



# In Brief

To: Bradley Customers - All  
From: Darnell Wesson  
CC: Product Management  
Date: April 18, 2014

On April 18, 2014 Bradley completed the transition from lead-free compliant products to NSF372 Lead-Free certified products.

As of January 4, 2014, the Reduction of Lead in Drinking Water Act took effect. This act required plumbing parts that touch water and are anticipated to be used for human consumption must have less than or equal to 0.25% weighted average in lead content.

With this transition, Bradley products, including service parts and kits, will be NSF certified to the Reduction of Lead in Drinking Water Act of having less than or equal to 0.25% weighted average in lead content, with some exceptions.

## Exempt Products

Showers product line, toilets, urinals, hose boxes, and the related service parts for those products. Exemptions for these products are covered under Safe Drinking Water Act (SDWA) Section 1417 (a)(4)(B).

Emergency Fixture product line

Quoted per direct feedback from the EPA's Office of Groundwater and Drinking Water, "Eyewash devices and drench showers are not subject to the prohibitions in Section 1417 of SDWA. Section 1417(a)(4)(B) exempts shower valves, and therefore the drench shower is exempt under that provision of the Act. An 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 the 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 EPA is working on publishing this information at a later date. EPA reference is attached on page 2.

For a detailed list of compliant products or additional information on lead-free please visit our website [www.bradleycorp.com/lead-free](http://www.bradleycorp.com/lead-free) or to ask questions please email, [BradleyLeadFree@bradleycorp.com](mailto:BradleyLeadFree@bradleycorp.com).



EPA Reference:

**Stoll, Richard G.**

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**From:** Darman, Leslie [REDACTED]  
**Sent:** Friday, December 13, 2013 10:31 AM  
**To:** Stoll, Richard G.  
**Cc:** Christ, Lisa; Wehling, Carrie  
**Subject:** RE: Draft Leslie Darman Dec 2013.docx

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

Eyewash devices and drench showers are not subject to the prohibitions in Section 1417 of SDWA. Section 1417 (a)(4)(B) exempts shower valves, and therefore the drench shower is exempt under that provision of the Act. An 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 the 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 expect this is sufficient for your needs. [REDACTED]

[REDACTED]

Leslie Darman  
U.S. Environmental Protection Agency  
Office of General Counsel  
[REDACTED]