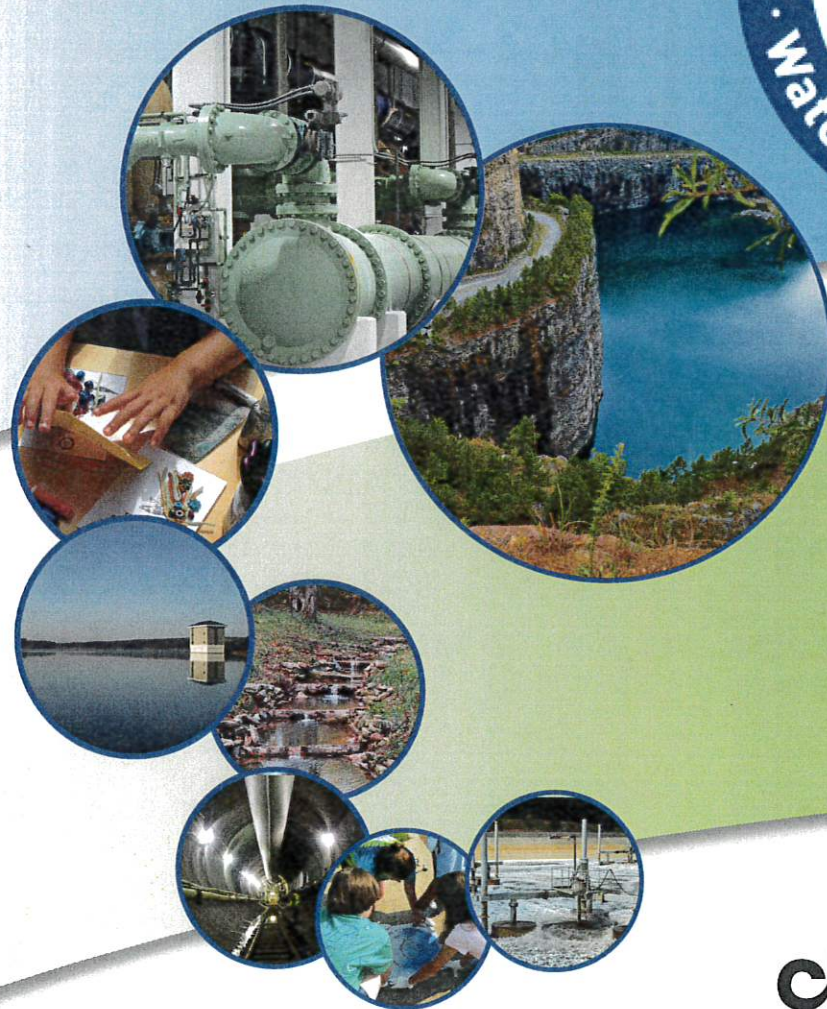
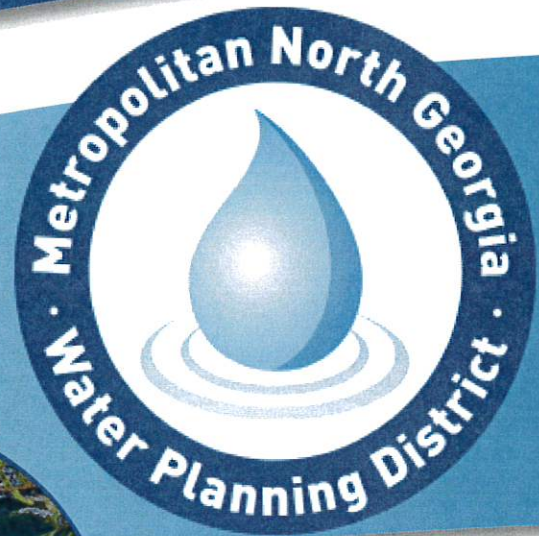


# WATER RESOURCE MANAGEMENT PLAN



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**BLACK & VEATCH**

June 2017

*Amended December 2020*

ACTION ITEM**WSWC-6: TOILET REPLACEMENT PROGRAM**

Intent	Responsible Party	In Coordination With
To reduce indoor water use and speed the conversion of older, inefficient toilets toward WaterSense labeled ultra high-efficiency toilets in single- and multi-family homes.	Local Water Provider	Local Government Local Wastewater Provider
<b>Points of Integration</b>		
This measure should result in decreased water demands, as well as decreased wastewater flows.		

**Action Item:** Implement a program to replace older, inefficient toilets with WaterSense labeled high-efficiency toilets using 1.1 gpf or less (WaterSense UHET) in single- and multi-family homes. WaterSense labeled toilets using 1.28 gpf will no longer be eligible for rebates after July 1, 2021.

**Sub-Tasks:** Each local water provider shall:

1. Establish a program to replace 3.5 gpf or greater toilets in single- and multi-family homes constructed prior to 1994 with WaterSense UHETs.
2. Provide information on opportunities to recycle any toilet being discarded pursuant to the toilet replacement program by linking to the Metro Water District website or other local resources.

