66.468 Drinking Water State Revolving Fund

Federal Financial Assistance Listing Number: 66.468

Federal Financial Assistance Funding amount: \$900,000.00

Total Cost of Infrastructure Expenditures: \$642,000.00

BUILD AMERICA BUY AMERICA WAIVER REQUEST DATA COLLECTION

This data collection is for submitting a waiver request to the Build America, Buy America requirements. According to the Build America Buy America Act (BABAA), “none of the funds made available for a Federal financial assistance program for infrastructure, including each deficient program¹, may be obligated for a project unless all of the iron, steel, manufactured products, and construction materials used in the project are produced in the United States.”

Waivers are explained in the [Office of Management and Budget Memorandum 22-11](#) and required by the [Infrastructure, Investments and Jobs Act](#) (IIJA) sections 70901 through 70952. Each waiver request must provide responses to the form questions, as applicable. Instructions are provided in the next paragraph. [Recipient instructions](#) can be found on pages 9 through 12 of this document. Contact your Federal Agency contact for your award or for additional assistance with completing this data collection.

Instructions: The applicant/recipient/subrecipient need to complete questions 1 through 16, sign and certify the form, and email/submit the waiver request to the Federal agency contact identified in your Federal award notification. The Federal agency will complete questions 1A through 11A. The Federal agency will review and determine to approve or not approve the waiver request.

If additional space is needed, see [attachment instructions](#) on page 8.

Required fields are marked with an asterisk (*)

Questions to be Answered by the Applicant, Recipient, or Subrecipient

1. Submitter Type: * ☒ Applicant ☐ Recipient ☐ Subrecipient

2. Submitter Contact Information

Legal Name *	Unique Entity Identifier (UEI) *	
City of Iuka, Kansas		
Address 1 *		
Address 2		
City *	County/Parish	State
Iuka	Pratt	Kansas
Province	Country *	Zip/Postal Code *
	United States	67066

3. Submitter First and Last Name*

Marsha Giggy

4. Submitter Email *

5. Submitter Phone Number *

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¹ See IIJA, § 70913(c) for description of the term “deficient program.”

6. Describe the infrastructure project description and location, to the extent known. *

The City of Iuka, Kansas is undertaking a water system improvements project to address nitrate contamination and aging infrastructure within its public water supply system. The project includes installing point-of-use reverse osmosis (POU-RO) treatment units at all service connections to reduce nitrate levels below the EPA and KDHE Maximum Contaminant Level; replacing aged valves and meters; recoating the interior of the 100,000-gallon elevated water tower with an NSF-compliant epoxy coating; and completing structural, piping, and electrical repairs at the existing well house.

The project is located within the City of Iuka, Pratt County, Kansas. The project area encompasses approximately 0.5 square miles within the City of Iuka, located in: Sections 3 and 4, Township 27 South, Range 13 West, and Section 34, Township 26 South, Range 13 West, Pratt County, Kansas.

7. Total funding, including federal and non-federal shares: * \$900,000.00

8. Total estimated infrastructure costs, including all federal and non-federal shares (to the extent known): * \$642,000.00

9. Is this waiver for a specific product or a category of products? Check one below: *

- a. ☒ Specific Product
b. ☐ Category of Products

10. Listing of Materials, Technical Specifications, and Quantity: *

List of iron or steel items, manufactured products, and construction materials proposed to be excepted from BABAA requirements, including name, cost, countries of origin (if known), and relevant Product Service Code (PSC) and North American Industry Classification System (NAICS) code for each. List each item separately. List the name of the product, how much the product costs, in U.S. dollars, the country or countries of origin, if known, and the relevant PSC and NAICS for each product. Links to manuals that provide the PSC and NAICS codes:

- PSC Codes: <https://www.acquisition.gov/psc-manual>
- NAICS Codes: <https://www.census.gov/naics/>

This waiver request was submitted to the EPA by the State of Kansas and only applies to the project in the subject line. All supporting documentation included as part of this waiver request were submitted by the recipient to provide an appropriate level of detail and context for the submission. There may be documents with project diagrams, schedules, and correspondence in formats that do not meet the Federal accessibility requirements for publication on the Agency's website. Hence, these exhibits have been omitted from this waiver publication. They are available on request by emailing DWSRFWaiver@epa.gov.

