



COMMONWEALTH of VIRGINIA

Department of Health
Richmond, Va. 23219

JAMES B. KENLEY, M.D.
COMMISSIONER

September 19, 1979

The Honorable J. C. Buchanan
Senator, Senate of Virginia
P.O. Box 1006
Wise, Virginia 24293

Dear Senator:

At this time I would like to reiterate the position of this agency in regard to Senate Bill 806 which would prohibit the use of pipe containing asbestos. First, I would like to take this opportunity to clarify any misunderstandings that may have resulted from our failure to attend or make comment at the subcommittee's public meetings. We felt that it was not appropriate for a state agency to participate in a meeting intended for public participation. For your information I am attaching my 26 January 1979 letter that originally expressed this same position and our objections. I have written a statement of our position to each legislative member of the subcommittee and do so in order to allow more time at the public hearing for the lay public to express its views before the subcommittee. The policy, to which this Department will adhere unless directed otherwise or unless evidence develops to show a health related hazard exists, is that proper use of pipe containing asbestos is suitable for conveyance of potable water.

This policy is supported by all evidence available at present. This evidence and the latest word on EPA's position was summarized by an EPA scientist at a recent presentation at the National American Water Works Association (AWWA) meeting in San Francisco on 28 June 1979. Two members of my staff were present at this presentation which indicated no formal change in EPA's current policy of allowing the proper use of asbestos-cement (A/C) pipe.

As you realize, many background contaminants are found in our sources of water. Many of these contaminants are natural in their occurrence; therefore people are exposed by natural means to their effects. Asbestos is one such element and is present in varying amounts in all natural water sources. It has also been a substance for which man has found many uses. The forms of use that cause inhalation of asbestos fibers are now known to cause cancer. However, exposure of the human body through drinking water containing asbestos has not been linked with cancer. If it is shown that there is asbestos in drinking water, fibers from either geological erosion or from waste effluents can be filtered out or

minimized by a well-operated plant. The release of fibers from A/C pipe can be controlled by conditioning the water. Therefore, as with pipes made of any material to convey any liquid, the proper selection of the pipe material, in conjunction with the use of conditioning agents, will determine the pipes suitable for bid in any particular water project. The AWWA along with the Asbestos-Cement Pipe Manufacturers recognize this fact in their standards, publications and product literature. The negative results from the 13 February 1979 Chesapeake study illustrates the suitability of A/C pipe for conveyance of certain water as the results showed asbestos in levels that are nonsignificant or below detectable levels.

The Health Department regularly advises localities on the aggressiveness of their waters and recommends a change in treatment practices if waters are found to be corrosive. This action is part of the operating regulations for public waterworks and is applicable to all presently operating waterworks. Plans for proposed waterworks or expansions must be approved by this Department prior to construction and operation; systems with highly aggressive waters are not currently encouraged to be used unless proper conditioning of the water is accomplished when using pipe materials that are subject to corrosion, i.e. cast iron, ductile iron, or asbestos cement.

The arbitrary banning of asbestos cement pipe could indirectly cause health hazards in the Commonwealth by preventing the construction of needed projects. It could also, especially in many poor areas in the state, limit the needed replacement of inadequate water supplies. The monies generally used to finance these projects are grant funds with the local communities providing a small portion. With the banning of A/C pipe this small portion could get much larger. So much larger that the projects could not be financed. For example, Mr. David Feld, Engineer with Farmers Home Administration (FmHA), has been kind enough to provide us with an estimate of the increased costs of water projects if asbestos cement pipe was not a bid option. The estimate is a conservative 10 to 20 percent; 10 percent on actual cost differentials and up to 20 percent on ripple effects from not having the competition of asbestos-cement pipe as a bid option. These figures would hold true for water line construction throughout the state where A/C pipe is a legitimate bid option. As approximately eighty percent of all public water systems serve less than 500 people, the greatest costs will accrue to the smaller systems that can least afford any additional increases. These smaller systems are the ones that generally use smaller size pipes and the cost differentials for alternative pipe materials are greater at smaller sizes. Using the 1979 Dodge Guide, figures show that to construct a section of six inch pipeline of A/C pipe versus cast iron with slip on joints results in a cost differential of 25 percent to use cast iron. To construct one mile of six inch line would cost an additional 8,450 dollars or another 1330 feet (one quarter

mile) of A/C pipe. If cast iron with mechanical joint was used; an additional 29 percent increase, i.e., 9,660 dollars or another 1520 feet (one-third mile) of A/C pipe. FmHA has also informed us that severe state requirements or regulations have caused FmHA monies to be disallowed in the State of Kansas. This type of impact on our local communities must not be allowed unless a proven health hazard is evident.

In conclusion, the Health Department advocates proper use of asbestos-cement pipe until such time as there is clear evidence of related health hazards. We feel that the banning of this pipe as a bid option will unnecessarily raise costs, especially local, and prevent some needed projects from being constructed.

As the agency responsible for the protection of public health in the Commonwealth, we will be the first to take appropriate actions concerning the use of asbestos-cement pipe if convincing evidence comes to our attention that this type of pipe represents a hazard.

Sincerely,

James B. Kenley, M.D.
State Health Commissioner

JBK/TBG/djv
Attachment

Drafted By:

T. B. Gray

Reviewed By:

Earl H. Bartuk