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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 25 1985

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Pentachlorophenol PD-4. Review of Document entitled "Arguments to Counter PD-2/3 of the EPA (Nonwood Applications)." Submitted by Rhone-Poulenc, Inc., Agrochemical Div. September 24, 1985.

FROM: David G. Van Ormer  
Toxicology Branch  
Hazard Evaluation Division (TS-769C)

*DVO*  
*23 Oct 85*

TO: Spencer L. Duffy  
PM Team No. 67  
Registration Division (TS-767C)

THRU: Edwin R. Budd, Section Head  
Section II, Toxicology Branch  
Hazard Evaluation Division (TS-769C)

*Budd*  
*10/24/85*  
*WAB*

The subject document contains assertions and opinions (without supporting data) itemized in the document as follows:

1. Statement of technological limitations to production of refined penta; unsupported assertions regarding the toxicity of HCDD isomers; and the suggestion to reduce the percentage of certain HCDD isomers, but with no data to support technological feasibility.
2. Questions regarding efficacy of alternatives; doubt regarding availability of adequate toxicity data on alternatives; assertion that the exposure scenario for penta has not included modern automated and mechanized procedures.
3. Assertion that EPA has not considered ecotoxicity hazards.
4. A request that the EPA cancellation of certain nonwood applications be replaced by regulated use. This request is based on the assertions of (a) the limited number of

people exposed, (b) the expertise of the industry in controlling the hazard with automatic apparatus, and (c) the use of solutions rather than powders. The statement also refers to the alleged lack of proper economic/risk consideration, and the lack of adequate toxicity data on alternatives (particularly for ecotoxicity and oncogenicity). Specifically, it is stated that sodium trichlorophenol is not a proper replacement for sodium pentachlorophenol in joint and adhesive applications. In addition, the ecotoxicity of specific alternatives is questioned.

Of the above submitted arguments, the only item which falls in the purview of Toxicology Branch is the relative toxicity of HCDD isomers. Toxicology Branch, however, cannot judge either toxicity or relative hazard in the absence of toxicity data or in the absence of a revised exposure assessment. Toxicology Branch, furthermore, has not been assigned the responsibility for making the final decision regarding adequacy of available toxicity data for alternatives to Special Review chemicals.

Toxicology Branch would welcome the receipt of either toxicity data on HCDD isomers or of additional toxicity data on penta alternatives.