

ENVIRONMENTAL ISSUES

by
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Since my major experience has been with environmental/regulatory matters as related to pentachlorophenol, I will present some current information in this area. These issues fall in two broad categories: chlorodioxins in pentachlorophenol and proposed changes in the terms and conditions of registration of pentachlorophenol in the anticipated settlement of US EPA's Rebuttable Presumption Against Registration (RPAR).

The chlorodioxin issue, as related to pentachlorophenol, centers on the potential carcinogenicity of penta due to the presence of 1,2,3,6,7,8-hexachlorodibenzo-p-dioxin (1,2,3,6,7,8-Hx CDD) and 1,2,3,7,8,9-hexachlorodibenzo-p-dioxin (1,2,3,7,8,9-Hx CDD). Two studies, which have just recently been completed, have tended to negate the potential carcinogenic risk of penta.

The first study is entitled "Effects of Chemical Preservatives on the Health of Wood Treating Workers in Hawaii, 1981" by F.I. Gilbert, et al. This study was initiated to evaluate morbidity and mortality of workers occupationally exposed to wood treating chemicals used in Hawaii for the years 1960 to 1981.

The second study is entitled "An Assessment of the Experimental Evidence for Potential Carcinogenicity of Hexachlorodibenzo-p-dioxins" by R.A. Squire. This is an evaluation of the National Cancer Institute's carcinogenesis technical report stating that 1,2,3,6,7,8- and 1,2,3,7,8,9,-Hx CDD are oral carcinogens in rats. Dr. Squire has reviewed both the NCI's study protocol, and all the data and results generated in the study which included approximately 1,000 histopathological slides of livers taken from rats and mice fed the HCDD's.

Finally, regarding the proposed changes in the terms and conditions of registration of pentachlorophenol, rewording of labels for the following pentachlorophenol application would be discussed:

1. Pressure Treatment Uses for Pentachlorophenol
2. Groundline Treatment of Poles with Pentachlorophenol
3. Home and Farm Uses of Pentachlorophenol of Formulations 6% or Less and Formulations of 6% or Greater
4. Sapstain Uses of Sodium Pentachlorophenate
5. Millwork, Plywood and Particleboard Uses of Pentachlorophenol

Further, a Consumer Awareness Program and Consumer Information Sheet, which contains use site precautions and safe working practices for the three major wood preservatives, have been developed for use by the general public.