

DRINKING WATER COOLERS OUTLINE

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I. Drinking Water Coolers I

A. Federal Register Notice 54 FR 14316, 54 FR 14320

1. Federal Register: Drinking Water Coolers that are not Lead Free; proposed list and request for comments. Vol. 54, No. 67. Monday April 10, 1989. pp. 14320-14322.
2. Federal Register: Lead Contamination in School Drinking Water Supplies; Guidance Document and Testing Protocol; Notice of Availability and Request for Comments. Vol. 54, No.67. Monday April 10, 1989. pp. 14316-14318.

B. References Cited in Federal Register Notice

1. The Nature and Extent of Lead Poisoning in Children in the United States: A Report to Congress. Agency for Toxic Substances and Disease Registry. Public Health Service. U.S. Department of Health and Human Services. July, 1988.

C. Letters

1. December 18, 1987. From T.R. Benua, EBCO Manufacturing Co. To Henry A. Waxman, Edward R. Madigan, U.S. House of Representatives. Concerns letter from Waxman on December 11, 1987. EBCO request for deadline extension of information to January 29, 1988. 2 pp.
2. December 18, 1987. From Thomas L. Miller, Sunroc Corp. To Henry A. Waxman, U.S. House of Representatives. Request for extension of deadline to January 30, 1988 of requested information. 2 pp.
3. December 22, 1987. From Doyle Raymer, Halsey-Taylor. To Barry L. Johnson, U.S. Public Health Serv. From Research and Development director at Halsey-Taylor concerning Navy test results and methods of drinking water coolers. 3 pp.
4. December 23, 1987. From Kevin J. Byrne, Household Manufacturing. To Henry A. Waxman, Edward R. Madigan, U.S. House of Representatives. Concerns phone conversation between Waxman and Household Mfg. on December 21, 1987, also Waxman letter on December 11, 1987. Refers to water coolers with pinhole defect. Production stopped March 5, 1979, problem corrected. 3 pp.
5. December 23, 1987. From Arnold W. Braswell, Air-Conditioning and Refrigeration Institute. To Barry Johnson, U.S. Public Health Serv. Correction on report by House Subcommittee Health and Environment. 2 pp.

6. January 21, 1988. From Thomas Millar, President of Sunroc Corporation to Henry Waxman, U.S. Representative. Response to information requested by Representative Waxman. 2pp.
7. January 21, 1988. From T.R. Benua, Jr. of EBCO Manufacturing Co. To Arnold Braswell, President of AR1. Concerns data on water cooler coolers manufactured by EBCO.
8. February 4, 1988. Release from the U.S. House of Representatives, Committee on Health and the Environment. Refers to information received from drinking water cooler manufactures. 3pp.
9. February 12, 1988. From T.R. Benua, EBCO Manufacturing Co. To Henry A. Waxman, Edward R. Madigan, U.S. House of Representatives. Refers to correction in EBCO letter dated January 21, 1988. 1 pp.
10. June 21, 1988. From Michael B. Cook, ODW. To Doyle Raymer, Halsey-Taylor. Request of information. Refers to Halsey-Taylor letter sent June 10, 1988. Also phone conversation with EPA May 31, 1988. 3 pp.
11. June 24, 1988. From Henry A. Waxman, U.S. House of Representatives. To Robert A. Hoagland, Halsey-Taylor. Refers to Waxman letters January 22, 1988 and December 11, 1987. Also refers to EPA letter on June 21, 1988. 2 pp.
12. July 5, 1988. From Thomas J. Sorg. EPA/WERL. To Peter Lassovszky, ODW. Concerning test results of Navy coolers. 1 pp, 1 att.
13. July 12, 1988. From Rebecca Hanmer, AA, OW. To Terrance Scanlon, Chmn., U.S. CPSC. Refers to January 1988 testing of Navy coolers. Also Halsey-Taylor water coolers production 1979. 2 pp.
14. September 13, 1988. From David Schmeltzer, vs. CPSC. To Rebecca Hanmer, AA, OW. Refer to Halsey-Taylor meeting with EPA in July 1988. Also addresses Halsey-Taylor's corrective action taken on water coolers 1979. 2 pp.
15. September 23, 1988. From R.A. Hoagland, Jr., Halsey-Taylor Manufacturing Co. To CPSC. Regarding coolers with lead-lined tanks made by Halsey-Taylor and the discontinuation of use of lead. Contains testing results. 5pp.
16. March 21, 1989. From Robin G. Munden, Household Manufacturing. To Jeanne Briskin, ODW. Concerning Halsey-Taylor test results on HAWs coolers. 1 pp.