10.1 Technical specification descriptions of items to be waived, if applicable.

(POU RO) Drinking Water Treatment Unit:

- Certified under NSF/ANSI Standard 58 for nitrate reduction
 - Four-stage reverse osmosis treatment system, including sediment prefilter, activated carbon filter, reverse osmosis membrane, and post-carbon polishing filter.
 - System Production: 14 gallons per day (GPD)
 - Avg. TDS Reduction: 93%; Efficiency Rating: 22%; Recovery Rating: 38%
 - Includes performance indication device and/or automatic shutoff device integral to the treatment unit per KDHE standards for POU units used in public water supplies.
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10.2 Quantity required: 82 (one per active consumption point within the City of Iuka)

11. Waiver Type *

Choose one of the three waiver types listed in this section and only answer the questions applicable to the chosen waiver type.

- **Nonavailability waivers:** Complete questions [11.1.1](#), and [11.1.2](#).
 - **Unreasonable Cost waivers:** Complete questions [11.2.1](#), [11.2.2](#), and [11.2.3](#).
 - **Public Interest waivers:** Complete question [11.3](#).
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11.1 ☒ Nonavailability Waiver

Applicable responses to the following are required:

11.1.1 A description of the due diligence performed by the applicant, including names and contact information of the manufacturers, distributors, or suppliers contacted for quotes (minimum 3), and the responses provided.

The City's consultants contacted multiple suppliers and manufacturers between July and October 2025 to confirm availability of BABA compliant units. Each respondent indicated that no POU RO system for nitrate removal exists that meets the requirement of BABA and the KDHE POU and POE Treatment Device Policy. All qualifying models rely on imported membranes, filters, or assembly.

See attached PDF "Question 11.1.1" for supporting documentation.

11.1.2 If one or more respondent indicated that they could provide a Build America Buy America (BABA) compliant item, but you are requesting the non-availability waiver because the lead time to obtain the BABA compliant item is excessive, indicate below how the difference in lead time between a BABA compliant and non-compliant item is going to cause the project to miss a significant milestone or deadline.

No domestic alternatives were identified; therefore, no lead-time comparison is applicable. Use of non-compliant imported components is required for the project to proceed and maintain compliance with KDHE nitrate standards in a timely manner.

11.2 ☐ Unreasonable Cost Waiver (BABA compliance increases total project cost by more than 25 percent)

Applicable responses to the following are required:

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- 11.2.1 What is the additional cost of the BABA compliant items, compared to using iron and steel, manufactured products, and construction materials of non-domestic or unknown origin? Attach documentation of prices for BABA compliant and non-compliant items for items to be included in the cost comparison. Attach an additional PDF file if needed. (See page 8 for [attachment instructions](#))

N/A

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- 11.2.2 What is the additional administrative cost for compliance with the BABA requirements? Attach a certification from the engineer or architect attesting to the actual or expected additional administrative cost. Attach an additional PDF file if needed. (See page 8 for [attachment instructions](#))

N/A

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- 11.2.3 The BABA requirements will be waived for individual items until the total additional cost of BABA compliance is less than 25 percent of the total project cost. Which items is the applicant requesting to be waived from the BABA requirements to reduce costs below the 25 percent cost threshold?

N/A

11.3 ☐ Public Interest Waiver

Explain how waiving the BABA requirement for this project or product serves the public interest.

N/A

12. Additional Waiver Information

Provide any additional information for the Agency's consideration of the requested waiver.

The City of Iuka's Public Water System has been out of compliance with the Maximum Contaminant Level (MCL) for nitrates since February 2022. The City engaged [REDACTED] to evaluate alternatives and identify the most feasible and cost-effective solution to return the system to compliance. With approximately 81 active service connections serving an estimated population of 140, installation of point-of-use (POU) reverse osmosis (RO) treatment units was determined to be the preferred alternative. The City has secured a Kansas Water Supply Loan Fund ([REDACTED] loan with principal forgiveness as a disadvantaged community. A Preliminary Engineering Report (PER) and Waste Stream Summary have been submitted to and approved by KDHE, with an agreed-upon recommended alternative. Use of the secured loan funds is necessary to advance the project, and a BABA waiver for the POU RO units is required to proceed with bidding and construction.

13. Anticipated Impacts *

Identify any anticipated impacts if no waiver is issued. Attach additional PDF pages if needed.

(See page 8 for [attachment instructions](#))

The City of Iuka has secured funding through KPWSLF to address Nitrate MCL non-compliance. An approved PER has identified POU RO treatment as the recommended solution. Without issuance of a waiver, the City will be unable to procure treatment units using the secured loan funds and cannot afford alternative solutions. The inability to install approved treatment units would delay regulatory compliance, prevent the City from providing safe drinking water to residents, and will result in continued MCL violations, enforcement action, and the need for costly interim bottled-water alternatives. Issuing this waiver will allow the City to proceed promptly with installation of safe, KDHE-approved POU RO units to protect public health and achieve compliance with federal and state drinking water standards.

