

A/C Pipe
Producers Association

Internal Correspondence

TO Board of Directors
International Affairs Committee

FROM *J.F. Welch*
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: Board of Directors

L. Ambler
L. Cejudo
J. M. Couture
B. Layton
L. Taylor

International Affairs Committee

R. Dorner	E. van der Rest
A. Junes	E. Costa
G. Zaviezo	J. Schmaus
M. A. Elola	F. Mansour
A. Lluch	P. Hart
R. Hobbs	A. Saoulis
R. Jalan	V. Pattabhi
H. Hudson	C. Barton
S. Al-Tarkait	C. Saeng-Xuto
M. Delcourt	B. Giboin
B. Dubois	J. Bryant

0172081702
Chrono

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.

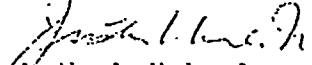
As you know, asbestos fibers are one of the most inert materials in common use. There has been no demonstrated health risk from exposure to asbestos properly bound into the cement matrix. The only identified health risks associated with asbestos has been with respirable fibers. The thrust of our testimony 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


Joseph A. Wade, Jr.
Vice President and Chief Engineer

CAPCO JEN 0011970