

Registration Review Decision for Pentachlorophenol

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SFIREG JOINT WORKING COMMITTEE MEETING

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Registration Review Decision: Executive Summary

OPP proposed cancellation of the wood preservative uses of pentachlorophenol in its March 2021 [Proposed Interim Registration Review Decision](#).

Pentachlorophenol is proposed to be phased-out, with registrations cancelled within 2 years of the finalized decision and 3 years for use of existing stock (5 years total).

Public comment period closed on May 19, 2021, and OPP is considering the comments in developing the Interim Decision.

Pentachlorophenol Pesticide Registrations

- Restricted-use pesticide
- Formulated as a “heavy-duty” wood preservative
- Used in the pressure or thermal treatment of wood intended for exterior use:
 - Lumber, timber, posts, poles, and other wood members
 - Major preservative in preservation of utility poles and cross arms



Pentachlorophenol DRA: Occupational Handler Assessment

- Last assessed in 2008 Reregistration Eligibility Decision (RED)
- Post-RED mitigation included:
 - Automated chamber control processes
 - Engineering controls, mechanical loading/removal
 - Post-treatment ventilation
- Observational occupational exposure study evaluated effectiveness of post-RED mitigation
- DRA identified significant remaining human health cancer and non-cancer risks of concern for occupational handlers (workers) based on long-term dermal and inhalation exposures
 - Cancer risk of 1 in 1,000
- Conclusion: high risks outweigh benefits



Rationale for Proposed Cancellation of Pentachlorophenol

1. Pentachlorophenol Draft Risk Assessment (2020) found risks of concern for occupational handlers, including cancer risk of 1 in 1,000.

2. Recent developments of viable, safer alternatives such as: copper naphthenate and 4,5-Dichloro-2-N-Octyl-4-Isothiazolin-3-One (DCOI).

3. There are other, well-established alternatives such as creosote and chromated arsenicals and dichromic acid (CCA).

4. End of 2021: Sole producer of pentachlorophenol, KMG-Bernuth, is closing its facilities in Mexico and United States that manufacture pentachlorophenol.

5. 2012: Pentachlorophenol was banned by ~150 countries in the Stockholm Convention on Persistent Organic Pollutants.

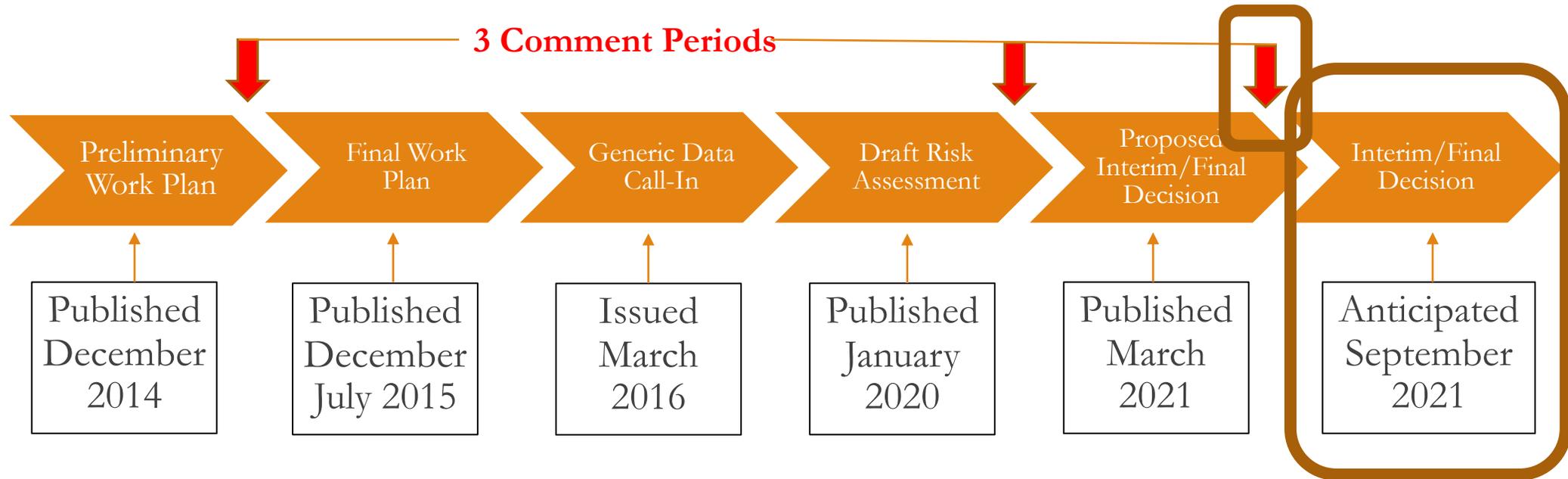
6. July 2020: Health Canada's Pesticide Management Regulatory Authority proposed cancellation of pentachlorophenol.