14. Certifying Official Name: * Marsha Giggy

15. Certifying Official Signature: *

16. Date of Certification: * 10/17/2025

DRAFT 11/4/2025**SECTION 46 07 13****POINT OF USE WATER TREATMENT UNIT****PART 1 GENERAL****1.01 SCOPE OF WORK**

- A. The work under this section includes furnishing and installing Point of Use water treatment units in all places of consumption including homes, business and public places connected to the City's water system.
- B. Under Item 1.03 of this Section is the inorganic water analysis from the City's water wells for the suppliers and manufacturers use in determining the appropriate water treatment unit for this application. See paragraph 1.03 below.
- C. Point of Use water treatment units shall be capable of removing nitrate to the acceptable level as outlined under Item 2.01 of this Section.
- D. Units shall be NSF/ANSI 58 certified for nitrate reduction, with all components supplied by one single manufacturer.
- E. Units shall be installed in under sink cabinet unless otherwise agreed upon with the property owner and City.
- F. Each unit shall include a TDS failure monitor light mounted on the dispenser faucet.
- G. The **Owner** will furnish the **Contractor** with a list of names, addresses and phone numbers for the installation of each Point of Use Device. The **Contractor** shall be responsible for contacting and coordinating with each property owner for the installation of the units.
- H. The Point of Use units will be owned and controlled by the City of Iuka, Kansas. The maintenance of the units is the responsibility of the City and is to be contracted with the **Contractor** installing the units. A yearly maintenance contract, renewable at the **Owner's** option and **Contractor's** concurrence, shall be included as part of this contract. The particle and carbon filters shall be replaced on an as needed basis, with a maximum of a yearly basis, and the RO membranes and polishing filters shall be replaced every 3-5 years, or as needed, and the batteries for the TDS monitoring system shall be replaced yearly, or as needed.
- I. The **Contractor** bidding, installing and maintaining the water treatment units shall maintain a staffed office with a parts inventory within 45 miles of the City of Iuka.

1.02 BUILD AMERICA, BUY AMERICA ACT (BABAA) COMPLIANCE

- A. Construction Materials, Iron, Steel and Manufactured Products used in this project shall comply with the Build America, Buy America Act (BABAA) requirements mandated by Title IX of the Infrastructure Investment and Jobs Act ("IIJA"), Pub. L. 177-58. **Construction materials, iron, steel, and manufactured products must be produced in the United States, and certifications of such production must be provided to Owner prior to installation.**

1.03 SUBMITTALS

- A. Submit in accordance with Section 01 33 00 – **Submittals**.
- B. Prior to procurement, submit for review manufacturer's product specifications and performance data for each system component, including all filters, RO membrane, storage tank, TDS failure monitor light, dispensing faucet with air gap siphon break backflow prevention for the drain line in sufficient detail to demonstrate compliance with these Specifications.

- C. The submittal for the reverse osmosis membrane shall be NSF/ANSI 58 certified for nitrate reduction. The Point-of-Use reverse osmosis system shall be from a single manufacturer and shall be certified under NSF/ANSI Standard 58 to include material safety (release of contaminants by wetted surfaces) and structural integrity (leak/burst testing).
- D. At Project closeout, submit 5 copies of record drawings, including the address location of each Point of Use water treatment unit installed; description of where each unit was installed, i.e. under sink, etc.; a copy of the operation and maintenance/Owner's manuals shall be reviewed with each occupant and a copy of the manual left with the occupant; and six additional copies of the manual shall be given to the City. Manuals shall include:
1. Preventive maintenance schedules and time requirements.
 2. Complete operational instructions, including emergency procedures.
 3. Complete parts lists and recommended spare parts to be kept on hand.
 4. Precautions and safety measures for operation, maintenance, and repair.
 5. Tips for efficient operation; troubleshooting guide and procedures.
 6. Name, address, and telephone of nearest authorized repair and service.
 7. NSF/ANSI Standard 58 certification for the POU RO System.

