



**A/C Pipe
Producers Association**

1600 Wilson Boulevard,
Suite 1308
Arlington, Virginia 22209
(703) 841-1556



September 10, 1981

Dr. George E. Symons
86 Edgewood Avenue
Larchmont, New York 10538

Dear Dr. Symons:

Enclosed is my ballot on Draft #5 of the proposed AWWA Policy Statement on Asbestos in Drinking Water.

I do not favor including paragraph 5 in the Policy Statement. The recommendation that "(u)tilities should minimize the possibility of asbestos fibers in drinking water", after stating that AWWA "believes there is no demonstrated risk associated with ingestion of asbestos in drinking water," weakens considerably the very foundation of the basic policy statement. Tacitly, it is only numbers away from recommending a MCL for asbestos in drinking water. Water quality goals for non-corrosivity and turbidity already are articulated in AWWA's statement of policy, "Quality Goals for Potable Water," adopted by the Board of Directors on January 28, 1968. Not only is it redundant to restate these general recommendations, it again raises implied concerns not supported by the basic premise of the policy.

I also oppose transmittal of the "Commentary" to Trustees of the Water Quality Division. The facts in paragraphs 1 and 2 of the "Commentary" are well known and represent a small, elementary portion of the body of science reviewed and discussed by the Committee. Quite frankly, I would be amazed if the Trustees were not aware of these very simple facts.



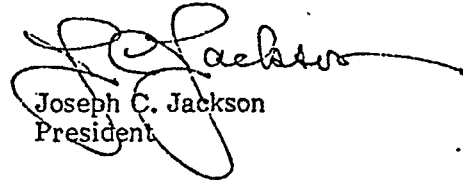
A/C Pipe
Producers Association

Dr. George E. Symons
September 10, 1981
Page 2

Further, in the last paragraph of "Commentary", the phrase "Until it is proven" supports the belief that there is some undetermined risk to ingesting asbestos via drinking water, a view supported further by recommending water utilities "minimize the possibility of asbestos fibers in drinking water." As previously stated, this equivocates the Committee's position that there is no demonstrated risk associated with asbestos fibers in drinking water. For these reasons, I recommend that only the Policy Statement be forwarded to the Trustees.

Respectfully yours,

A/C PIPE PRODUCERS ASSOCIATION



Joseph C. Jackson
President

JCJ/ajb

cc: Ad Hoc Committee Members
A. Kahn, Esq.
N. Rahn, Esq.

SIS/2
Chrono

AWWA Water Quality Division
Ad Hoc Committee on Asbestos in Drinking Water

Draft No. 5

Aug. 12, 1981

AWWA Policy Statement on Asbestos in Drinking Water

A The American Water Works Association believes there is no demonstrated risk associated with the ingestion of asbestos in drinking water.

Approve X Disapprove _____

Reason for disapproval _____

B The American Water Works Association believes that no demonstrated health risk exists related to the ingestion of asbestos in drinking water.

Approve _____ Disapprove X

Reason for disapproval _____

~~(On the basis of this belief, the Association recommends that:~~
(In accordance with this policy, the Association recommends that:
(Strike out one)

1. The Association keep its members fully informed on the subject of asbestos in drinking water.

Approve X Disapprove _____

Reason for disapproval _____

2. Water utilities (should) share this information with their customers and with local health authorities, when appropriate to the local situation.

Approve with word "should" added _____

Approve without the word "should" added X

Disapprove both statements _____

Reason for disapproval _____

- A | 3. Every water utility should be prepared to respond promptly, to the extent of its knowledge, to public inquiries made about asbestos in the local drinking water supply.

Approve X Disapprove _____

Reason for disapproval _____

- B | 3. Every water utility should be prepared to respond promptly to the extent of its knowledge, to public inquiries about the number of asbestos fibers in the local drinking water supply.

Approve _____ Disapprove X

Reason for disapproval _____

- A | 4. Utilities which use asbestos-cement pipe in the water system should follow established and approved AWWA procedures for handling, cutting, machining, and tapping pipe.

Approve X Disapprove _____

Reason for disapproval _____

- B | 4. Utilities which use asbestos-containing materials should follow established and approved AWWA procedures, particularly with respect to handling, cutting, machining, and tapping asbestos-cement pipe.

Approve _____ Disapprove X

Reason for disapproval _____

h
e
w

5. Utilities should minimize the possibility of asbestos fibers in drinking water by striving to meet the Association's water quality goals regarding noncorrosivity and turbidity and its policy on the treatment of public water supplies.

Approve _____ Disapprove X

Reason for disapproval Weakens basic policy statement.

 Redundant; articulated in AMMA statement of policy "Quality Goals for Potable Water."

A

6. Unless a definite causal relationship between asbestos in drinking water and adverse health effects is established, restraint should be exercised in the promulgation, adoption, and enforcement of standards and regulations with respect to asbestos in drinking water.

Approve _____ Disapprove X

Reason for disapproval _____

B

6. Unless a definite causal relationship between asbestos in drinking water and adverse health effects is demonstrated, standards and regulations with respect to asbestos in drinking water should not be promulgated.

Approve X Disapprove _____

Reason for disapproval _____

C

6. Restraint should be exercised in the promulgation, adoption, and enforcement of standards and regulations with respect to asbestos in drinking water.

Approve _____ Disapprove X

Reason for disapproval _____

Approve X Disapprove

Reason for disapproval _____

COMMENTARY

Asbestos may enter water supplies from naturally occurring geological formations in the earth's crust or as the result of man caused activities. Asbestos may also leach into drinking water if the water is specifically corrosive toward these materials.

- o Treatment of raw water by an appropriate filtration process significantly reduces the number of asbestos fibers in water.

Treatment of the water to reduce in corrosive characteristics toward asbestos-containing materials will reduce the likelihood of asbestos being leached from asbestos-cement materials in contact with water. Surface treatment of asbestos-containing materials to be in contact with water, before use or after cleaning, will reduce the leaching effect of corrosive waters on the material.

- o Until it is proven that the ingestion of drinking water containing asbestos fibers, over some period of time, does involve a potential health risk, it appears prudent for water utilities to minimize the possibility of asbestos fibers in drinking water whenever appropriate and reasonable.

8. Do you approve the previous commentary to be transmitted with the final approved policy statement?

Approve _____ Disapprove X

Reason for disapproval Superficial and equivocates

Committee's conclusion that there is no demonstrated

risk associated with the ingestion of asbestos in drinking

water.