



A/C Pipe
Producers Association

1600 Wilson Boulevard
Suite 1008
Arlington, Virginia 22209
(703) 941-1556

March 14, 1984

Mr. Paul Schulte
Deputy Executive Director
American Water Works Association
6666 West Quincy Avenue
Denver, CO 80235

Dear Paul:

Thanks for the opportunity to discuss the status of AWWA's proposed policy statement on asbestos in drinking water.

As requested, I have enclosed a copy of Comments of the Association of Asbestos Cement Pipe Producers on EPA's Advance Notice of Proposed Rulemaking on National Revised Primary Drinking Water Regulations. Pages 44-46 address the National Academy of Sciences' (NAS) risk assessment, based on workplace studies, of asbestos in drinking water. We trust that AWWA will use the same yardstick to evaluate the NAS calculations as it used in developing the association's position in the TTHM litigation. The evidence supporting the absence of adverse health effects from ingested asbestos is strong, consistent and certainly much more comprehensive than that on the potential health effects of chloroform and other THM's. So in reviewing the NAS risk assessment, it will be important that AWWA take into consideration all the other epidemiologic and animal feeding studies showing no adverse health effects from asbestos in drinking water. We suspect that the NAS calculations was given such little credence (EPA did not even mention it in the Advance Notice of Proposed Rulemaking nor did Joe Cotruvo even acknowledge its existence, six months after publication, in his concluding remarks, attached, at EPA's Summary Workshop on Ingested Asbestos) is because it takes such a narrow and theoretical view of the scientific/medical evidence.

Also enclosed is the abstract from "STR-1: Asbestos Fibres in Drinking Water." This review was authored by Dr. Brian Commins, formerly with the Water Research Centre. Since there is a copyright on this document and since Commins derives income from its sale, I must ask you to procure a complete copy from the author. AWWA should have a copy or two in its library anyway, along with the Summary Workshop proceedings (Environmental Health Perspectives, Vol. 53, November, 1983). Paul, we appreciate the difficulty in developing a policy statement on a matter as controversial as asbestos in drinking water. To its credit, AWWA took every conceivable precaution to assure objectivity and full and open participation by all water works interests — utility managers, consulting engineers, state and federal public health officials and pipe manufacturers. The proposed policy statement is the culmination of years of work. Two dissenting comments should not be permitted to unravel these good efforts particularly when opportunity was afforded to participate in the committee's deliberations. To do so would accord veto powers to these parties.



A/C Pipe
Producers Association

Mr. Paul Schulte
March 14, 1984
Page 2

Finally, one observation: if AWWA cannot draw firm conclusions on a complete body of scientific evidence such as exists for asbestos in drinking water, and one which touches so many of its members, there is little hope that this same policy-making process can cope with the more complex and less researched issues that face water utilities in the future.

Thanks again for your cooperation. If we can be of further assistance, please do not hesitate to call.

Very truly yours,

A/C PIPE PRODUCERS ASSOCIATION

John F. Welch
John F. Welch
Vice President
ajb

JFW/ajb

Enclosures

cc: A. Kahn, Esq.
Timothy S. Hardy, Esq.

0182031405
Chrono

CAPCO JEN 0004327