D. Testing Results

1. Testing Results at EPA Headquarters

- a. December 14, 1987. From Lawrence J. Jensen, EPA/OW. To Arnold Braswell, Air Conditioning and Refrigeration Institute. Concerning Navy Testing results of water coolers. 1 pp, 1 att.
- b. December 23, 1987. Memorandum From Larry Worley, Region 10. To Peter Lassovszky, EPA/ODW. Lead monitoring survey, reg. 10. 1 pp, 2 att.
- c. December 23, 1987. From Robert W. Lange, EPA. To John Trax, Jeanne Briskin, Paul Baltay, Peter Lassovszky, ODW. Region 3 lead monitoring survey. 1 pp and attachments.
- d. February 7, 1988. Draft. Evaluation of Water Coolers for Lead Leaching, Drinking Water Research Div. Testing of 24 drinking water coolers for lead leaching. 5 pp, 1 att.
- e. February 12, 1988. Memorandum From Jim Scherer, Region 8. To All Employees. Lead monitoring survey. 2 pp, 3 att.
- f. June 20, 1988. Memorandum From Steve Pardieck, Reg. IX. To Steve Buchanan, OSHA. Survey of regional lead in drinking water monitoring efforts. 2pp. 2 att.
- g. July 1, 1988. Memorandum From Walter E. Andrews, Reg. II. To Stephen E. Buchanan, Occupational Health & Safety Staff. Region 2. Lead monitoring survey. 1 pp, 3 att.
- h. July 1, 1988. From Thomas J. Sorg, EPA/DWRD. To Doyle Raymer, Halsey-Taylor. Information on 12 Navy drinking water coolers. 1 pp, 1 att.
- i. July 5, 1988. From Thomas J. Sorg, EPA/DWRD. To Doyle Raymer, Halsey-Taylor. Concerning reservoir tanks and information of Navy drinking water coolers EPA gave to Halsey-Taylor. 1 pp and attachments.
- j. July 19, 1988. Transmission from Ralph Langemeir, EPA, to Peter Lassovszky, EPA/ODW. Attachment: Memorandum From Billy Fairless, EPA, Reg. 7. To Susan C. Gordon, Asst. Reg. Admin. for Policy and Mgmt; Paul Walker, Water Mgmt. Div. Region 7 Lead monitoring survey. 2 pp and attachments.

- k. August 23, 1988. Memorandum From Peter Lassovszky, ODW. To Thomas J. Sorg, EPA/DWRD. Concerning test results on reservoir tank scraping of 6 manufacturers. 2 pp, 1 att.
 - l. December 12, 1988. Memorandum From John C. Chamberlain, OA, Michael B. Cook, ODW. To All Headquarters employees. EPA Headquarters review of lead in EPA's drinking water. 1 pp, 1 att.
 - m. February 9, 1989. Memorandum From Thomas J. Sorg, EPA/DWRD. To Peter Lassovszky, ODW. Test results of a drinking water coolers from Portland, ME. 1 pp and attachments.
 - n. February 14, 1989. Memorandum From Peter Lassovszky, ODW. To Stephen Buchanan. Thru Michael B. Cook. Concerning EPA Headquarters remedial action. Also enclosed are the results of 9 drinking water coolers. February 9, 1989 Sorg letter attached. 3 pp and attachments. (See DWC-I, D.2.j)
 - o. Undated. EPA test results of drinking Water Coolers from a Navy facility. 2pp
2. Testing Results at Other Locations
- a. December 28, 1987. From B.P. Sack, Dept. of the Navy. To U.S. EPA. Concerning lead testing in drinking water sources in Navy research and development. 2 pp and attachments.
 - b. January 21, 1988. From T.R. Benua, EBCO Manufacturing Co. To Arnold Braswell, ARI. Information given to ARI. Cooler production and list. 2 pp and attachments.
 - c. January 21, 1988. From Thomas L. Millar, Sunroc Corp. To Arnold Braswell, Air Conditioning and Refrigeration Inst. Information given to ARI. Refers to letter from Waxman January 21, 1988, Cooler production 1979-1987, Cross production total 1972-1978. 1 pp and attachments.
 - d. January 21, 1988. From Herbert Phillips, ARI. To Peter Lassovszky, ODW. About phone conversation January 20, 1987. Enclosed is ARI proposal for sampling procedure. 1 pp, 1 att.
 - e. March, 1988. Water Cooler Lead Contamination Study. By David W. Heumann, et. al., Water Quality Div., Los Angeles Dept. of Water and Power. 27 pp, 1 att.