Proposed Phase-Out of Pentachlorophenol

- Proposed Interim Decision proposes phase-out over 5 years after the publication of the Interim Decision:
 - 2 years: registrants submit voluntary cancellation request
 - 3 years: allow use of existing stocks
- Proposed Interim Decision does not propose:
 - immediate cancellation of pentachlorophenol
 - replacement of existing poles treated with pentachlorophenol
- Proposal will be finalized in the Interim Decision



Registration Review Next Steps



Public comment period on pentachlorophenol Proposed Interim Decision closed May 19, 2021.

Interim Decision is anticipated to be completed in September 2021.

Public Comments Received on the Proposed Interim Decision for Pentachlorophenol

- Public comment period, including a 15-day extension, closed on May 19, 2021.
- **Comments received from 14 sources:**
 - Members of the general public
 - Local elected officials in New York
 - The sole producer of pentachlorophenol, KMG-Bernuth
 - Companies that hold product registrations containing pentachlorophenol
 - Treaters that use pentachlorophenol
 - Trade organizations representing wood treaters
 - Wood Preservation Canada
 - Treated Wood Council
 - Western Wood Preservers Institute
 - Trade organizations representing utilities
 - North American Wood Pole Council
 - Utility Solid Waste Activity Group
 - U.S. Department of Agriculture's Forest Service
 - Non-governmental organizations: Beyond Pesticides

Pentachlorophenol PID: Public Comment Topics

- Reactions to proposal for cancellation of pentachlorophenol products
 - **Support:**
 - Decision to cancel pentachlorophenol registrations is overdue
 - EPA is justified in cancellation based on risk alone
 - Cancellation aligns U.S. with international trend in the Stockholm Convention, including Canada's recent proposal to cancel pentachlorophenol registrations
 - **Opposition:**
 - Cancellation not based on risk alone; continued production of pentachlorophenol should not be a consideration in EPA's decision
 - Pentachlorophenol provides critical benefits
 - Cancellation of pentachlorophenol would be disruptive to the utility market in the U.S.
- Discussion of alternatives to pentachlorophenol:
 - Commenters provided information on alternative chemistries (copper naphthenate, DCOI, creosote, chromated arsenicals, etc)
 - Non-chemical poles: fiber reinforced polymer (FRP), cement, steel, etc.
 - Concern that established alternatives such as chromated arsenicals and creosote present their own environmental and human health impacts

Pentachlorophenol PID: Public Comment Topics (continued)

- 5-year phase out period:
 - Phase out is adequate as proposed
 - Too long and should be shortened
 - Too short and should be lengthened
 - Request to allow for use of existing stocks until depletion
- Comments on Pentachlorophenol Draft Risk Assessment:
 - EPA did not assess exposure resulting from pentachlorophenol-treated utility poles in communities
 - Consideration of pentachloroanisole as a degradate
 - DRA is missing Endocrine Disruptors Screening Program and Endangered Species Act assessments
- Request for additional clarity:
 - How to approach wood already in the treatment/installation pipeline during and after phase-out
 - Questions on if pentachlorophenol-treated poles will need to be replaced with other treated wood
 - Residual pentachlorophenol present in treating systems and tanks after switching to new preservative system

Questions?