**Description:** Single- and multi-family homes built prior to 1994 may contain inefficient toilets. While new toilets meet high efficiency standards, the replacement of older, inefficient toilets is needed to address existing stock and reduce indoor water use.

**Implementation Guidance:** Before the 1950s, new toilets typically used 7 gpf. By the end of the 1960s, new toilets typically used 5.5 gpf; in the 1980s, new toilets typically used 3.5 gpf. The federal Energy Policy Act of 1992 required all new toilets use no more than 1.6 gpf by 1994. In 2010 the Georgia Water Stewardship Act required that local governments adopt or amend local ordinances to require, among other things, that all new construction, on or after July 1, 2012, use WaterSense labeled toilets. WaterSense is a voluntary program of the EPA designed to identify and promote water efficient products and practices. WaterSense labeled toilets are independently certified to meet rigorous criteria for both performance and efficiency. Today, WaterSense UHETs are increasingly available with efficiency levels of 1.1 gpf or less.

This Action Item calls for a program to replace toilets in single and multifamily homes constructed prior to 1994 with WaterSense UHETs.

The toilet replacement program must specifically address toilet replacement rather than provide toilet retrofit devices. Examples of acceptable toilet replacement programs include the following:

- Rebate incentive program: Customer receives a water bill credit, cash or voucher to offset the cost of a new WaterSense UHET to be installed in a pre-1994 single- or multi-family home. Rebates shall be \$75.
- Direct install program: Customer exchanges a toilet from pre-1994 single- or multi-family homes for a WaterSense UHET with discounted installation through the local water provider.
- Other: Local water providers may create their own programs as long as the program actually results in the replacement of toilets in pre-1994 single- and multi-family homes with WaterSense UHETs. These programs may take a variety of forms, including but not limited to on-bill financing programs for toilet

replacements and programs requiring that toilets using 3.5 gpf or more be replaced as a condition of a customer establishing water service.

If a local water provider chooses to have a single replacement program covering both single and multi-family homes, funds may be made available on a first come, first served basis.

As a matter of customer service, rebates of 1.28 gpf may still be allowed as a hardship exception when a customer in good faith purchases a dual-flush toilet with one flush at 1.1 gpf or less or uses an outdated paper rebate application form provided by a retailer.

Due to the high value of rebate programs for multi-family homes, it is recommended that the local water provider include an inspection element in any multi-family rebate program to prevent possible fraud. This can be done through a physical inspection or by reviewing billing data post-installation.

The local water provider should provide information on available toilet recycling opportunities. There are recycling facilities in the region that will recycle crushed porcelain for various uses, such as a concrete aggregate or bathroom tile. Many homeowners may not be aware of recycling options when replacing a toilet.

**Considerations for Enhanced Implementation:** The optional considerations for enhanced implementation include the following:

- Add an additional requirement that program participants provide documentation or other proof that the replaced toilet uses 3.5 gpf or more, such as requiring a section on the rebate application form for the customer to record the gallons per flush of the old toilet or including a customer self-certification.
- Low-income and disadvantaged customers often live in pre-1994 single- and multi-family homes and spend a greater percentage of their income on utility bills. These customers may experience financial difficulties participating in a rebate incentive program if they cannot afford to purchase the new plumbing fixture before the rebate money is received. A voucher or direct install program for customers with a lower household income would encourage indoor water efficiency in pre-1994 single- and multi-family homes. As an example, the City of Atlanta's Care and Conserve program provides payment assistance to qualified customers.
- Local water providers may also consider placing toilet recycling containers at other local government buildings. The City of Atlanta provides free toilet recycling to its residential water customers at the Center for Hard to Recycle Materials. Gwinnett County Water Resources offers free toilet recycling to its residential customers by providing a recycling container for old toilets at its building. Gwinnett County Water Resources covers the cost of transporting the container to a local recycler. This free service is promoted to customers participating in the toilet replacement program and has kept hundreds of tons of porcelain from the landfill.
- Require recycling for all toilets replaced through the multi-family toilet replacement program. Some local water providers require the customer to agree to transport the used porcelain toilets to an approved recycler within the Metro Water District area. The customer must provide documentation from the recycler that the toilets were disposed properly before the rebate credit will be issued to the account.

**Opportunities for Technical Assistance:** The Metro Water District's Technical Assistance Program may provide support for implementation of this Action Item through the following types of activities:

- Administering a regional rebate program for single-family homes
- Creating and administering a regional rebate program for multi-family homes
- Offering a regional program for low-income and disadvantaged customers using grant funding
- Developing a regional list of toilet recycling facilities



**Resources:**

- EPA, WaterSense Toilets, information page, <https://www3.epa.gov/watersense/products/toilets.html>
- MaP Testing Premium Ultra-High-Efficiency Toilet page, <http://www.map-testing.com/content/info/menu/map-premium.html>