

September 4, 1993

TO: L. C. Ambler

FROM: J. Himmelberger

CC: B. Jo
C. Pontz

SUMMARY OF NOTES: 9/2/93 Uni-Bell Sub Committee of Potable
Water Pipe Producers meeting.

ATTENDEES:	Jim Rash	PW
	Tom Torquevey	Ipex
	Elroy Smith	Diamond
	Bud Layton	JM
	Dennis Bauer	ETI
	Dave Eckstein	Uni-Bell
	Dr. Nina McClellan	NSF
	Ken Smith	NSF
	Art Kahn	

Dave E. did a quick review of the summary sent out covering the EPA/Industry meeting held August 16, 1993. He also handed out a map showing the states deemed to have Rural Water Districts that contain systems that could potentially be troublesome. The attached map indicates the number of RWD in each state. It should be noted that the map does not take size into consideration. Some of the systems in the north contain hundreds of miles of pipe in them.

REVIEW OF ACTION ALTERNATIVES

Sampling Program

Discussion on this topic consumed about half of the meeting time.

~~EPA - Peter Cook, Deputy Director and top EPA man at the meeting,~~
~~strongly suggested that A sampling program be conducted, and that~~
~~Industry should pay for it. The program has to be statistically~~
~~and scientifically sound enough to withstand peer review. He~~
~~indicated that if the program shows a small problem then a small~~
~~response can be expected from EPA, if a big problem, then -----~~

~~Vinyl Institute - The Issues and Management Committee, which is~~
~~the body within The Vinyl Institute (VI) that is responsible for~~
~~action on this issue, has reportedly agreed that a sampling~~

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~~program is appropriate.~~ It is understood that the sampling program is to assess the magnitude of the problem. In an attempt to meet EPA's statistical criteria for the program, VI has had Dow's head statistician develop a proposal for the sampling program. It was discussed (at length!!!) at this meeting, and is very complicated. I'm sure it will be discussed at length at the Sept. 7th meeting. ~~The bottom line is that the recommended~~ program will consist of approximately 800 samples @ \$150 ea (\$120m). Please understand this is just for lab fees to NSF and does not include any cost for gathering, shipping, or coordinating the project. This is a big project.

40 Sample
to each
stat of
Random
1st tier

note: NSF's list price for these samples is \$280 and Dr. McClellan pushed Ken Smith down to \$150, she tried to get him to commit to \$125. My impression from this incident and other things said at the meeting, that NSF wants to be a very cooperative partner in this situation.

~~This recap doesn't come close to capturing the amount of discussion that took place. My thoughts on the major issues that must be satisfied by this "statistical" approach for random sampling are:~~

- ~~1) Satisfy EPA~~
- ~~2) Answer the question of how real the problem is~~
- ~~3) Allow the Industry to unequivocally claim that post NSF certified pipe will not cause a VCM problem.~~

System Model

~~EPA wants a model that can be used to "predict" potentially troublesome systems. VI & Uni-Bell agree with this, and a model is being developed to accomplish this. It is due to be complete by Oct. 1st. Time will not permit the model to be checked against any systems other than Doniphan #5, which is being used to develop the model. There is a high degree of Industry confidence in this effort due to it's author (Dr. Al Berens).~~

Remediation Recommendations

~~The VI is pursuing viable remediation recommendations. Current feedback suggests that there is nothing out there right now. Filters, treatment, lining, forced flushing, etc., are being looked at but there does not seem to be an obvious answer. This also should be a major topic of discussion on the 7th, as EPA is expecting answers on Oct. 1st.~~

~~These three issues represent the external topics for which EPA is expecting answers. The following are subjects of an internal nature that were discussed.~~ by Oct 1st

Speaker Packets

This subject is an extension of the media response sheet that is

in circulation. Dave E. feels that when this problem gains in public awareness, the Industry needs a better damage control program. For now, I think Uni-Bell will mention this subject to VI as an open issue.

Involving Non Uni-Bell/VI Members

The consensus of the group is that other manufacturers need to become involved for two reasons.

- 1) So they can respond with the same story as the rest of the Industry.
- 2) Possibly participate in the funding.

We were told by Dave E. that VI feels this "notification" should take place when the whole package is laid in EPA's lap (ie. when all sampling is done, etc.). I don't think that Uni-Bell agrees with this, but they have no clear cut recommendation. One thought was to discuss the issue at the PPFA meeting in Oct. I am sure this will be discussed on the 7th.

Funding

EPA has made it clear they feel the Industry should step up big time. Uni-Bell leans very heavily toward VI funding this project. They feel it is technically a resin issue, but realize from a marketing viewpoint it is a pipe issue. This position does not allow Uni-Bell to take a strong stand on pushing VI real hard to fund the whole project. While it will be discussed on the 7th, I don't think Uni-Bell has a clear cut position.

Project Lead

Currently VI seems very content (reportedly pleased) to have Dave E. lead the project. Jim Rash has some strong feelings the VI is not "interested" enough, and this makes him very uncomfortable. All seem to agree with this in concept, but feel that if they push the issue and turn the lead over to VI, progress will grind to a halt. I think strong feelings on this subject will get expressed on the 7th. Again, my opinion is that Uni-Bell wants to keep control, but they want a stronger commitment from VI.

