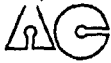


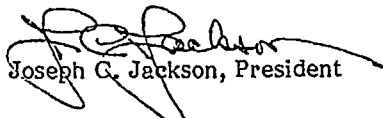
PLAINTIFF'S EXHIBIT

CAP-1015



A/C Pipe
Producers Association

Internal Correspondence

TO Public Affairs Committee
FROM 
Joseph G. Jackson, President
SUBJECT AWWA Policy Statement
Asbestos in Water

DATE: June 1, 1981

ACTION REQUIRED: (a) Immediate and critical review
(b) Revisions to draft language at 6/9/81 PAC meeting.

Attached for your immediate and critical review is Draft No. 3 of AWWA's proposed policy statement on asbestos in water. The transmittal letter from George Symons, Chairman of the Water Quality Division (WQD) Ad Hoc Committee, has been included so you can better gauge the political climate and procedural constraints which will prevail during AWWA deliberations on the proposed statement in St. Louis.

As AACPP representative to the WQD Ad Hoc Committee, it is essential that I have the benefit of your collective thoughts on this critical issue. Thus, come prepared to discuss and reach a consensus on revisions to the draft language at the PAC meeting scheduled for 6/9/81. Since the AWWA Ad Hoc Committee will meet the following morning, we must reconcile any in-house differences before the PAC meeting adjourns.

If you have any questions, please give John or me a call.

JCJ/ajb

Enclosure

cc: A. Kahn, Esq.
N. Rahn, Esq.

copies to: Public Affairs Committee

H. Olson
B. Cook
I. Adams
✓ W. Perrell
J. Woods
J. Baker
T. Dougherty
D. Stinson
W. McCallie
B. Collier

SIS/1
PACMEMO
Chrono

CAPCO JEN 0031700



RECEIVED MAY 28 1981

American Water Works Association | 6666 West Quincy Avenue | Denver, Colo. 80235 | 303 794-7711

REPLY TO:
GEORGE E. SYMONS, Ph.D.
86 Edgewood Avenue
Larchmont, N. Y. 10538
May 23, 1981

Memo To: Comm. Members - WQD Ad Hoc Comm. on Asbestos in Water
Re: 3rd Draft - AWWA Policy Statement

Sorry! I am running about ten days late on my schedule, but you should have this draft in time to review the text and be prepared to discuss and vote on its provisions during the committee meeting in St. Louis, on Wed. June 10 at 9:00 am in the Cervantes Center-Room 271.

If you do not plan to attend the committee meeting, please make your suggestions on the enclosed draft and mail it to me (before June 7), addressed to me

c/o Sheraton St. Louis Hotel
910 North Seventh St.
St. Louis, MO 63101

(I shall leave Larchmont on June 2nd and shall arrive in St. Louis on Fri. June 5)

About the enclosed draft:

- I have tried to consolidate and simplify the essence of ten revisions of Draft No. 2, into one coherent text, accepting some suggestions, rejecting others, including some alternatives, etc.
- Where suggestions were made for word or phrase changes, I have placed the possible alternative language in parentheses above the original wording.
- Where I agreed completely with suggested revisions, I included them, as suggested.
- Where I did not fully agree with suggested revisions (for whatever reason), I indicated suggested deletions in brackets and suggested word changes in parentheses.
- There were many variations in word choice, even paragraph revisions, and suggested whole new paragraphs, some dealing with details. Many might well be accepted when we meet, others seem doubtful of consensus. ----- In approaching this Draft No. 3, I took the position that AWWA's policy should be broad, with limited "whereases" and free from specific details as to sampling, analytical techniques, particle size, particle numbers, particle identification, etc. and status of current studies.

President JEROME B. GILBERT, Sacramento, California
President-Elect KENNETH J. MILLER, Denver, Colorado
Vice President JOHN H. STACHIA, Dallas, Texas
Immediate Past-President DONALD K. SHINE, Wyoming, Michigan
Treasurer THOMAS J. BLAIR, III, Charleston, West Virginia
Executive Director DAVID B. PRESTON, Denver, Colorado

CAPCO JEN 0031701

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May I ask that you read the enclosed draft carefully, referring as you may wish to the copies of Draft No. 2 comments which you received from other committee members.

Jeptha Wade's letter contained several good suggestions, but I decided not to attempt to draft statements for him. If Jeptha wishes he may draft his preferences for wording at this time, and we'll review it at the Committee Meeting. The same consideration goes to other members of the Committee, but I hope that you will all be willing to work on this draft and not to propose whole new approaches.

