



A/C Pipe
Producers Association

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ENCLOSURE 3

May 21, 1984

PLAINTIFF'S EXHIBIT

CAP-1109

By Hand

Mr. Victor J. Kimm
Director, Office of Drinking Water
U.S. Environmental Protection Agency
Room 1013
401 M Street, S. W.
Washington, D.C. 20460

Dear Vic:

The A/C Pipe Producers Association appreciated the opportunity to discuss the status of the National Revised Primary Drinking Water Regulations and the advisability of issuing a primary drinking water standard for asbestos.

It is clear that the Office of Drinking Water continues to be preoccupied by the increased incidence of gastrointestinal cancers in some heavily exposed worker cohorts. That this concern should persist more than a decade after first observance, and after the substantial epidemiologic and animal feeding studies showing no increased risks of gastrointestinal and other cancers, is puzzling. We encourage the Office to consider the most recent scientific review on this matter, notably that of the Ontario Royal Commission on Asbestos. The Royal Commission's report, released May 7, 1984, is an exhaustive analysis of asbestos health effects based on the scientific literature and sworn testimony by "an international who's who of asbestos experts" during fifty days of formal hearing. The 900 page report concludes:

The Commission links the health hazards of asbestos inhalation, not swallowing. Neither biological nor epidemiological evidence indicates that swallowing asbestos creates a health risk. In addition, the fibres found in water, often numbering millions per liter, are very short. The Commission concludes that concern about asbestos in drinking water, beverages and food is not justified.

To keep your office apprised of the TSCA proceedings related to asbestos, enclosed are (a) Dr. John Moore's response to the Asbestos Information Association's letter (March 22, 1984) to the Administrator, previously routed, (b) a follow-up letter to a meeting held with Dr. Moore and his staff, (c) another letter to Administrator Ruckelshaus. Another meeting will be held with Assistant Administrator Alm on May 29, 1984.

Putting aside legal issues for a moment, it is obvious that OTS' proposal, if promulgated, may raise considerable public concern about the safety of in-place A/C water pipe systems. There is a stigma attached to the term "banned product" and we

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doubt seriously that the general public will know or be able to discern that the rationale for the Agency's action is alleged residual risk from inhaled asbestos in workplaces. After all, the proposal would be issued by the Environmental Protection Agency, not the Occupational Safety and Health Administration. Ten years of widespread publicity about asbestos in drinking water and concerns about the safety of A/C pipe may only exacerbate this situation. Finally, consider that the Office of Drinking Water probably will not have made known prior to publication of OTS' proposal its findings on the health effects, if any, of asbestos in drinking water. All of this could conceivably culminate in requests for EPA to fund removal or relining of 350,000 miles of A/C water pipe systems in the United States. In sum, there is the potential for an admittedly irrational public reaction to OTS' proposal on A/C pipe, and the brunt of that reaction will impact the Office of Drinking Water.

The Association will continue to keep you and your staff updated on the TSCA proceedings. If you have any questions, please do not hesitate to call.

Very truly yours,

A/C PIPE PRODUCERS ASSOCIATION


John F. Welch
Vice President

JFW/bwm

Enclosure

cc: A. H. Kahn, Esq.
T. S. Hardy, Esq.
Dr. Joseph A. Cotruvo, Director, Criteria and Standards

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