

PW Pipe

Fax #

503-686-9248

Legal Firm -

Sweeney + ? - Wash. D.C.

July 29, 1993

Document Processing Center (TS-790)
(Attn: Section 8(e) Coordinator)
Office of Toxic Substances
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington D.C. 20460

Re: TSCA 8(e) Submission:

Dear Section 8(c) Coordinator:

This submission is being made pursuant to TSCA Section 8(e) on behalf of Pacific Western Extruded Plastics Company ("PW Pipe"), 1550 Valley River Drive, Eugene, Oregon 97401-2122. The following information is being reported under TSCA Section 8(c); however, for the reasons set forth below, PW Pipe believes that it is not required to do so.

On July 8, 1993, PW Pipe obtained information generated by EPA concerning vinyl chloride contamination of drinking water at a rural water district in Kansas. At that time, PW Pipe learned that EPA had determined that the contamination may have been caused by vinyl chloride leaching from PVC pipe that was installed in the described rural water distribution system in the "late 60's and early 70's". The attached EPA letter and enclosure, which PW Pipe received on July 22, 1993, sets forth the pertinent information. The enclosure indicates that the PVC pipe in question has been found to be pipe that contains higher concentrations of vinyl chloride monomer than is allowed in pipe certified for potable water use (the "Product").

PW Pipe does not believe the information is reportable by it under TSCA Section 8(c) for the following three reasons. First, PW Pipe did not manufacture the PVC pipe which is the subject of this submission and it does not currently manufacture the Product.¹ It is not a "manufacturer, processor or distributor" of the Product for purpose of TSCA Section 8(c) reporting.

Second, PW Pipe believes that "the Administrator has been adequately informed of this information" in light of EPA's extensive involvement in this matter. (See attachment). Third, PW Pipe does not believe that the sampling and analysis reported in EPA's letter supports the conclusion that the pipe presents a "substantial risk of injury to health or the environment".

¹ PW Pipe may have manufactured the Product prior to 1975 before there were standards concerning the content of vinyl chloride monomer ("VCM") in PVC resin; however, PVC pipe manufactured by PW Pipe since 1975 is manufactured using resins that meet national standards concerning the level of VCM in the resin. The PVC pipe currently manufactured by PW Pipe is tested and certified for drinking water use by the National Sanitation Foundation.

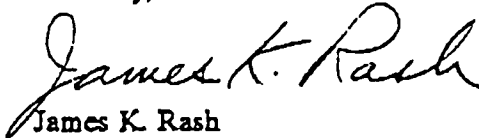
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PWPipe has no reason to believe that any pipe manufactured by it at any time is like the Product. Even though PWPipe does not believe that it is required to do so, it is reporting this information to the TSCA Section 8(e) Coordinator.

As noted above, the technical data and information obtained by PWPipe is contained in the attached EPA letter. That EPA letter provides the TSCA Section 8(c) Coordinator with the data relevant to this submission obtained by PWPipe and describes the nature of the exposure information being reported.

Please call me at (503) 343-0200 if you have any questions.

Sincerely,


James K. Rash
President

JKR/sc

Attachment

cc: J.R. Breed
Terry Quill

CTL032793

APR 05 1993



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

APR 1 1993

Mr. Dave Eckstein
Uni-Bell PVC Pipe Association
2655 Villa Creek Drive
Suite 155
Dallas, Texas 75234

Post-it® brand fax transmittal memo 7671

of pages: 3

To: <i>Jim Rash</i>	From: <i>Dave Eckstein</i>
Co:	Co:
Dept:	Phone #
Fax #	Fax #

~~Dear Mr. Eckstein:~~

This letter is a follow-up to our phone conversation of March 22, 1993, in which we discussed scheduling a conference call on possible solutions to the vinyl chloride contamination of a Kansas public water supply. As I mentioned in our phone conversation, a conference call has been scheduled between yourself, Dr. James Goodrich of EPA-Cincinnati, Mr. Dave Waldo of Kansas Department of Health and Environment, Ralph Flournoy, Chief of the EPA Region VII Public Water Supply Section, and myself, the Kansas Coordinator in the EPA Region VII Public Water Supply Section. The conference call is scheduled for April 8 from 9:00 to 10:00 A.M. CST. The phone number to call for the conference call is (202) 260-3832.

I have enclosed a narrative summary of the information we have on the vinyl chloride contamination of the public water supply system. If you have any questions about the information in the summary, please call me at (913) 551-7440. We look forward to your assistance with this contamination problem.

Sincerely,

Elizabeth Murtagh Yaw
Kansas PWS Program Coordinator
State Programs Section

Enclosure

CTL032794

VINYL CHLORIDE CONTAMINATION OF DONIPHAN CO. RWD #5, KANSAS

KDHE detected vinyl chloride in the distribution system of Doniphan Co. RWD #5 at concentrations between less than 1 ppb to 8.9 ppb in June 1992. Doniphan Co. RWD #5 purchases water from Wathena, KS, who has not had vinyl chloride detected in its water. This fact, along with the fact that no other VOCs were detected in the distribution system, led to suspicions that the vinyl chloride may be leaching from the PVC pipe in the distribution system. The PVC pipe in the distribution system is fairly old, with about 40% of it installed in 1968, 40% in the early 1970's, and the remainder in the mid-1970's. Repairs to the system were made in the early 1980's with PVC pipe that is not certified for drinking water use.

Following up on the situation, KDHE conducted sampling of six or seven other rural water districts in Kansas constructed about the same time as Doniphan Co. RWD #5 with PVC pipe. Three samples were taken from each of the other rural water districts sampled. A couple of the rural water districts had vinyl chloride at concentrations above 1 ppb in one sample. KDHE resampled those rural water districts with detections of vinyl chloride above 1 ppb, but did not find significant concentrations of vinyl chloride in any other water supply.

In September 1992, KDHE conducted additional sampling at Doniphan Co. RWD #5. Nine samples were collected at different locations in the distribution system. Results ranged from 2.9 to 7.4 $\mu\text{g/l}$ vinyl chloride. KDHE conducted tests on sections of PVC pipe from the water district that were cut out in making repairs to the system. Three sections of PVC pipe were filled with water containing 1 mg/l free chlorine and allowed to stand undisturbed for 10 days. The results showed that 11.1, 7.8, and 7.2 $\mu\text{g/l}$ were measured in the three sections of pipe after 10 days. The tests were also conducted on sections of PVC pipe from the water district after being filled with distilled water containing no chlorine and allowed to stand for 10 days. Upon analysis, the distilled water from all three sections of pipe contained between 5 and 15 ppb vinyl chloride.

In December 1992, KDHE sent sections of PVC pipe from the rural water district to the National Sanitation Foundation (NSF) for analysis. The NSF has a standard procedure for checking PVC pipe for vinyl chloride monomer, which might leach into the water, before certifying it for potable water use. NSF conducted the tests on pipe sections from Doniphan Co. RWD #5 and found much higher concentrations of vinyl chloride monomer in the pipe than is allowed in pipe certified by NSF for potable water use. NSF sent KDHE a written report, with more specific information on the tests run and results found. We have requested a copy of the

NSF report. KDHE believes they have collected enough samples from different areas of the distribution system to conclude that the vinyl chloride appears to be leaching from the oldest 70 - 80% of the distribution system, that is, the pipe that was installed in the late 60's and early 70's.

KDHE provided public notice of the vinyl chloride contamination to the rural water district's customers in July 1992. People were advised to use an alternate source of water for drinking. EPA has written KDHE requiring that public notice be provided again, and continue quarterly, as long as the violation continues.

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