- f. July 1, 1988. From Doyle Raymer, Halsey-Taylor. To Michael B. Cook, ODW. Reference to June 28, 1988 phone call requesting information and lead tanks. 1 pp.
 - g. July 6, 1989. From Grace Schultz, The Reading Center. To Lead Docket. Lead data from school testing. Also inquiry on lead. 1 pp, 1 att.
 - h. July 12, 1989. From Thomas J. Sorg, EPA/DWRD. To Peter Lassovszky, ODW. Water cooler lead data from ORD in Cincinnati. 1 pp, 1 att.
 - i. July 17, 1989. From Robert M. Sussman, Latham & Watkins. To Jeanne Briskin, ODW, FOIA of Halsey-Taylor to get Navy test results. 1 pp, 1 att.
 - j. Updated Summary Table. Lead Leached from Water Coolers. Cincinnati Tap Water. 9 pp. (See DWC-I, D.1.n)
 - k. Undated. Navy Coolers. List of tests and results of Navy coolers. 11 pp.
 - l. Undated. ODW Drinking Water Data from Carderock (David Taylor Model Naval Basin). 8 pp.
- E. Lead Contamination Control Act
- 1. October 3, 1988. Lead Contamination Control Act 1988, as reported by the House Committee on Energy and Commerce. H. Report.100-1041. 25pp.

II. Drinking Water Coolers II

A. Federal Register Notice 55 FR 1772-1776

1. Federal Register: Drinking Water Coolers that are not lead free; notice and request for comments. Vol, 55, No. 12. Thursday, January 18, 1990. pp. 1772-1776. 1 att.

B. References Cited in Federal Register Notice

1. The Nature and Extent of Lead Poisoning in children in the United States: A Report to Congress. Agency for Toxic Substances and Disease Registry. Public Health Service. U.S. Department of Health and Human Services. July, 1988. [See DWC-I.B.1]

C. Letters

1. Lead in Drinking Water Coolers

- a. April 12, 1989. From K. Michael Taylor, Robins, Preston, Beckett, Taylor & Gule, Co., To Michael B. Cook, ODW. From EBCO attorneys. Corrections to letter sent to Waxman January 21, 1988. Also correction to letter sent February 12, 1988. 2 pp.
- b. April 12, 1989. From Timothy Harker, The Harker Firm. To Michael B. Cook, ODW. Firm representing International Bottled Water Association (IBWA). IBWA request for correction of bottled water cooler list on April 10, 1989. Concerning manufacturers Sunroc and EBCO. Reference to letters sent to Waxman subcommittee on January 21, 1988 and February 12, 1988. 3 pp, 1 att. (For att., see DWC-I, C.9)
- c. April 18, 1989. From William F. Deal International Bottled Water Association, To IBWA Exec. Committee, Technical Chmn., Cooler Manufactures, Cooler Task Force. Concerns meeting between IBWA and EPA. 1 p.
- d. April 20, 1989. From Timothy L. Harker, The Harker Firm. To Michael B. Cook, ODW. From IBWA. Request for deletion of Sunroc bottled water coolers from April 10, 1989 notice. 3 pp.
- e. April 20, 1989. From Anthony Salamone, Sunroc Corporation to Peter Lassovszky, ODW. Concerns bottled water coolers manufactured by Sunroc. Reference to a January 21, 1988 submittal. 2pp.
- f. May 5, 1989. From Michael B. Cook, ODW. To Wade Miller, Exec. Dir., ASDWA. Concerning IBWA's objection of Sunroc and EBCO bottled water coolers being on April 10, 1989 notice. 2 pp.

