

PLAINTIFF'S EXHIBIT

CAP-1763

Internal Correspondence



W. H. Little
H. R. Barclay
A/C Pipe
Producers Association
Board of Directors
International Affairs Committee
TO
FROM
J. F. Welch
J. F. Welch, Vice President

DATE March 14, 1984

SUBJECT American Water Works Association (AWWA) - Policy Statement on Asbestos in Drinking Water

ACTION REQUIRED: Review for information

Current Status

On February 27, 1984, Staff met with Paul Schulte, Deputy Executive Director, AWWA, to discuss status of the proposed policy statement. The deadline for comments was January 15, 1984. Schulte gave the impression that there were not a large number of endorsements (AACPP did submit an endorsement), which may be normal for such policy-making actions. There were two dissenting opinions; one from a distributor, Waterworks Sales Company, and another from the Ductile Iron Pipe Research Association (DIPRA).

The distributor's contentions were characterized as more cogent than DIPRA's and focus on concerns that the policy statement "is an AWWA endorsement and approval of a product by inference." DIPRA's letter was not offered for our review but it is obvious that their opposition is based on similar grounds. DIPRA also submitted to AWWA the National Academy of Sciences' risk assessment of asbestos in drinking water (see JFW correspondence, National Academy of Sciences (NAS) - Report of Committee on Safe Drinking Water, April 30, 1983). Schulte previously was unaware of the NAS report, which attempts to quantify asbestos ingestion risks on the basis of occupational cohort inhalation studies. That the NAS calculations, however theoretically derived, purport to show that drinking water containing 110,000 f./l. may lead to one additional GI tract cancer per 100,000 men seemed to impress Schulte.

Staff rebutted the NAS calculations using evidence submitted at EPA's Summary Workshop on Ingested Asbestos, AACPP's Comments to EPA's Advance Notice of Proposed Rulemaking on National Revised Drinking Water Regulations, and Commin's recent review. These references were later forwarded to Schulte (see enclosure).

Given the dissenting opinions, a final policy statement is not expected before January, 1985 at the earliest. If you have any questions, please do not hesitate to call.

JFW/ajb

Enclosures

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

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