



UNI-BELL PVC PIPE ASSOCIATION

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Phone (214) 243-3902 Fax (214) 243-3907

August 19, 1993

TO: Bob Burnett
FROM: Dave Eckstein
SUBJECT: Kansas VCM

It is my opinion as Project Lead on the above matter that policy level input is needed from both of our organizations. It would also seem that joint deliberation would be the most efficient. Therefore, I am requesting a meeting of a Board level delegation from both VI and Uni-Bell in the very near future. I understand that VI currently has a September 7&8 scheduled meeting. It would be our pleasure to join you in Washington if some time can be afforded this most important issue. Uni-Bell would propose to send two or three key members of the Board of Directors and myself as staff liaison to any such meeting.

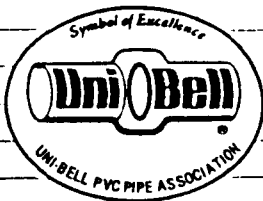
Our goal in meeting would be to discuss the Industry's role in this matter in the future. These discussions would include what we will do, who will do it, who will pay for it and how and when to involve others.

We have all known that a clock is ticking dangerously away on this issue. I do appreciate the VT's attention and resources to date and look forward to serious and expeditious consideration of this request.

Sincerely


Dave Eckstein

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FAX MEMORANDUM

TO: Sub-Committee of PVC Potable Pipe Producers
FROM: Dave Eckstein *[Signature]*
DATE: August 18, 1993
SUBJECT: EPA Meeting Summary and Action Plan Proposed

Attached you will find a summary from the EPA/Industry meeting August 16 in Washington, D.C. I have also taken the liberty of preparing an action proposal for you and the Vinyl Institute's comment.

Certainly, work is still to be done and your input is needed in several areas. To that end, your Sub-Committee Chairman, Jim Rash, has asked that we convene as preliminarily planned on September 2 from 11:00 a.m.-4:00 p.m. at the O'Hare Hilton. Please complete the attached meeting confirmation and return to Jane McDonald on or before August 27, 1993.

We appreciate your continued attention to this most important matter.

DLE/jfm

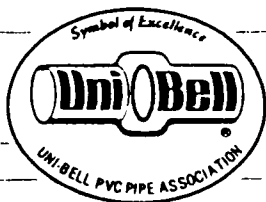
c: Ron Bishop
Jerry Scheid
Ron Cormier
Arthur Kahn
Bob Burnett, Vinyl Institute
✓ Lloyd Ambler, CertainTeed Corp.
Fred Krause, Vinyl Institute Issues Management Chairman
Ron McCreedy, Vinyl Institute Technical Committee Chairman

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Meeting Confirmation

- ☐ I will attend the September 2 meeting.
- ☐ My representative _____ will attend.
(name)
- ☐ No one will attend.

Signed: _____

Signature/Company

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EPA/Industry Meeting Summary

Washington, D. C.

August 16, 1993

Representatives of the Environmental Protection Agency (EPA) and the PVC Industry met at EPA headquarters in Washington, D. C., to discuss the Kansas vinyl chloride monomer issue. In attendance were:

Peter Cook	Deputy Director/Groundwater and Drinking Water	EPA
Steve Clark	Deputy Director/Drinking Water Standards	EPA
Peter Shanagan	Small Systems Coordinator	EPA
Dr. Ken Smith	Vice President/Conformity Assessment	NSF
Ron McCreedy	Technical Committee Chairman	Vinyl Institute
Dave Eckstein	Deputy Executive Director	Uni-Bell

Chronological Review of Work-to-Date:

Dave Eckstein reported on key points to date including the Industry's decision to contract with NSF to perform testing and provide initial liaison with governmental agencies.

NSF Data Presentation

Dr. Ken Smith summarized sampling and testing done on pipe and water from Doniphan Rural Water District #5. The data leads NSF to the following conclusions:

- 1) The pre-VCM certification pipe is the source of the VCM in the water.
- 2) Post-VCM certification pipes are not contributing VCM to the water.
- 3) No other source of VCM appears to exist.

Remediation Alternatives:

Ron McCreedy and Dave Eckstein reported on work accomplished and work planned in the different remediation categories for comment by EPA as to the appropriateness.

Chemical treatment has been concluded to hold no merit as a remediation alternative.

Point of entry devices were discussed with EPA agreeing that they would like to see further work on GAC and ion exchange filtration medias. Further, investigation of bubbling aerators and UV techniques was desirable.

Peter Cook offered that precedent is available for use of point of entry devices (GAC) in Florida for man induced chemical contamination. He feels Industry should show an investigation of all viable alternatives.

Dave Eckstein previewed work to be contracted with Dr. Al Berens by Industry to provide a predictive model for use in purge and or partial new pipe remediation alternatives. EPA again expressed their desire for such a tool.

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Scope and Sampling Protocol:

Dave Eckstein reported that no national data base on rural water systems exists within FmHA. The middle U. S. states are suspect and further detail will come locally. Specific research in Texas was presented.

Peter Cook offered that EPA wants to see Industry scope the rural systems in the mid-U. S. as a whole. From that a scientifically and statistically correct sampling program should be proposed. Mr. Cook felt strongly that Industry should finance the sampling program as in their best interest. No other funding alternative was discussed.

If this sampling results in rare cases, the EPA will issue a low level public notice explaining the rare instance and the criteria of concern (e.g. pre-1977 pipe, small diameter, long dead-ends, etc.). If the sampling results in greater frequency, a higher response from EPA, and Industry in EPA's opinion, will be in order.

Timetable:

Industry committed to a first of October final report on remediations alternatives. The predictive model will also be presented at that time (caveated only by our ability to secure flow data from the currently flooded Doniphan #5).

Industry will also report on overall scope and present a sampling proposal with cost estimate for consideration.

Respectfully submitted,


Dave Eckstein
Deputy Executive Director

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Kansas Vinyl Chloride Monomer Action Proposal
August 17, 1993

<u>Action Step</u>	<u>Assignment</u>
• Finalize remediation alternative report including white sheet on non-viable alternatives by October 1	Vinyl Institute (who specifically?)
• Complete work on predictive model and model checks with field data by October 1	Dr. Al Berens
• Research rural water systems for scope in mid U. S. states	Dave Eckstein
• Prepare scientifically correct and statistically correct sampling proposal from overall scope to include cost estimates by October 1	Dr. Ron McCreedy and Dave Eckstein
• Immediately begin to prepare update risk assessment for VCM	Vinyl Institute
• Prepare speaker packet of our "good story to tell" on PVC and water quality	Uni-Bell and Vinyl Institute
• Follow docket updates to determine P-W Pipe TOSCA 8(e) publication date	Keller & Heckman
• Review the need for further sampling in non-suspect pipe to build the positive data base	Uni-Bell and Vinyl Institute
• Research Kansas Department of Health and Environment (KDHE) testing to add to data base	Dave Eckstein
• Have NSF author final report for Industry review and non-circulation. This would end NSF's contractual involvement and place Industry as it's own contact with EPA, FmHA, KDHE, etc.	Dave Eckstein and Ken Smith
• Determine when and how, non-Uni-Bell or Vinyl Institute members will be involved	Uni-Bell and Vinyl Institute

Please understand that I understand that this is a proposal. You additions, deletions, changes and comments are welcomed.

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