

To: R. H. Cuje

Date: May 18, 1981

From: J. L. Fischer

Copies: File/Chrono

Subject: ASBESTOS INGESTION STRATEGY

RECEIVED MAY 28 1981

PLAINTIFF'S EXHIBIT

CAP-748

A meeting was held on May 15, 1981 to review a proposed asbestos ingestion strategy. Those attending were:

John Fischer, Pipe Division
Jack Cran, Pipe Division
Hal Olson, Pipe Division
Dr. James Leineweber, H. S. & E.
Jim Reis, Asbestos Policy
Wyatt McCallie, Legal

Corporate Relations and Advertising were unable to attend due to previous commitments.

The attached outline of an asbestos ingestion strategy was reviewed and, in general, met with acceptance. Some items where total concurrence was lacking and where additional action will be taken are:

Advertising: Further input from Jerry Attridge and Curt Linke will be sought. H. L. Olson will contact Jerry and Curt and set up a meeting.

Coating A/C: An analysis will be made by H. L. Olson of our present market area to determine the amount of this market that is in "soft water" areas.

Joe Jackson will be advised that J-M believes the ACPPA should develop an aggressive water policy guideline similar to J-M's.

Field Cutting and Machining: Additional effort should be expended by ACPPA to eliminate or minimize the need to field cut and machine A/C. Abrasive disc cutters are still being used in spite of our efforts to stop the practice. The development of a fitting that would connect to rough barrel pipe is a possible solution that H. L. Olsen will explore with the technical committee of ACPPA.

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Our district sales managers have been requested to advise what they believe to be the most important functions of ACPPA and what, if any, additional actions they would like to see them take.

Would you please review the attachments and advise if you have any questions.

After we have your input, the district managers' comments have been received, and the above specific items resolved, we will be in a position to meet with Earl Parker and Jim Reis to discuss the interrelationship between AIA and ACPPA and we should be in a better position to address the best method of approaching the EPA to finally resolve the ingested asbestos problem. The third page of the outline proposes a first-step action plan in this regard.

Once the ingested asbestos issue has been resolved, the ACPPA can finally get on with its important function of developing and promoting markets for A/C pipe.

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Asbestos Ingestion Strategy

I. Response to asbestos and health related to field problems:

- A. Our goal is to prevent field crisis from developing by keeping those who need to know informed about the facts regarding the ingested asbestos issue before a crisis situation develops. See "Pipe Division Asbestos & Health Program" (attachment #1)
- B. In the event a field problem does develop: Follow the protocol for handling field problems contained in AACPP's "Management Information System (M.I.S.) No. 12-80. (attachment #2)

II. Advertising:

- A. AACPP should switch the major emphasis of their advertising to more aggressively addressing the asbestos and health problem, and their primary target audience to be the "secondary ring of influence" i.e. elected public officials. See M.I.S. No. 12-80. (attachment #2)
- B. J-M advertising to emphasise features and benefits of A/C pipe.

III. Response to formally proposed governmental asbestos regulations: A.I.A. to assume prime responsibility with assistance as required by AACPP (See "Inter-relationships between A.I.A. & AACPP on the Asbestos & Health Issue" (attachment #3)

IV. Coating the I.D. of A/C Pipe. Where aggressive waters are to be transported thru A/C pipe our recommendation is to:

- A. Treat the water to a less aggressive state.
- B. Recommend a suitable internal coating if water treatment is not employed.
- C. An analysis of material that can enter the water from our present and proposed future coating to be analyzed by the National Sanitation Foundation. A report by their toxicology group will be prepared. See "Division Policy on Aggressive Waters" (attachment #4)

V. Field cutting and machining - Compliance with O.S.H.A. asbestos dust regulations.

- A. J-M will develop a program to advise contractors and installers about OSHA's asbestos dust regulations, and to develop means to minimize the need to cut and machine A/C pipe in the field. See Division Bulletin

- A. "Asbestos & Health - Use of Abrasive Disc Cutters" (attachment #5)
- B. J-M will assist in disseminating recommended work practice manuals to contractors and installers. See Division Bulletin "Field Practices - Asbestos Cement Pipe" (attachment #6).
- C. To minimize A/C pipe field cutting and machining, J-M will promote the use of:
 - 1. P.V.C. closure sections in 6", 8", 10" & 12" sizes.
 - 2. Short closure sections down to 19" long that will eliminate or minimize the need to cut MOA's in the field.