Risk Assessment

Work is being done on a "new" approach to risk assessment. The methodology is different from what EPA has used to develop their 2ppb threshold, although reportedly EPA has allowed/used it in some other risk assessments. The people at Dow have used this methodology to assess the VCM risk. It is hinted to show that 25ppb is a more appropriate level of concern. Nobody thinks EPA will buy this number because EPA has a 5ppb threshold set for carcinogens that are considered less dangerous than VCM. As a result, I don't think this will even be mentioned to the EPA.

The feeling seems to be that the work will have some long term value should liability become an Industry problem.

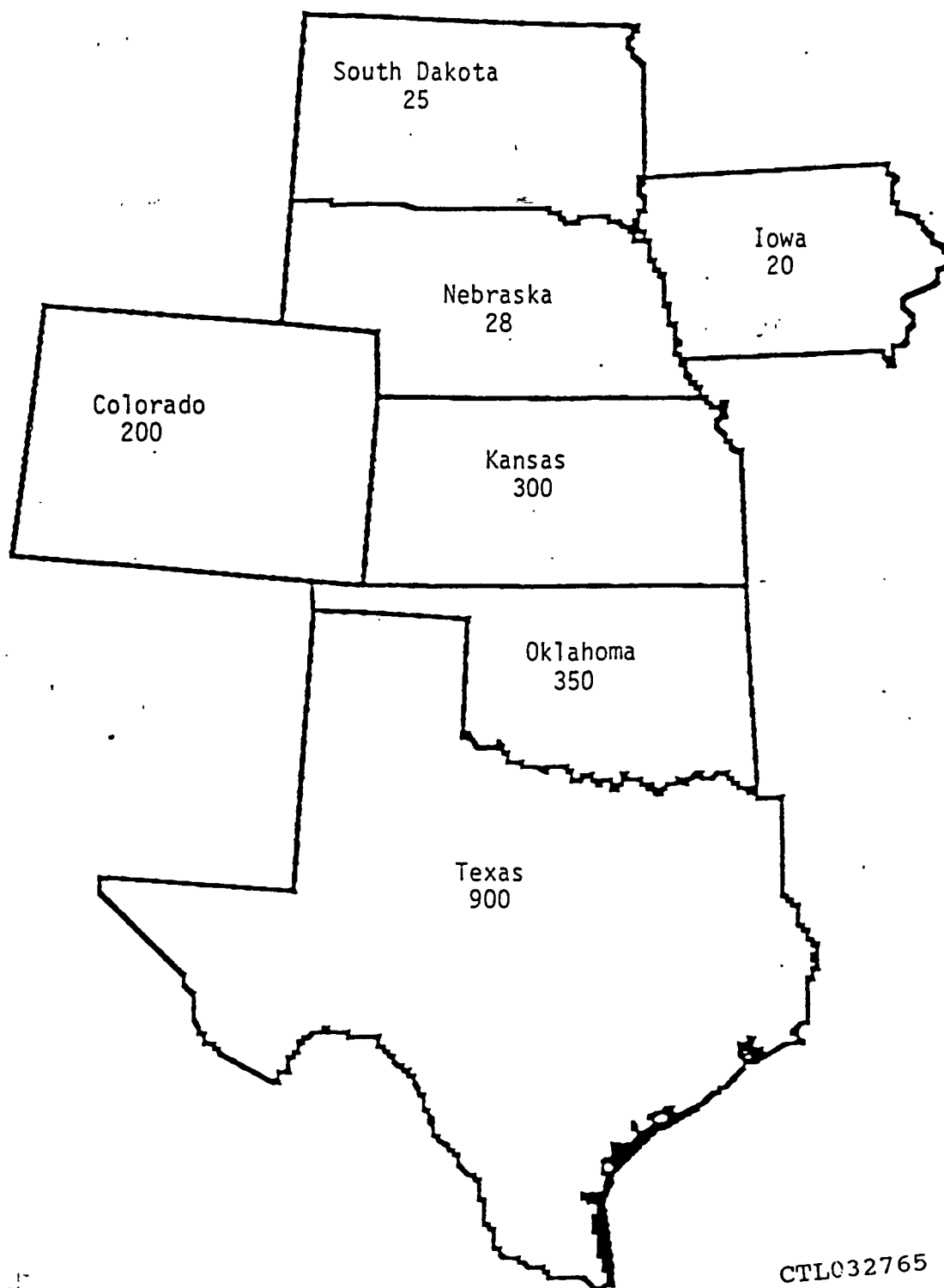
More Personal Comments

I do not see Uni-Bell going into the meeting on the 7th with much in the way of departure from VI's position on the major issues. VI agrees on sampling (probably at Industry's expense), providing a model, and suggesting viable remediation procedures. With this done, VI then intends to tell EPA it's your baby and walk away. This is the one point, on which, Uni-Bell strongly disagrees. Uni-Bell feels if the samples show a problem more serious than anybody now thinks exists, then Uni-Bell doesn't want to walk away.

It is my understanding that your delegation has one hour on the agenda -- I'd bet a dollar to a donut that you are there longer than that.

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TOTAL RURAL WATER DISTRICTS BY STATE



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