PLAINTIFF'S EXHIBIT

CAP-1131

A/C Pipe Producers Association

Executive Committee
International Affairs Committee

Internal Correspondence

TO

FROM J.F. Welch, Vice President

DATE October 8, 1982

SUBJECT National Academy of Sciences (NAS) - Committee on Safe Drinking Water

REF: JFW correspondence, same title, July 16, 1982

Action Required: review for information

CURRENT STATUS

On October 6, 1982, Staff met with Dr. Robert Golden, Staff Officer for the Safe Drinking Water Committee. The purpose of the meeting was to determine the status of the Committee's reassessment of the medical evidence on asbestos in drinking water.

Dr. Golden reported that the Committee met on September 21, 1982 and approved a draft manuscript on the epidemiological studies of asbestos in drinking water. It should be remembered that the Committee is reviewing only the post-1977 epidemiological studies and no animal feeding studies. Golden characterized the Committee's conclusions regarding the risks of ingested asbestos as "unbelievably tiny." By example, he cited risk assessments (probably from the Kanerek et al studies) in the order of 1.0007. Unity represents no risk. The Committee will probably issue a range of risk estimates in the final report to the Environmental Protection Agency (EPA). Golden pointed out that the above number carries the caveat "this study did not correct for other factors which would further reduce this risk level." The two studies receiving the most attention are the Kanerek et al studies and the Polissar study (see JFW correspondence, U.S. Environmental Protection Agency (EPA) - Epidemiological Study, September 7, 1982).

The EPA water quality criteria for asbestos also were reviewed. The Committee concluded there were errors in the contractor's conversion from inhaled fibers to ingested fibers, as well as errors in making conversions from light microscope observable fibers to transmission electron microscope observable fibers. Golden stated that the Committee "rejected certain conclusions drawn in the water quality criteria." This is reasonably optimistic news.

The Committee will again meet on November 23, 1982. After the revised manuscript is approved, it will be circulated for peer review. Golden is amenable to AACPP recommendations for reviewers. Staff will recommend Drs. Higgins (University of Michigan School of Public Health), and Commins (formerly with the Water Research Centre in England).

Golden also recounted an interesting conversation with Joe Cotruvo, Director of Criteria and Standards, EPA Office of Drinking Water. Cotruvo told Golden that he was "worried about having to issue an asbestos regulation" because

of the Agency's changing policy on the validity of animal feeding studies. (Note: In recent months, Office of Toxic Substances (OTS) officials, notably John Todhunter, have moved away from EPA's historical position that exposure of experimental animals to toxic agents in high doses is a valid method of discovering possible carcinogenic hazards in man. The issue came to the fore with the Agency's apparent decision not to regulate formaldehyde in spite of an animal inhalation study demonstrating increased tumors.) Staff pointed out that this may only be an OTS policy, not an Office of Drinking Water policy and certainly not one held by the preponderance of the medical/scientific community. Staff interprets Cotruvo's remarks to be a signal to Golden that EPA is looking for the NAS review to put an end to the asbestos in drinking water controversy. Golden also felt that Cotruvo's concerns were unfounded because the scientific evidence, in his judgement, simply does not form a reasonable basis for regulating asbestos in drinking water.

Staff will follow up with Golden after the next meeting of the Safe Drinking Water Committee. If you have any questions in the interim, please do not hesitate to call.

JFW/ccw

cc: A. Kahn, Esq.
William E. Smith, M.D.
Brian Commins, Ph.D.

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