VI. To finally resolve the asbestos ingestion issue, J-M in concert with AACPP will:

- A. Secure statements from State Public Health Officials regarding their policy about the use of A/C pipe and asbestos in potable water. We already have nine such letters. Our district health coordinators have an assignment to secure additional letters.
- B. Secure statements from recognized authorities in the medical and epidemiology field regarding the ingested asbestos and health situation.
 - 1. From A/C Pipe Company Corporate Medical Directors. We have such a letter from Dr. Kotin. Dr. Mellon from Certain-Teed has promised to write a similar statement.
 - 2. From recognized authorities in the medical and academic field. Dr's Kotin and Mellon have promised to assist in this endeavor.
- C. Secure a favorable statement from AWWA on their position regarding asbestos in potable water supply. There is a committee assigned to write such a statement. Joe Jackson is on this committee.
- D. H. L. Olson will develop an estimate of the dollar expenditure by the U.S. water utility industry to count asbestos fiber in source and distribution water. These counts are going on now and accelerating at a significant rate. If they continue, unchecked, it could well amount to an annual expenditure reaching into the hundreds of millions of dollars annually by the 60,000 water utilities in the U.S.

E. As soon as practical a strategy meeting should be held by the following to develop the best means to use the information gathered in A, B, C & D to persuade the new administrator of E.P.A. to announce their studies of asbestos in water supply shows that the minute amounts of asbestos found in potable water do not indicate they represent a measurable health hazard.

1. A.I.A. - Jim Reis, Tom Dougherty, Bob Pigg, Kirkland and Ellis.
2. A.A.C.P.P. - Joe Jackson, John Welch, Lewis & Gilman.
3. J-M Washington Affairs Office - John Linquist
4. J-M Denver - Curt Linke, Jerry Attridge, Wyatt McCallie and Hal Olson.

Pipe Division
Asbestos & Health Program

Our basic asbestos and health plan is predicated on the following as being axiomatic.

1. There is no measurable health hazard associated with the use of A/C pipe in the water utility market.
 - a. Ingestion of asbestos in water supply is believed to be no health hazard.
 - b. Pipe can be handled safely in the construction phase by following established recommended work practices.
2. If the health facts associated with the use of A/C pipe can be fully explained in a rational environment, i.e. before hysteria or irrational prejudice has developed, we will not have problems regarding usage of A/C pipe.

There are three basic spheres of influence we must reach with our educational program to avoid having problems.

A. First sphere of influence - Those who are directly involved.

1. Sales force
2. Utility managers and their staff.
3. Design engineers
4. Utility contractors
5. State and Federal governmental health officials.

B. Second sphere of influence - Upper level officials and the medical fraternity.

1. City and County elected officials (Mayors, Supervisors, Councilmen etc.)
2. State Senators and Representatives
3. U.S. Senators and Representatives
4. Medical officials and doctors.

C. Third sphere of influence - The general public.

It is recognized that the difficulty in delivering our message to each sphere of influence becomes progressively more complex and expensive as we expand outward from Sphere #1. Our efforts to date have been primarily to Sphere #1. Our efforts are now expanding to try to reach Sphere #2. We have no definite plans to reach Sphere #3, except on a spot basis, as the cost would reach into the millions of dollars. We therefore recognize we cannot totally contain the problem.

Thru the following action plans our efforts to reach Sphere #1 has been reasonably successful and has essentially kept our A/C business intact to date.

