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5456

3/10/81

DRAFT CRITIQUE

I have reviewed the working document of the PPFA Toxicology Task Force and have listed my comments below.

Tone and Clarity

After reading the draft, it appears that PPFA has decided to take a very candid approach in dealing with the Adams and Reid reports. I would like to make a plea for moderation. I feel that continuation of this tone can lead one away from the real issues and, in fact, may be doing exactly what the union wishes us to do. This document could be toned down by substituting appropriate words and phrases for terms like "insinuation", "red herring issue", "apparently felt no obligation". Furthermore, I feel the term "red herring" is overused and detracts from the clarity of the presentation.

Specific Comments

1. Page 5, first line. Styrene is not recognized as either an animal or human carcinogen.
2. Page 6, line 11, carryover to page 7. ". . . water use. The fact is that nitrosamines are not used. The ironic part is that this may be more of a metal pipe concern since Fan, et al^a has reported that the level of nitrosodiethanolamine in eight brands of cutting oils ranged from 0.02% (200 ppm) to 2.99% (29,900 ppm)."

"We have presented these examples because they clearly demonstrate the kinds of misinterpretation and misrepresentation rife in the Reid report. These examples of technical misinformation cited above are the more substantial ones but not the only ones found in the Reid report¹. We think it is important to correct the record regarding these matters."

^aFan, et al, Science, 196, 70-71, 1977.

(NOTE TO AUTHOR: We should find out if plumbers actually use cutting oils. Also, N-nitrosodiphenylamine has been found to cause cancer in animals.)

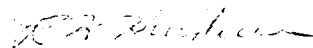
3. Page 7a. This is difficult to read. It might be better presented in a numbered series stating the "contention", then the "fact".
4. Page 8. Change sentence in lines 5 and 6 from bottom ("Development of. . . in death.") to read, "The fact is that the conservative methods of risk assessment used by EPA combined with high dose levels used in testing indicate that the present EPA estimates probably overestimate the actual risk."

5. Page 4, lines 4-11, should be changed to read, ". . . unacceptable public health hazard (e.g. Freshly constructed metal pipe can contain turbid oily and malodorous water, and excessive quantities of heavy metals such as lead. Second, the Reid report completely ignores evidence such as the absence of any health effects associated with plastic pipe after 25 years of nationwide experience."
6. Page 16. In lines 3 and 4, delete the phrase "it is legitimate to ask whether". Change line 6 to read, ". . . surface exposure is insignificant by comparison." Delete lines 7-11; this is redundant.
7. Page 16, lines 12-15, should read, "Second, the Reid report ignores the enormous dilution effect that sources of wastewater and receiving water will have on any trace contaminants for plastic pipe. Furthermore, it fails to recognize that such dilution is an important. . .".
8. Page 16, last paragraph. This should be omitted because it is highly speculative and also falls under my previously addressed concern about tone.
9. Page 17, lines 5 and 6, should read, ". . . that the parties raising such issues should have adequate scientific and technical data." (Do we really want "regulatory bases" included?)
10. Page 19, first paragraph. I suggest you use "connotation" in place of "insinuation". Also, it is not "pretty clear" what the author believes the connotation is. He should spell it out.
11. Page 19, second sentence. This should be omitted; it does not really add anything.
12. Page 19, line 8. Substitute "incomplete" for "half-baked".
13. Page 19, line 13. Substitute "failed" for "apparently felt no obligation".
14. Page 19, line 17. Change this to read, "This chapter provides 38 pages (which includes the Appendix B noted above) of (1) lengthy discourse on general toxicity . . . and (2) raises nebulous speculations. . .".
15. The paragraph ending on page 19 and continuing on page 20 is excellent.
16. Page 21, fifth line from bottom. Consider substituting "contentions" for "desperation ploy".
17. Last paragraph on page 21. This should be developed more. We should consider what criteria the Housing Commission must use in order to decide whether an environmental impact report is required.
18. Page 22, last 12 lines should read as follows: "Second, the Reid report fails to recognize that any levels from the Montgomery study only address short-term risk during the early, worst case period of total pipe life. Long-term risk is dependent upon the leaching that occurs over a lifetime. The finite nature of residual materials in plastic pipe and the decreased leaching observed with time (Montgomery and Metzger reports) indicate that the long-term risk is low. Finally, the Reid report proposed criteria infers that there is a basis for a zero-exposure requirement criterion for plastic pipe."

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The Task Force might consider going through the Reid and Adams report and sanitizing all the information which is not supported by fact/hard data. This might be an interesting way of showing the Housing Commission how much real information has been provided by these two reports.



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COMMENTS ON CRITIQUE OF REID REPORT

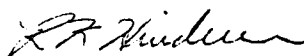
My comments are as follows:

1. Page 9, line 5. The last word should be spelled: nitrosamines.
2. Page 10, last paragraph, page S-2. This needs to be expanded. The term "conservative levels" suggests that they are much greater in the real world. The fact is that there is no data available that indicates they are underestimates. In fact, the Metzger data and the use of non-chloroform/carbontetrachloride-requiring processes suggest the levels in the Montgomery report may be overestimates.

NOTE: It should be noted that EPA has never publicly taken a position that any risk level (i.e., 1 in 1 million) is acceptable. However, I am not sure that it serves any purpose to challenge this.

The Reid report statement that these "levels of carcinogens...in the Montgomery study are...greater than the EPA 'acceptable risk levels' is an inappropriate comparison (i.e., apples vs. oranges). The levels in the Montgomery study, when considered individually, are only indicators of short-term risk. These data must be taken as a whole and looked at relative to time in order to address chronic (lifetime) risk. Although the Montgomery data does not permit a determination of risk, it does indicate that any risk decreases with time. This is in agreement with the finite nature of residual chemicals and the Metzger data.

3. Page 14, line 13. We should avoid the terms "safe" and "threshold". The former term can mean absolute safety. In the case of carcinogens, many people believe that safety equals zero exposure. The second term is a matter of belief rather than fact. Its use often drives usually moderate individuals to more conservative positions. I suggest that "acceptable levels" be used instead of "a safety threshold".



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