



## MEMORANDUM

Date: July 17, 2015  
To: Guardian Customer Service and Sales Teams  
From: Keith Flamich  
Re: Guardian Products and the Safe Drinking Water Act (SDWA)

Attention Guardian Customer Service and Sales,

This memo addresses concerns regarding the Environmental Protection Agency's Safe Drinking Water Act (SDWA) and whether Guardian products and components must comply with its lead-free requirements.

Based on email correspondence with the EPA, Guardian eyewash and shower units are exempt under Section 1417(a)(4) of the SDWA. The following excerpt is quoted directly from the attached email written by the EPA and verifies the exemption status:

*"Plumbed eyewash devices and emergency showers are not subject to the prohibitions in Section 1417 of SDWA. Section 1417(a)(4)(B) exempts shower valves, and therefore an emergency shower would be exempt under that provision of the Act. A plumbed eyewash device, on the other hand, would be exempt under Section 1417(a)(4)(A) because it is used exclusively for nonpotable services – eyewashing. Although an eyewash device could theoretically be misused to ingest water (like outdoor watering devices), it is plainly not the purpose of the device and therefore the mere possibility of misuse would not subject it to the new definition of lead free."*

The information above (and attached) confirms the exemption of plumbed eyewash and shower devices from the lead-free requirements as set forth by the SDWA. Thank you for your attention and concern regarding this matter.

Best Regards,

A handwritten signature in black ink, appearing to read "Keith Flamich".

Keith Flamich  
Marketing Manager  
Guardian Equipment

### EMERGENCY EYEWASH & SHOWER TECHNOLOGY

Guardian Equipment 312 447 8100 TELEPHONE  
1140 N North Branch St 312 447 8101 FACSIMILE  
Chicago, IL 60642 gesafety.com

Dear ISEA Eyewash and Shower Group Members,

I understand there has been concern about how and if EPA's Safe Drinking Water Act covered plumbed eyewash and showers. EPA has responded to concerns expressed by ISEA EWS members. EPA's Office of Groundwater and Drinking Water has responded, via EPA's Office of General Counsel. The response is included below.

Please contact me or Cristine with any additional questions.

Sincerely,

Dan Glucksman

**Daniel I. Glucksman**  
Public Affairs Director  
**International Safety Equipment Association**  
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Dear Mr. Glucksman –

I've coordinated with the Office Of Groundwater and Drinking Water (Lisa Christ) and they are comfortable with this answer to your questions:

Plumbed eyewash devices and emergency showers are not subject to the prohibitions in Section 1417 of SDWA. Section 1417 (a)(4)(B) exempts shower valves, and therefore an emergency shower would be exempt under that provision of the Act. A plumbed eyewash device, on the other hand, would be exempt under Section 1417(a)(4)(A) because it is used exclusively for nonpotable services – eye washing. Although an eyewash device could theoretically be misused to ingest water (like outdoor watering devices), it is plainly not the purpose of the device and therefore the mere possibility of misuse would not subject it to the new definition of lead free.

I hope this is helpful to ISEA and its members.

Leslie Darman  
U.S. Environmental Protection Agency  
Office of General Counsel  
Tel: