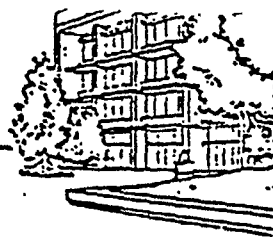


CITY OF FAIRFIELD

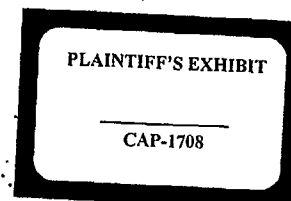
1000 WEBSTER STREET
FAIRFIELD, CA. 94533
(707) 426-5500

Incorporated December 12, 1903



October 10, 1984

William D. Ruckelshaus
Administrator
Environmental Protection Agency
401 M. Street, S.W.
Washington, D.C. 20460



Dear Mr. Ruckelshaus:

The City of Fairfield is very concerned about EPA's announced plan to ban asbestos-cement pipe. The City of Fairfield has used asbestos-cement water pipe to serve its 44,000 customers for more than thirty years. Asbestos-cement pipe has proven a cost-effective means of conveying potable water. Numerous scientific and regulatory bodies around the world, including EPA, have consistently indicated that asbestos-cement pipe poses no risks of any consequence to our customers. We therefore continue to use asbestos-cement pipe today and hope to continue its use for many years.

Were EPA to ban asbestos-cement pipe, the City of Fairfield would face substantial additional costs. Moreover, we are very concerned that such EPA action would create intense public pressures to remove existing asbestos-cement pipe. Were such demands ever heeded, the costs would be staggering. We therefore urge EPA to reconsider its plans. In order to assist the Agency in understanding the asbestos-cement pipe issue, the remainder of this letter provides some information on why the City of Fairfield employs this valuable product.

The City of Fairfield first began using asbestos-cement pipe in 1952. It was found that asbestos-cement pipe was easier to install, was not susceptible to corrosion, and was very competitive in bid prices. Over the years, asbestos-cement pipe has been demonstrated to have a lifetime of over fifty years with minimal maintenance costs. As our service area has grown, we have continued to install new asbestos-cement pipe. Today 90 percent of our water system is currently serviced by asbestos-cement pipe. Asbestos-cement pipe is the only approved water main material for use within the City of Fairfield distribution system in sizes 6-inch thru 24-inch diameter. Presently, we have approximately 160 miles of asbestos-cement pipe in our system.

In selecting pipe materials, we are concerned with both initial installation costs and long-term maintenance costs, and with the safety of the material. In each respect, our experience has led us to choose asbestos-cement pipe.

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The costs of purchasing and installing asbestos-cement pipe have been consistently lower than alternative materials. In specifying new pipes, we need to be cognizant not only of installed costs today, but also of long-term costs before any major new pipe project is undertaken.

Before switching to asbestos-cement pipe, approximately thirty years ago, the City of Fairfield used cast iron pipe. Because of our corrosive soil, there have been increased failures in the cast iron pipe. Although cast iron pipe has been replaced with asbestos-cement pipe for the past ten years, there still remains 77,000 lineal feet of cast iron pipe in our distribution system. Due to the increased failures of cast iron pipe, the City of Fairfield has committed to the replacement of the 77,000 lineal feet with asbestos-cement pipe over the next 10 year period. By using asbestos-cement pipe in our corrosive soil, there is no need to use cathodic protection systems to minimize the pipe failures. Asbestos-cement pipe has been in the ground as long as some of the cast iron pipe that has failed, but no problems have been experienced with the asbestos-cement pipe.

Finally, we are always vigilant about the safety of the water conveyed in our system. Needless to say, with the great publicity that asbestos health effects have had in the past decade, we have been concerned about the possibility that some health risk might be posed by fibers from asbestos-cement water pipes. We have thus followed closely the reviews conducted by the American Water Works Association and EPA of asbestos ingestion risks.

We were reassured when the AWWA conducted an independent review of the medical and technological evidence on asbestos-cement pipes in 1974 and concluded that, "the probability of risk of health from the use of such (asbestos-cement) systems is small -- approaching zero." We nonetheless welcomed the extensive research program on asbestos in water conducted by EPA in cooperation with the National Toxicology Program over the past decade. The results of that program, as announced at EPA's 1982 Workshop on Ingested Asbestos, confirmed the earlier AWWA assessment and once again reassured us that asbestos-cement pipe could safely be used in our system. Several EPA scientists and officials from its Office of Safe Drinking Water participated in that workshop and unanimously concluded that the extensive research program failed to find any human or animal evidence of a risk from ingested asbestos.

The City of Fairfield has, nonetheless, been monitoring its water system to determine asbestos levels. The average asbestos level in the treated water is 3.2 MFL, but the raw water level is 8.8 MFL. Our total raw water supply comes from surface water through Lake Berryessa (Putah Creek Basin). In March, 1984, the AWWA Journal contained an article entitled "Field Monitoring of Chrysotile Asbestos in California Waters" in which the raw water level of asbestos in Lake Berryessa was sampled to be as high as 28,000 MFL. From this data, I conclude that the asbestos contained in our treated water mains is primarily from natural sources as contained in the surface water source of Lake Berryessa.

In sum, we have found asbestos-cement pipe to be effective, affordable and safe. We thus plan to continue its use for many years. Were we to be denied use of asbestos-cement pipe, our expenditures for new installed pipe would increase substantially. For example, the initial cost of ductile iron pipe is more and the installation cost is greater, also. When our corrosive soil is considered, the extra costs of pipe bonding, grounding, cathodic protection test stations, rectifiers, anodes, etc., are very substantial.

Maintenance costs would also increase over the years. The cathodic protection systems have to be tested, monitored, and the power costs to run the systems are an ongoing bill.

Perhaps more importantly, we would expect an EPA ban to cause public demands to remove asbestos-cement pipe already installed. It would be extremely difficult for us to explain to our customers our confidence that the materials we use to convey water are safe when the same materials have been banned by EPA.

We understand that any EPA ban would be premised on alleged risks to workers from inhaling asbestos when manufacturing and installing pipe rather than from ingestion risks, but that will likely be a distinction without a difference to the public. Should such public pressure occur and should we be forced to begin removing and replacing asbestos-cement pipe, our ability to provide potable water at a reasonable price would be seriously jeopardized. The cost to replace all asbestos-cement pipe in our water system would be in excess of \$35 million.

We trust that EPA's mind has not been set in concrete on the asbestos-cement pipe issue and urge you to reconsider any plans to ban this valuable product. If we can provide further information that would be helpful in your deliberations, please let us know.

Very truly yours,



CHARLES J. BECK, P.E.
Assistant Public Works
Director/Operations

cc: Assistant Administrator
John Moore

Office of Toxic Substances
Director Don R. Clay

Chemical Control Division
Deputy Director David Dull

Office of Drinking Water
Director Victor J. Kimm

bcc: A/C Pipe Producers Association
Bert Brown CertainTeed