



A/C Pipe
Producers Association

~~W-1216~~
~~W-1216~~
Internal Correspondence

TO Board of Directors
International Affairs Committee
J.F. Welch
FROM J.F. Welch, Vice President

DATE August 17, 1984

SUBJECT

SOP-01-061 (OSHA-EPA Rulemakings) - Municipal Intervention Tactic

REF: (1) JFW correspondence, same title, August 7, 1984
(2) JFW correspondence, same title, July 6, 1984

ACTION REQUIRED: Review for information

Current Status

Enclosed is a letter from the California Water Service Company to the U.S. Environmental Protection Agency (EPA) Administrator opposing the Agency's consideration of an A/C pipe ban. Congratulations are in order for John Himmelberger (CertainTeed Corp.).

Member companies should continue their effort to have additional letters sent to EPA. If Staff can be of any assistance, please do not hesitate to call.

JFW/lk

cc: A.J. Kahn, Esq.
Timothy S. Hardy, Esq. w/out encl.

copies to:

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CALIFORNIA WATER SERVICE COMPANY

1720 NORTH FIRST STREET • P. O. BOX 1150 • SAN JOSE, CA 95108 • (408) 298-1414

August 3, 1984

Mr. William D. Ruckelshaus
Administrator
Environmental Protection Agency
401 M Street, S. W.
Washington, D. C. 20460

Dear Mr. Ruckelshaus:

The California Water Service Company is concerned about the Environmental Protection Agency's announced plans to ban asbestos-cement pipe. California Water Service Company is an investor-owned water utility providing service to some 35 cities throughout the State of California with a total of 322,000 service connections and a water system with over 22,000,000 feet of mains. This system includes over 13,000,000 feet of installed asbestos-cement pipe. The decision to use asbestos-cement pipe, which began in the 1930's, has been carefully made in view of the corrosive characteristics of the areas in which our water systems are installed.

The undersigned writer is currently Chairman of the Engineering and Construction Division of the American Water Works Association and also Chairman of its Committee on The Use of Asbestos in Water Utility Construction. In connection with these activities, I recently testified on July 10 at the rule making proceedings of the Occupational Safety and Health Administration in Washington. My testimony was given on the conviction that the use of A/C pipe in the construction of water distribution systems in our area is in the best interest of our customers from the water quality, safety and health and economic reasons.

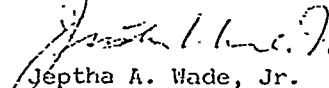
As you know, asbestos fibers are one of the most inert materials in common use. There has been no demonstrated health risk from exposure to asbestos properly bound into the cement matrix. The only identified health risks associated with asbestos has been with respirable fibers. The thrust of our testimony at OSHA was to the effect that asbestos cement pipe represents no health risk to our customers nor to the construction forces installing the pipe in the field. Voluminous testimony has been presented establishing that manufacturers easily comply with OSHA's tolerance limits in the manufacture of asbestos pipe. We, therefore, conclude that it would not be in the public interest to ban the manufacture or use of asbestos pipe for drinking water distribution systems.

We are not attracted to the alternative materials available for the construction of water distribution systems as we believe that soil conditions in our area are severely destructive to ductile iron and steel pipes and are not satisfied that plastic pipe has a sufficiently demonstrated track record to make it a completely satisfactory substitution either from a cost or health point of view.

We believe that the manufacture of asbestos pipe is properly controlled and that the installation and use of this material presents no health hazard to the nation and that EPA would be doing a disservice in proposing a ban on its use.

Very truly yours,

CALIFORNIA WATER SERVICE COMPANY


Jephtha A. Wade, Jr.

Vice President and Chief Engineer

CAPCO JEN 0032661



CAPCO JEN 0032662



A/C Pipe
Producers Association

A/C Pipe Producers Association																	
CATEGORY	DOMESTIC SHIPMENTS - NON-PRESSURE SEWER PIPE - THOUSANDS OF FEET																
	NOMINAL PIPE DIAMETER - INCHES																
	REGION TOTAL																
PIPE DIAMETER	4	5	6	8	10	12	14	15	16	18	20	21	24				
NE			4	7		1				1				13			
MA	2		1	31	1	1				3				39			
ENC																	
WNC																	
SA				25		1								26			
ESC																	
WSC																	
MTN													1	1			
PAC																	
DIA TOTAL	2		5	63	1	3				4			1	79			
NE																	
MA																	
ENC																	
WNC																	
SA																	
ESC																	
WSC																	
MTN																	
PAC																	
DIA TOTAL																	
NE			3	2			1							6			
MA			1	3										4			
ENC																	
WNC																	
SA							5							5			
ESC																	
WSC																	
MTN																	
PAC																	
DIA TOTAL			4	10			1							15			
NE			1	5										7			
MA	2			28	1	1								34			
ENC																	
WNC																	
SA							20							21			
ESC																	
WSC																	
MTN																	
PAC																	
DIA TOTAL	2		1	53	1	2				3				62			

DOMESTIC SHIPMENTS - NON-PRESSURE SEWER PIPE - THOUSANDS OF FEET																
CATEGORY	NOMINAL PIPE DIAMETER - INCHES															
PIPE DIAMETER	4	5	6	8	10	12	14	15	16	18	20	21	24	REGION TOTAL		
CLASS 4000																
SHIPMENT REGION																
NE																
MA																
ENC																
WNC																
SA																
ESC																
WSC																
MTN																
PAC																
DIA TOTAL																
CLASS 5000																
SHIPMENT REGION																
NE																
MA																
ENC																
WNC																
SA																
ESC																
WSC																
MTN																
PAC																
DIA TOTAL																

GENERAL INSTRUCTIONS

1. This report is to be forwarded within 45 days following the month for which the report was made to: Priestland Associates
2321 Kimbro Street
Alexandria, VA 22307
(703) 768-8811

This report and the information contained in it will be kept confidential. The data regarding shipments contained in this report will be consolidated with similar data for the same month from other reporting companies. Only the totals for each category will be reported to and by the A/C Pipe Producers Association (AACPP). No totals will be reported for any category until such time as at least three companies have reported shipments in such category for a period of three consecutive months.

2. Do not include in your report shipments by your company to other AACPP members. Products shipped by your company to another AACPP member will be reported by that member upon shipment by it.

3. For purposes of this report NON-PRESSURE SEWER PIPE is defined as ASBESTOS-CEMENT pipe which is in conformance with CLASS 1500, 2400, 3300, 4000 and/or 5000 & UP specifications and which is shipped to a final destination within the continental U.S., including Alaska and Hawaii.
4. SHIPMENTS for purposes of this report mean FOOTAGE shipped in thousands of feet.
5. For purposes of this report: (a) EQUIVALENT TONNAGE means tons equivalent to the footage of 4-inch thru 24-inch non-pressure sewer pipe shipped to all regions regardless of Class and/or diameter without allowance for fittings, (b) TOTAL TONS includes fittings.
6. SHIPMENT REGIONS for purposes of this report correspond to AACPP reporting areas as geographically depicted in Figure 1.
7. The person at the reporting company to whom questions concerning the report are to be directed should be designated in the space provided.