



UNI-BELL PVC PIPE ASSOCIATION

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September 27, 1988

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DR. R. T. GOTTESMAN

TO: Uni-Bell Board of Directors
Uni-Bell Associate Members
Uni-Bell International Affiliates

FROM: Robert Walker *RW*

SUBJECT: Uni-Bell Testimony Opposing Lower Vinyl Chloride Limit

I prepared the attached statement in response to California's proposal to lower the drinking water limit for vinyl chloride from 2.0 parts per billion (0.002 mg/l) to 0.5 parts per billion (0.0005 mg/l). Ernie Pronske graciously offered to present our statement in Sacramento, California, on September 28 during the public hearing scheduled for this proposed rulemaking.

We have also enclosed for your information a copy of the Vinyl Institute's excellent draft submittal on the same subject which you will find to be most thorough and very well thought-out.

We propose to keep you informed regarding the outcome of California's latest adventure into innovative regulation.

RPW/vac

cc: Roy Gottesman
Meredith Scheck
Mike Stickel
Arthur Kahn

CTL019807

**STATEMENT OPPOSING PROPOSED
MAXIMUM CONTAMINANT LEVEL FOR
VINYL CHLORIDE IN DRINKING WATER
(R-38-88)**

Prepared for:

**Office of Regulations
Department of Health Services
714 P Street, Room 1000
Sacramento, CA 94234-7320**

Prepared by:

**Uni-Bell PVC Pipe Association
2655 Villa Creek Drive, Suite 155
Dallas, TX 75234**

September 28, 1988

CTL019808

Introduction

My name is Ernest H. Pronske. I am a member of the Board of Directors of the Uni-Bell PVC Pipe Association and I am Vice President of the largest producer of PVC pipe, J-M Manufacturing, with corporate offices and manufacturing facilities in nearby Stockton, California.

The Uni-Bell PVC Pipe Association is comprised of the major producers of polyvinyl chloride (PVC) pipes and related products both domestically and around the world. PVC pipe has become very popular as a proven reliable product for transporting drinking water. Each year over 200,000 miles of PVC water pipe is installed.

The Uni-Bell PVC Pipe Association is pleased to respond to the notice provided in the California Register 88, No. 33 - Z (Pg. 2653) that proposes to lower the maximum contaminant level (MCL) in drinking water for vinyl chloride from 0.002 mg/l to 0.0005 mg/l.

Polyvinyl Chloride (PVC) is produced through the irreversible polymerization of vinyl chloride. PVC, unlike vinyl chloride, has exceptional inertness that has made it highly desirable for a variety of highly sensitive medical and health care applications. PVC is not considered carcinogenic.

In the process of polymerizing vinyl chloride in the manufacture of PVC resin, trace amounts of unreacted vinyl chloride may be entrapped in the PVC. A small fraction of the unreacted vinyl chloride may be extractable from PVC pipes.

In recognition of this potential, and in the interest of maximum safety, the PVC industry rigorously controls the amount of unreacted vinyl chloride in PVC pipe resin. In North America, the residual unreacted vinyl chloride in PVC pipe resins has been monitored by the

National Sanitation Foundation (NSF), as a part of their certification program for plastic pipes.

As a result, PVC pipes manufactured throughout North America have vinyl chloride levels that average well below one part per million which translates into extractant water concentrations that defy detection, i.e., levels calculated to be less than one-tenth of a part per billion (0.0001 mg/l). Furthermore, these extremely low extractant levels of vinyl chloride have been shown to diminish with time. Thus, PVC water pipes would not jeopardize compliance with the proposed 0.0005 mg/l vinyl chloride MCL.

Clearly the vinyl chloride source of concern is not PVC pipe. The regulation of vinyl chloride is based upon the in situ transformation of trichloroethylene and similar solvents in groundwater. Nevertheless, the PVC pipe industry is concerned by California's proposal to deviate substantially from the EPA's vinyl chloride MCL which was established only last year.

Basis for Reconsideration

We are requesting that the Department of Health Services reconsider their proposed 0.0005 mg/l MCL for vinyl chloride. The reasons that warrant such reconsideration are as follows:

- Even good laboratories will experience some variability when conducting tests for substances at very low concentrations. The resultant variability increases as the detection limit is approached. To avoid such problems, the EPA employs a concept they refer to as practical quantitation level (PQL). PQL is basically the lowest concentration that can be reliably measured within specified parameters of precision during routine laboratory conditions.

PQL's are typically five to ten times greater than the so called minimum detection limit. Even so, EPA characterizes the PQL as a relatively stringent target for everyday performance. The EPA's MCL for vinyl chloride is equal to vinyl chloride's PQL of 0.002 mg/l.

The proposed California MCL of 0.0005 mg/l is the minimum detection limit for vinyl chloride and as such is a level which even good laboratories will not be able to consistently measure. Such measurement imprecision could render the 0.0005 mg/l level unenforceable.

California Department of Health Services data indicate that there is only one water system in the entire state that would be affected by the proposed lower vinyl chloride limit. That water system is currently limited to industrial use and, therefore, will not be affected.

In light of this, the justification for regulation at a level below that imposed by the EPA should be questioned. The costs for every community in California to monitor for extreme low levels of vinyl chloride will be excessive and wasteful. Vinyl chloride is not a threat to California's drinking waters.

- The EPA's risk assessment procedures are extremely conservative. EPA employs the most conservative extrapolation models and EPA factors in a number of other safety factors and conservative assumptions.

California should reconsider EPA's established conservative methodology and adopt the EPA's MCL for vinyl chloride. The proposed vinyl chloride level is

unnecessarily restrictive.

Summary Statement of Recommendations

In conclusion, we respectfully urge the California Department of Health Services to reconsider their proposed vinyl chloride MCL. Proper consideration of analytical reliability, California needs and adverse health risks support the adoption of a vinyl chloride MCL consistent with that established by EPA in 1987.

We appreciate this opportunity to comment and thank you for your thoughtful review of our input.