9444.1988(15)

PENTACHLOROPHENOL AS A WOOD PRESERVATIVE

AUG 29 1988

Hazards in the Environment Action League
HEAL-New Brighton
P.O. Box 12611
New Brighton, MN 55112

Dear Members of HEAL-New Brighton:

This is in response to your letter dated July 25, 1988, in which you expressed your concern about the use of pentachlorophenol as a wood preservative at two local sites in New Brighton, MN. More specifically, you urged the Agency to reclassify pentachlorophenol (PCP) as an acutely hazardous material and, if possible, to ban its use in the United States.

Wastes from the production of or manufacturing use of PCP (EPA hazardous waste F021) and discarded unused formulations containing PCP (EPA hazardous waste F027) are currently designated as acute hazardous wastes. (See 40 CFR 261.31). However, the Agency has received a petition to reclassify these two wastes as toxic wastes based on the results of a recent toxicological study. In April of 1988, the National Toxicology Program (CTP) released a draft report on the results of a study of the toxicity of purified and technical grade PCP, containing measured levels of HxCDD as well as other dioxin homologs in lower concentrations. (See enclosed citation). The Agency is in the process of reviewing these data and will respond to the rulemaking petition in the near future. This response will be a Federal Register notice and will request public comment. At that time, HEAL may submit its comments on EPA's decision.

Regarding the banning of PCP for use as a wood preservative, we have forwarded your letter to our Office of Pesticides and Toxic Substances (OPTS) for separate reply. The banning of chemicals is outside the purview of the Office of Solid Waste.

We look forward to your comments in the future.

Sincerely,
Original Document signed

Sylvia K. Lowrance, Director, Office of Solid Waste

CITATION

McConnell, E.E., DVM, Chemical Manager. NTP Technical Report on the Toxicology and Carcinogenisis Studies of Pentachlorophenol (CAS No. 87-86-5) in B6C3F1 Mice. Peer Review Draft. National Toxicology Program. Research Triangle Park, NC. April, 1988. NTP TR 349.