For the committee meeting procedure, I propose:

1. Decide on the method of establishing a consensus with regard to format, content, specific wording, etc.
2. Review Draft No. 3, paragraph by paragraph and sentence by sentence, if necessary, considering word choice if need be.
3. Consider possible new additional paragraphs, or extensive revisions of paragraphs; i.e., consider some of the suggestions made with respect to Draft No. 2, that did not get into Draft No. 3.

I look forward to seeing you in St. Louis. I hope that all of you will be able to attend the Committee Meeting.

Sincerely,

George E. Symons
George E. Symons,
Committee Chairman

AWWA Policy Statement on Asbestos in Drinking Water

#1 Because appreciable numbers of water supply consumers have expressed concern about possible health effects of asbestos in drinking water, the American Water Works Association has adopted this policy statement concerning the education of the public ^{on the subject} and appropriate actions to be taken by water utilities.

#2 As a prelude to establishing this policy, the Association considered [and evaluated] available information on the subject and concluded that [at this time] certain known and accepted facts are pertinent, to wit:

- Asbestos may enter water supplies from naturally occurring

geologic formations in the earth's crust; occasionally, it

#3 may enter water supplies as the result of man-caused activities.

Asbestos may also leach into drinking water from asbestos-containing [pipes and] materials in contact with the water, if that water is specifically ^{corrosive} _{aggressive} toward asbestos-cement materials. Note: not all aggressive waters will corrode asbestos-cement pipe or asbestos-containing materials.

- Although studies have shown that inhalation of airborne asbestos
- #4 fibers has produced disease in human beings with high-level occupational-related exposure, there is no conclusive evidence that the

2
results of these studies may be extrapolated meaningfully to determine physiological effects in humans who ingest asbestos [particles] in drinking water. Furthermore,

[there are no clear-cut research data]
(there is no substantial body of data) which indicate that ingestion of water-borne asbestos fibers by human is detrimental to health.

[Alternative A to Par. 4]

94
Alt. A
• Although studies have shown that inhalation of air, heavily laden with asbestos fibers, has produced adverse human health effects, there is no evidence that the results of these studies may be extrapolated to determine health effects of water-borne asbestos. Furthermore, several studies on health effects of water-borne asbestos carried out to date have failed to show a definite health risk.

[Alternative B to Par. 4]

94
Alt. B
• Although it is scientifically accepted that inhalation of asbestos fibers has produced cancer in human beings, it is uncertain whether the results of occupational airborne asbestos studies can be used to determine the risk of ingested asbestos. At this time, there are no definitive human or animal data which prove that ingestion of water-borne asbestos fibers is injurious to human health. However, because some studies suggest that ingested asbestos is not completely without effect on the body, several important research studies are presently underway to pro-

vide more definitive information on the effects of ingested asbestos.

- Treatment of raw water by filtration {frequently
significantly} reduces the number of asbestos fibers in water [supplied to the consumer].

Part 5

Treatment of water to reduce its {corrosive
aggressive} characteristics (or to provide a corrosion inhibitor) will reduce the {likelihood
tendency} of asbestos {being released
to be released} (or stop the leaching of asbestos) from asbestos-containing [pipe or] materials in contact with corrosive waters. [Surface treatment of asbestos-containing pipe and materials before use, or after cleaning, will reduce the leaching effect of aggressive waters on asbestos-containing pipe of materials.]

- [At the present time], no federal regulations prescribe maximum allowable concentrations of asbestos fibers in drinking water or mandate adjustment of the {corrosive
aggressive} characteristics of water to be carried in [asbestos-cement pipe] (water distribution systems).

Part 6

In consideration of these facts, it is the policy of the American Water Works Association that:

Part 7

- The Association has a responsibility to keep its members fully informed on the subject of asbestos in drinking water;
- Water utilities have a responsibility to share this information with their customers and with local health authorities, when appropriate to the local situation.

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49

Q 10

- Where public concern is evidenced or customer inquiry made about asbestos in the local drinking water supply, every water utility should respond promptly and knowledgeably;

Q 11

- Where asbestos fibers are present in the local water supply, the local water utility should take steps to ascertain the necessary actions to avoid, reduce, or remove such fibers, if such action is indicated;

Q 12

- Utilities that use asbestos-cement pipe in their systems should follow established and approved AWWA procedures for handling, cutting, machining, and tapping A-C pipe.

Q 13

- Research on any possible causal relationship between asbestos in drinking water and adverse health effects should continue until definitive data are obtained;

Q 14

- Until a causal relationship has been established definitely between asbestos in drinking water and adverse health effects, restraint should be exercised in the promulgation, adoption and enforcement of standards and regulation with respect to asbestos in drinking water.