1. Information on asbestos and health issue to sales force thru:
 - a. Health Fact Bulletins - Sixty bulletins have been issued over the past five years.
 - b. Speeches at district sales meetings.
 - c. Travel with sales force in the field on specific problems.
 - d. Appointment of, and an education program for, "District Health Coordinators".
2. Coordinated effort with other A/C pipe producers thru the Association of A/C Pipe Producers.
 - a. A/C Pipe Producers staff has prime responsibility for programs and contacts with Federal governmental office, and local problems where legal assistance is required. They will also become involved at the local or state level when specifically requested by member companies.
 - b. AACPP staff to maintain a "laundry list" of all Federal, State and local problems and update activity of each one on a monthly-semi monthly basis.
 - c. Member companies will handle programs at the state and local level (with the exceptions noted in 2. a. and keep ACPPA staff informed of their activities.

AACPP Public Affairs Committee

I. Regulatory Affairs Program

- A. Economic Impact Analysis of Total or Partial Ban on A/C Pipe
 - A. D. Little Company contract
- B. Risk assessment of substitute pipe materials. Deferred due to budget limitations, and an opportunity to secure government generated data on the subject.
- C. Audit of Asbestos Exposure Levels During Product Life Cycle.

Deferred. A.J.A. contemplating audit via EPA TSCA section 8. (a) reporting form.

I. Regulatory Affairs Program (Cont'd)

- D. Technical/Economic Feasibility Studies of Reduced Exposure.
- E. Medical Evidence/Risk Assessment of Low Level Asbestos Exposure.

To be coordinated by Dr. Kotin.

- F. Retention of Special Legal Council to Monitor State Legislatures Bills.

II. Public Education Program

A. Fact Book/Inserts

Update "A/C Pipe and Health" and prepare special inserts for a specific audience. (City Council, Water Utility, Medical Groups, General Public etc.)

B. Media Backgrounds

Press Kit on risk/benefits of A/C pipe.

C. Advertising

A/C Pipe safety - Place in magazines aimed at Second Sphere of influence i.e. National City, Western City etc.

D. Audio Visual program update.

E. Crisis Response and Management Information Team.

Organize and train a crisis management team to coordinate industry response to field problems.

F. Seminars

Prepare "State of the Art" medical paper supporting industry positions for direct mail to public officials, present at selected seminars and publish if possible.

G. Utility Initiative

Establish "core market" areas for priority attention. Prepare camera ready mailer suitable for use by water utilities with field problems.

II. Public Education Program (Cont'd)

H. Recommended Work Practices

Update R.W.P. to reflect recent developments.
Develop contractor certification form.

Other areas where action on asbestos and health is taking place include:

A. American Water Works Association

1. Committee on Use of Asbestos in Utility Construction.

a. Committee developed a recommended work practice manual - Will update as required.

2. Committee to develop an AWWA policy on asbestos in water supply.

B. American Society for Testing Materials

1. A subcommittee has been formed to revise the ASTM-C-500 Specifications section "Environmental Aggressiveness" which deals with the use of A/C pipe under aggressive water and soil conditions. The objective will be to clarify the section so that it will not be interpreted as being health related.

C. A.I.A./N.A.

1. Response to A.N.P.R.M.'s from E.P.A. and Consumer Products Safety Commission, is being coordinated by AIA/NA. The AACPP is cooperating with AIA/NA in this area.
2. Revised OSHA Asbestos Standard. Program is being coordinated by AIA/NA with cooperation of AACPP.

Recommendations for additional actions:

1. Reestablish an interdivisional asbestos coordinating committee to provide a means to communicate between:
 - a. Asbestos Committee
 - b. H.S. & E.
 - c. Divisions
 - d. Washington Affairs Office
 - e. Corporate Relations
2. Establish a team that is prepared to present the asbestos industry's side of the story to major industrials who have established a "no asbestos" policy, and to prevent more major industrials from doing so.
3. In order for Divisions to develop their individual goals, plans, and strategies fully regarding the asbestos issue, a need exists for the corporation to clearly communicate to the Divisions the Corporate goals, plans and strategies.
4. Our sales force is being exposed on a daily basis to a flood of adverse asbestos articles appearing in the media and are required to defend our asbestos containing products to their customers, governmental agencies and frequently to the community at large. They do not see our corporation vigorously defending our asbestos containing products. A more visible defense is required to maintain employee morale.