



A/C Pipe
Producers Association

Internal Correspondence

TO: Public Affairs Committee
International Affairs Committee

FROM: J. F. Welch, Director, Public Affairs

DATE: January 12, 1981

SUBJECT: Connecticut Department of Health Services -- Proposed Regulations for Water Systems Using A/C Pipe

REF: (1) JFW correspondence, same title, August 21, 1980.
(2) JFW correspondence, same title, October 2, 1980.
(3) JFW correspondence, same title, October 10, 1980.

ACTION REQUIRED: *Review for information*



The Connecticut Department of Health Services (DHS) has released to AACPP special counsel a draft of the proposed amendments to Section 19-13-B102 of the General Statutes, "Standards for Quality of Public Drinking Water." It should be emphasized that this is a draft document subject to change. To facilitate comparison with the original (July 29, 1980) proposal, changes or new sections are underlined in the draft. A copy of the original proposal also is enclosed.

The changes are rather significant. The pH increase "triggering level" for the initiation of treatment would be changed from 0.3 to 0.6. Further, and consistent with testimony presented by James Millette of EPA, DHS would require examination of pipe specimens. Where corrosion is "evident" (corrosion criteria unspecified), asbestos fiber counts would have to be taken. If statistically significant levels of asbestos were present, water treatment and public notification procedures would have to be instituted.

Also enclosed is a clipping from the Hartford Courant, which describes the reaction of the Connecticut Fund for the Environment to the amended proposal. The reporter refers to a "major change" requiring tearing up of sections of A/C pipe if acidity increases to a specific level. There is no mention of such a provision in the December 10, 1980 draft. It is possible that the reporter, who is not known for accuracy, has misread and misrepresented the proposal.

The final proposal will be forwarded as soon as it is released. If you have any questions in the interim, please do not hesitate to call.

JFW/ajb
Enclosures

cc: A. Rahn, Esq.
H. Rahn, Esq.
H. Battle (L&G)

copies to: Public Affairs Committee
International Affairs Committee

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Chrono

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DRAFT

PROPOSED ADDITION TO SECTION 19-13-B102 OF THE CONNECTICUT PUBLIC HEALTH CODE

(c) Asbestos-Cement Pipe: In any water system where asbestos-cement pipe is used, monthly measurement shall be made for pH value of the water at the point of entry into the asbestos-cement pipe distribution system from each separate water source and at two subsequent points in the distribution system for each source. All sampling points are subject to the approval of the Commissioner of Health Services.

Wherever the 3 month average of pH value is found to increase by more than 0.6 in passing through a system, pipe specimens shall be taken at representative points in the system as approved by the Department of Health Services.

If these specimens indicate that corrosion is occurring, a sample of water shall be taken near the end of the distribution system and examined for the presence of asbestos fibers. Where pipe corrosion is evident and where statistically significant numbers* of asbestos fibers are found present, water treatment shall be instituted or so altered as to eliminate the release of fibers. Where such treatment is used, tests for pH value shall be made and recorded at the treatment plant at least daily in addition to the testing schedule listed above.

All tapings or cuttings of asbestos - cement pipe shall be made with equipment that flushes the pipe cuttings to waste and does not allow their passage into the drinking water lines.

Whenever a statistically significant number* of asbestos fibers is found present in finished drinking water all consumers that may receive the water shall be notified of the test results and of the control measures being instituted.

*As determined by the procedures given in "Interim Method for Asbestos in Water",

ADMINISTRATIVE REGULATIONS

DEPARTMENT OF HEALTH SERVICES

In accordance with the provisions of Section 4-168(a) of the Connecticut General Statutes, as amended, notice is hereby given that the Department of Health Services proposes to amend regulations concerning "Standards for Quality of Public Drinking Water" under authority of Section 19-13 of the General Statutes, as amended, as follows:

Amend Section 19-13-B102 by adding subsection (t) as follows:

Asbestos-Cement Pipe: In any water system where asbestos-cement pipe is used, measurement shall be made for pH value of the water at the point of entry into the distribution system and at subsequent points in the system approved by the Commissioner of Health Services at a frequency of at least one test per month per mile of asbestos-cement pipe, with a minimum of one per month.

Wherever the monthly average of pH value is found to increase by more than 0.3 pH unit in passing through the system, water treatment shall be instituted to correct it. Where such treatment is used, tests for pH value shall be made and recorded at the treatment plant at least daily in addition to the testing schedule listed above.

Statement of Purpose: To safeguard public water supplies from the possible release of asbestos fibers into the drinking water caused by the deterioration of asbestos-cement pipe.

A public hearing will be held to consider the above-mentioned regulation on:

Tuesday, September 16, 1980 at 10 a.m.
Appropriations Room, Third Floor, Room 310
State Capitol, Hartford.

All interested persons are invited to submit oral or written data, views and arguments in connection with the above stated regulation within twenty days following publication of notice. These may be submitted to:

Richard S. Woodhull, Chief
Water Supplies Section
Preventable Diseases Division
Connecticut Department of Health Services
79 Elm Street
Hartford, Connecticut 06115

DEPARTMENT OF HEALTH SERVICES

by
Douglas S. Lloyd, M.D.
Douglas S. Lloyd, M.D.
Commissioner

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