- g. May 9, 1989. From Jeanne Briskin. To Drinking Water Branch Chiefs, Letter sent to Regions referring to above letter (May 5, 1989; Cook, Miller). Region I-10 1 pp.
- h. May 17, 1989. From Raja M. Sadiq, M.D., To Lead Docket. Letter from doctor concerning water cooler in office. 1 pp.
- i. May 24, 1989. From Christopher D. Hughes, Scotsman Industries. To Lead Docket. Representing Halsey-Taylor. Comments submitted in response to April 10, 1989 notice. Refers to lead in HAWs coolers. One deletion of a cooler. Reference also to information sent to EPA. September 1988. 5 pp.
- j. May 24, 1989. From Wayne Kjonaas, Purdue University. To Lead Docket. Concerns Halsey-Taylor drinking water coolers found on University. 1 pp.
- k. June 22, 1989. From Christopher Hughes, Scotsman Industries to Lead Docket, ODW. Supplement to the May 24, 1989 comments by Halsey Taylor in response to the April 10, 1989 Federal Register Notice. 1pp.
- l. July 17, 1989. From Michael Taylor, Robins, Preston, Beckett, Taylor and Gogle Co., L.P.A. To Michael Cook, ODW. Reference to May 9, 1989 correspondence with Michael Cook. Concerns models of EBCO coolers to be deleted from cooler list. Reference to information sent to Congressman Waxman. 2pp.
- m. August 29, 1989. From Bruce W. Kuebler, City of Los Angeles Dept. of Water & Power. To Lead Docket. Comment on lead guidance document. 1 pp.
- n. September 7, 1989. From Robert K. Hoshide Rockwell International. To Lead Docket. Refers to grammatical correction to lead guidance document. 1 pp.
- o. September 15, 1989. From Peter Winik, Latham & Watkins. To Jeralene B. Green, EPA/OGC. FOIA request. 1 pp. 1 att.
- p. October 2, 1989. From Peter L. Winik, Latham & Watkins. To Lead Docket. 2 pp, 3 att: June 22, 1989, From Christopher D. Hughes, Scotsman Industries, to Lead Docket, 1 pg; July 14, 1989, From Robert Sussman, et. al, Latham & Watkins. To Peter Cook, ODW. 8 pp; Sept. 22, 1989, Robert Sussman, et. al., Latham & Watkins. To Lead Docket. 4pp. 1 att. Enclosing above letters missing from Safe Drinking Water Docket dated June 22, July 14, September 22, 1989.

- q. October 24, 1989. From Michael Taylor, Robins, Preston, Beckett, Taylor and Gule Co., L.P.A. To Peter Lassovszky, ODW. Concerns telephone call October 23, 1989 in reference to deletion of certain EBCO models of coolers. 2pp.
 - r. October 26, 1989. From Michael Taylor, Robins, Preston, Beckett, Taylor and Gule Co., L.P.A. To Peter Lassovszky, ODW. Telefax. Requests deletion of certain models made by EBCO 1pp.
 - s. October 30, 1989. From Michael Taylor of Robin, Preston, Beckett, Taylor and Gule Co., L.P. A. To Peter Lassovszky, ODW. Refers to telephone conversation of October 30, 1989, regarding corrections of EBCO model numbered cited on previous correspondence dated October 26, 1989. 1 pp.
 - t. October 31, 1989. From Michael Taylor, Robins, Preston, Beckett, Taylor and Gule Col, L.P.A. To Peter Lassovszky, ODW. Telefax. Requests deletion of certain models of coolers by EBCO. 2pp
 - u. November 1, 1989. From Michael Taylor of Robins, Preston, Beckett, Taylor and Gule Co., L.P.A. To Peter Lassovszky, ODW. Concerning exported water coolers manufactured by EBCO. 1pp.
 - v. Undated. Memorandum from Kim Kepford, Office of Water. To Files, thru Jeanne Briskin, ODW. Refers to July 6, 1989 meeting between Halsey-Taylor and EPA. 2 pp.
2. Lead-Lined Drinking Water Coolers
- a. May 24, 1989. From Christopher Hughes, Scotsman Industries to Lead Docket, ODW. Comments made by Hasley Taylor concerning April 10, 1989 Federal Register Notice. 5pp.
 - b. June 6, 1989. From James K. Cleland, State of Michigan Dept. of Public Health. To Lead docket. Response to Lead in Schools drinking water book and seminar. 2 pp.
 - c. July 14, 1989. From Robert M. Sussman, Latham & Watkins. To Peter L. Cook, ODW. Reference to July 6, 1989 meeting between EPA and Scotsman Industries. Correction request to remove six models from cooler test. 8 pp, 1 att.
 - d. August 11, 1989. From Robert M. Sussman, et. al, Latham & Watkins. To Peter L. Cook, ODW. Concerning implementation of LCCA. 3 pp.

