

FROM: Lewis & Gilman, Inc.
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FOR: A/C Pipe Producers
Association

For Client Approval

ACPPA AND AIA/NA OPPOSE EPA
AMBIENT WATER QUALITY CRITERIA
FOR ASBESTOS

The A/C Pipe Producers Association (ACPPA) and the Asbestos Information Association/North America (AIA/NA) have stated that water quality criteria should not be used as guidance in promulgating drinking water standards. The Associations maintain that the criteria, published in late 1980, do not accurately reflect either the latest or the best scientific knowledge on the subject. The Associations maintain that the conclusions of the EPA document were drawn almost exclusively from inhalation studies, despite the fact that a substantial amount of ingestion research was available, including scientific findings specific to asbestos in drinking water.

The Agency was compelled under a consent decree with the Natural Resources Defense Counsel, to issue criteria for sixty-five toxic pollutants including asbestos. Water quality criteria are not rules and have no regulatory effect. They are estimates of the concentration of a contaminant which may exist and still not impose undue risks to humans who drink water without further treatment or eat fish or shellfish from the water. Health-based water quality criteria will not necessarily be the same as standards or guidelines issued under the Safe Drinking

Water Act.

When the criteria were proposed in 1979, ACPPA and AIA/NA submitted an 80 page analysis which asserted that EPA ignored the ingestion evidence and used selected inhalation results to calculate "totally inadequate" risk assessments. The response urged EPA to rewrite the asbestos water quality criteria document and republish its risk assessment since the current criteria fell far short of meeting statutory requirements.

Omitted from the EPA Water Quality Criteria, according to ACPPA/AIA, were findings of epidemiology studies which failed to establish any cause-and-effect relationship between ingested asbestos and gastrointestinal (GI) cancer. Among those excluded in the EPA criteria were studies conducted in Quebec and in the Puget Sound region of Washington, where waters are high in naturally-occurring asbestos. Both studies failed to show any causal link between fibers in drinking water and cancer.

Also cited in the response was an extensive study conducted in Connecticut by the EPA which showed no correlation between the incidence of GI cancer and the use of asbestos-cement water pipe in Connecticut water supply systems.

In addition, the Associations discussed studies conducted in Duluth and Minneapolis-St. Paul, Minnesota, and several animal ingestion studies all which showed no increased risk of cancer from ingested asbestos.

When the final criteria were published in the Federal Register on November 28, 1980, EPA issued no modifications to recommended ambient water concentrations for asbestos (Optional: The Associations are considering legal action against the Agency).

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OP ED ARTICLE -- A BENEFICIAL PRODUCT UNFAIRLY MALIGNED

The public's right to assess the continued safe use of our nation's products can not be denied. However, one might ask: Is consumer activism preempting the reasoned and carefully deliberate judgment of the scientific community? Wouldn't the public be better served to leave such evaluation in the hands of scientists and medical specialists charged with protecting the public welfare?

A case in point is asbestos-cement (A/C) pipe. Scientists have agreed that inhalation of excessive amounts of asbestos can cause or contribute to disease. Yet many of these same scientists using the same standard measurements of cause and effect relationships, such as epidemiology (the study of distribution and dynamics of disease in human populations) and laboratory animal studies, have repeatedly noted the lack of any evidence establishing a clear causal relationship between ingestion of asbestos and disease.

In a study published in the Journal of Environmental Health (Jan./Feb. 1980), Dr. J. Wister Meigs, Clinical Professor of Epidemiology, Yale University School of Medicine, concluded:

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"These analyses give no consistent indication that use of A/C pipe in Connecticut public water supplies has been followed by increases in incidence either of 'all cancers' or of the individual sites considered . . . Therefore, the lack of coherent evidence of cancer risks from use of A/C pipe is reassuring."

Findings of the Meigs report are consistent with those reached in a long list of scientific papers, laboratory studies, and research conducted by the U.S. National Institute of Health Sciences, the Environmental Protection Agency, Health and Welfare in Canada, universities, and independent scientists.

In spite of this overwhelming evidence in support of A/C pipe and its safety, consumer emotionalism has brought about an indictment of the entire category of products which use asbestos as a result of an unrelated issue.

This continuing debate by the public has not gone unnoticed by the A/C Pipe Producers Association (ACPPA). The industry has worked closely with government, scientists, and the public in the continuing examination of A/C pipe in its initial installation, throughout its operation, and after decades of efficient use.

In 1974, the Association and the American Water Works Association (AWWA) Research Foundation commissioned a panel of government and independent authorities in pathology, epidemiology, analytical methods, and public health to study the potential relationship

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between disease and the ingestion of water transported through A/C pipe. The report concluded: "No firm evidence shows that the proper use of asbestos-cement pipe posed a hazard to health . . . (and) . . . the probability of risk to health from the use of such systems is small -- approaching zero."

In addition, the U.S. National Institute of Environmental Health Sciences (NIEHS) has been conducting extensive animal feeding studies in which test animals were fed asbestos in food or drinking water. In a January 1981 report it concluded, "it appears that longevity was not affected by exposure to the various types of fibers . . . (and) . . . no carcinogenic effect was observed."

Putting it in human terms, assuming the highest fiber levels naturally occurring in drinking water, a human would have to drink nearly four million quarts of water a day to consume a quantity of asbestos equal to the percentage that failed to cause cancer in mice.

Studies conducted in areas where asbestos occurs naturally in water, such as Duluth, Minnesota, the Puget Sound Region in Washington, and Quebec, all show no increased risk in cancer from asbestos ingested in drinking water.

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Asbestos is a naturally-occurring mineral in many parts of the world. A/C pipe is made of about 80-85 per cent cement and 15-20 per cent asbestos fibers. The fibers are not free, but locked in the cement binder, and serve as tiny reinforcing rods to give the pipe strength necessary to serve for decades without leaks or breaks.

In spite of continuing scientific evidence in support of A/C pipe, and because of its name, and one of its components, some have concluded that A/C pipe is "guilty by association." The scientific community, a final arbiter on issues of public health must not lose ground to speculation and emotionalism. That would certainly be a disservice to the public.

A/C Pipe Producers Association will continue to be responsive to the concerns of the public by supporting the scientific community in its reasoned approach to our nation's health and welfare.

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