1.04 QUALITY ASSURANCE

- A. All units installed shall produce water which conforms to the current Drinking Water Standard for nitrate and NSF/ANSI 58 for nitrate reduction.
- B. Inorganic Water Analysis:

**Iuka Water Well Analysis
Wells No. 1 & 2**

Parameter	Wells No. 1 & 2	Units
	February 2025	
	Analytical Result	
Alkalinity, Total	240	mg/L
Aluminum	< 10	ug/L
Antimony	< 1.0	ug/L
Arsenic	1.6	ug/L
Barium	380	ug/L
Beryllium	< 1.0	ug/L
Cadmium	< 1.0	ug/L
Calcium	110	mg/L
Chloride	150	mg/L
Chromium	10	ug/L
Conductivity @ 25C UMHOS/CM	1000	UMHO/CM
Copper	8.3	ug/L
Corrosivity	0.85	LSI
Fluoride	0.27	mg/L
Hardness as CaCO ₃	300	mg/L
Iron	0.22	mg/L
Lead	< 1.0	ug/L
Magnesium	7.8	mg/L
Manganese	4.0	ug/L

Mercury	< 0.50	ug/L
Nickel	26.00	ug/L
Nitrate (N)	11.00	mg/L
pH	8.0	pH unit
Potassium	4.4	mg/L
Selenium	2.4	ug/L
Silica	23.00	mg/L
Silver	< 1.0	ug/L
Sodium	87.00	mg/L
Sulfate	27	mg/L
Thallium	< 1.0	ug/L
Total Dissolved Solids	760	mg/L
Total Phosphorus (P)	0.12	mg/L
Zinc	0.01	mg/L

PART 2 PRODUCTS

2.01 POINT OF USE WATER TREATMENT UNIT CERTIFICATION

- A. The Point of Use water treatment unit shall have been tested and certified to ANSI/NSF International Standard 58, Reverse Osmosis Drinking Water treatment systems, for effective reduction of Nitrate. The concentration of Nitrate in water entering the treatment unit shall be reduced to a concentration less than or equal to the permissible limit for water leaving the system, as specified in NSF/ANSI 58. The Nitrate removal shall be as follows:

Nitrate: Influent Challenge Concentration of 27 mg/L +/- 10%; Max. Permissible Product Water Concentration of 10 mg/L; Minimum Percent Removal of 66.7%; and Average Percent Removal of 80%.

- B. The Point-of-Use reverse osmosis system shall be from a single manufacturer and shall be certified under NSF/ANSI Standard 58 to include material safety (release of contaminants by wetted surfaces) and structural integrity (leak/burst testing).

2.02 POINT OF USE WATER TREATMENT UNIT

- A. [REDACTED], or equal.
- B. Sediment/Carbon Prefilter: 5 Micron/Activated Carbon Block Filter, [REDACTED], or equal, for reduction of sediment rust scale dirt and extra fine sand silt. Particle filter shall be certified for potable water.
- C. Reverse Osmosis Membrane: Thin film composite (T.F.C.), [REDACTED], or equal, certified under NSF/ANSI Standard 58 and certified for reduction of nitrates.
1. Production Rate: 41-53 gpd at 65 psi, 77° F, 250 ppm TDS influent.
 2. Recovery Rating: 38%, without storage tank.
- D. Carbon Post Filter: Granulated (AC) Activated Carbon, [REDACTED], or equal, shall be certified for potable water.
- E. In-Line Carbon Post Filter: In-Line Activated Carbon Filter, [REDACTED], or equal.
- F. Dispensing Faucet: Standard with [REDACTED], or equal. Rotary operation, stainless steel with built-in air gap siphon break.
1. Color: Polished chrome.

- G. Storage Tank Capacity: The tank shall have a minimum of 1.8-gallon capacity. Additional locations requiring larger storage tanks and/or booster pumps to meet demand may be determined at install and additional costs addressed by **Change Order** at unit price.
- H. TDS level monitor:
 - 1. TDS level monitor to check the TDS level of the drinking water each time the dispenser faucet is used.
 - 2. Green LED indicator mounted in the faucet shall signal if the TDS level is below the setpoint, Amber signal appears if it is above the setpoint.
- I. Automatic Shut Off Switch When Storage Tank Is Full:
 - 1. Each unit shall have an automatic switch which will shut off the feed water when the storage tank is full.
- J. Shut off Valve where unit is connected to the water supply line and all piping, hangers, brackets, braces and appurtenances for a complete, neat and workman like installation and usable unit.

PART 3 EXECUTION

3.01 SYSTEM FLOW SEQUENCE:

- A. Sediment/Carbon Prefilter.
- B. Reverse Osmosis Membrane Filter.
- C. Activated Carbon Filter.
- D. Storage Tank.
- E. Polishing Filter (In-Line Carbon Post-Filter).
- F. Dispensing Faucet.

3.02 PRE INSTALLATION PREPARATION:

A. FILTER ASSEMBLY:

- 1. Manufacturer's instructions shall be followed for assembly.

B. SANITIZE FILTER ASSEMBLY:

- 1. The system shall be sanitized with either 5 ¼% liquid chlorine bleach.
- 2. Follow manufacturer's directions to sanitize filter assembly. **Contractor** to replace any RO filters damaged during sanitizing with no additional cost to **Owner** or householder.