- e. August 24, 1989. From Robert M. Sussman, et.al, Latham & Watkins. To Peter L. Cook, ODW. Concerning information disseminated through the Texas school system. Attached is copy of the Texas Letter. 3 pp., 1 att.
- f. September 14, 1989. From Robert M. Sussman, et. al, Latham & Watkins. To Peter L. Cook, ODW. Refers to EPA letter on September 7, 1989 responding to legal letters sent to EPA August 11, 24, 1989. Attached is a letter from a school district August 22, 1989. 2 pp, 1 att.
- g. September 22, 1989. From Robert M. Sussman, et.al, Latham and Watkins to Lead Docket, ODW. Supplemental comments to the May 24, 1989 Halsey Taylor comments. Includes a lead testing protocol. 4pp. 1 att.
- h. October 2, 1989. From Peter L. Winik, Latham & Watkins. To Lead Docket. 2 pp, 3 att: June 22, 1989, From Christopher D. Hughes, Scotsman Industries, to Lead Docket, 1 pg.; July 14, 1989. From Robert Sussman, et. al., Latham & Watkins. To Peter Cook, ODW. 8 pp; Sept. 22, 1989, Robert Sussman, et. al, Latham & Watkins. To Lead Docket. Corrections to contents of Lead Docket. 4pp., 1 att.. Enclosing letters dated June 22, July 14, September 22, 1989.(Same as DWC-II, II.C.1.p.)
- i. November 21, 1989. From Robert M. Sussman, et. al., Latham & Watkins. To LaJuana S. Wilcher, Assist. Admin. for Water. Concerning cooler proposal. Request to remove 6 water coolers. 2 pp.
- j. Undated. Press Release. Contact: Robert Hoagland, Halsey-Taylor. Concerning Halsey-Taylor phase out of lead starting March 1979. 1 pp.

D. Test Results

1. Test Results at EPA Headquarters

- a. July 21, 1989. From Thomas J. Sorg, EPA/DWRD. To Peter Lassovszky, ODW. Water cooler lead data. 1 pp. 1 att.
- b. Undated. From John C. Chamberlian, OA. To All EPA Employees. Summary of Regional lead monitoring program. 1 pp and attachments.
- c. Undated. Headquarters Lead Monitoring Survey Fact Sheet. 2 pp and attachments.
- d. Undated. Water Cooler Sampling Study. Reg. VIII. Melanie Abell, Proj. Officer, 17 pp and attachments.

E. CPSC Investigations

1. CPSC Field Examinations

- a. October 14, 1988. From Carlos Perez, Director of CACA. To Central Region Center. Request for inspection of water cooler manufactures. 2 pp.
- b. October 31, 1988. CPSC Field Examination of Sunroc. For FOER by Ray Benson. Inspection of Sunroc coolers, attachments A1-A6. 12 pp.
- c. November 9, 1988. CPSC Field Examination of EBCO. For FOER by John R. Vece. Inspection of EBCO coolers, attachments A-N. 90 pp.
- d. November 9, 1988. CPSC Field Examination of Filtrine. For FOER by Bruce Schwartz. Inspection of Filtrine coolers. 34 pp.
- e. November 16, 1988. CPSC Field Examination of Halsey-Taylor. For FOER by John Vece. Examination of Halsey-Taylor Water Coolers. 4 pp.
- f. December 13, 1988. CPSC Field Examination of Elkay. For FOER by John Vece. Examination of Elkay coolers. 51 pp.
- g. November 15, 1988. CPSC Field Examination of Hobart Corporation. For FOER by John Vece Examination of drinking water coolers. 7 p.

2. Letters

- a. November 18, 1988. From Robin Munden, Household Manufacturing. To Ms. Catherine E. Downs, CPSC. 3 pp. Information on lead in specific models of Halsey-Taylor Water Coolers. Enclosed are exhibits A-I.
- b. December 2, 1988. From Robin Munden, Household Manufacturing. To Ms. Catherine Downs, CPSC. 1 pp. Composition of solders used on Halsey-Taylor Water Coolers.
- c. December 13, 1988. From Elkay Mtg., Ill. To Consumer Product Safety Commission. 5 pp. Response to CPSC questionnaire.

- F. Comments Received in Response to the Jan. 18, 1990 Federal Register Notice.
- a. March 5, 1990. From Michael Taylor General Counsel EBCO Manufacturing Company, Columbus, OH. To Peter Lassovszky U. S. EPA Office of Drinking Water, about lead in a part used in manufacturing "pressure bubbler water cooler". 1 page.
 - b. April 18, 1990. From Gerald Russel, Health and Safety Coordinator, Owego Apalachin Central School District, Owego, NY. To Peter Lassovszky U. S. EPA Office of Drinking Water, about lead in two models of Halsey Taylor Drinking Fountains, and the District's concern over EPA's not requiring replacement or refund for the said models.
 - c. May 7, 1990. From Barry Lussier, P. E. Chief Consultant Engineer of Hoyle, Tanner & Associates, Inc. (HTA), Bedford, NH. to Mr. Thomas Klien, Director of Marketing, Halsey Taylor Company, Vernon Hills, IL. about the drinking water coolers water samples test results in the HTA office building. 4 pages.