C. INSTALL FILTER CARTRIDGES

- 1. Follow manufacturer's direction to install filter elements.

D. FLUSH RO MEMBRANE FILTER:

- 1. The RO membrane filter must be flushed prior to use. Follow Manufacturer's instructions.
- 2. Allow the product water and flushing water to flow to a suitable drain.

E. STORAGE TANK PREPARATION:

1. Check air pressure in the empty storage tank using tire gauge with 1 psi increments. Air pressure should be between 5 and 7 psi, or as recommended by manufacturer. Use a bicycle-type hand air pump to increase the air pressure if needed, or depress the stem of the air valve to decrease the pressure.

3.03 INSTALLATION

- A. Install each unit in accordance with local plumbing codes and the manufacturer's recommendations.
- B. Exact placement of the components will vary by installation. Install unit beneath a sink or in an adjacent cabinet with the approval of the City. Regardless of where the system is installed, the flow sequence described in 3.01 must be observed.
- C. Installation under or near a sink is preferred due to the close proximity to cold water and drain lines.
- D. Lengths of 1/4" and 3/8" OD plastic tubing will be required to complete the installation. When cutting plastic tubing, use a sharp razor blade. Cut the tubing squarely. Extra plastic tubing is subsidiary.
- E. A length of drain tubing is required to install the air gap siphon break. Drain tubing is subsidiary.
- F. Installation shall be as neat as possible.
- G. The drain line shall be connected to the air gap siphon break built into the faucet with a straight vertical path with no loops or low spots. If incorrectly installed, the unit will overflow at the air gap siphon break built into the faucet, or make irritating gurgling sounds. The concentrate line that leads to the faucet should be installed in a straight vertical path to avoid making a gurgling noise. There should be no undersink obstructions which would prevent smooth tubing runs to the drain connection, carbon post filter or RO module assembly. Do NOT connect the system drain line to a dishwasher drain or near a garbage disposal.
- H. The filter system assembly is designed to be mounted on any rigid vertical surface such as a cabinet sidewall, sheetrock or exposed stud. It should be positioned such that there is access to an inlet water source and drain. The installation should also allow convenient access for servicing.
- I. Dispenser Faucet is to be mounted on the rear lip of the sink. It may be installed in an existing sprayer attachment hole or in a hole drilled at the time of installation. It may also be mounted to an adjacent counter top. It should be positioned so that water is dispensed over the sink. A 1 1/4" diameter hole is required. Faucet can be installed for left or right-handed operation. Dispenser location shall be coordinated with the home occupant. See sink drilling instruction from RO system manufacturer. **Contractor** shall replace/repair any sink/countertop damaged during installation at no additional cost to the **Owner** or homeowner.
- J. Install the TDS monitor according to manufacturer's instructions. Make certain the TDS level setting corresponds to the customer's water supply.
- K. Locate filter system assembly near a cold-water line to provide the water source for the system.
- L. Drain connection: Make connection through an air gap siphon break, then into drain above the P-trap or into a floor drain. Care should be taken when entering drains near dishwashers or garbage disposals as back flow may occur through the air gap and cause flooding.
- M. Care must be taken to avoid over-tightening screws thereby breaking plastic parts.
- N. Avoid assembly and disassembly while installing product water tube. Repeated assembly and disassembly will cause wear to the inner body. Any damage to the water treatment unit due to assembly and disassembly will cause the unit to be rejected and **Contractor** will be required to replace unit at no additional cost to the **Owner** or homeowner.

- O. Reservoir Tank Placement: Place the reservoir tank in the location selected and secure in place.
- P. Install Filter System Assembly: Install mounting bracket using template provided, using screws and wall anchors or toggle bolts as necessary for secure installation of unit.

3.04 START-UP

- A. Follow all manufacturer's instructions specific to unit for installing modules and membranes, rinsing the system, rinsing the membranes, and wait times required prior to use.
- B. Make a complete system check and adjust as needed to correct any leaks
- C. Run product water through the faucet to flush out any remaining carbon dust from the post filter.
- D. Perform a final module check to verify proper product performance.
- E. Thoroughly clean up the equipment and the installation site.
- F. Review operation of point of use unit with customer.

3.05 WARRANTY

- A. The Point of Use Units shall have a one-year warranty on all parts, labor and installation. Replacement of the particle and carbon filters at the end of the first year shall be included as described in the one-year maintenance agreement under Section 46 07 15 – ***Maintenance Agreement***. In addition to the one-year warranty, the units shall have a company standard lifetime limited warranty for the units installed. A copy of the warranty shall be furnished to the ***Owner*** upon request.

END OF SECTION