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Writer's Direct Access
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By Electronic Submission at lunn@niehs.nih.gov

Dr. Ruth M. Lunn
Director, Office of the Report on Carcinogens
National Toxicology Program
NIEHS/NIH
P.O. Box 12233
MD K2-14
Research Triangle Park, NC 27709

Re: NTP Report on Carcinogens webinar on PCP

Dear Dr. Lunn:

On behalf of the Pentachlorophenol Task Force we are responding to the presentation made by Kevin Dunn, "Overview of Occupational Exposures to Pentachlorophenol" presented during NTP Report on Carcinogens webinar on PCP on April 10, 2013. In his presentation Dr. Dunn quoted statistics from the 2007 US Census Economic Report for NAICS 321114 Wood Preservation to illustrate the number of workers exposed to pentachlorophenol. The report does list 13,389 workers in the wood preservation sector as Mr. Dunn indicated in his report, however, not all of these workers are engaged in production, nor are all working at establishments that use pentachlorophenol. According to the same report, there are 10,448 production worker (average during the year) working at 513 wood preservation establishments. Based on information from the manufacturer of pentachlorophenol about customers, as well as a review of the Toxic Release Inventory that lists facilities reporting releases of pentachlorophenol, there are 31 of these 513 establishments that use pentachlorophenol for wood treatment. If all facilities had the same number of workers, this would translate into 631 production workers in these 31 establishments that use pentachlorophenol for wood treatment or 20 per establishment.

The Pentachlorophenol Task Force has recently conducted a survey of those establishments that use pentachlorophenol for wood treatment in order to prepare for an applicator exposure study that will be conducted in the coming months. The results from the survey respondents show an even smaller number of production workers engaged in handling pentachlorophenol. There were 169 exposed workers reported by the 19 respondents. Adjusting to 31 establishments, there would be 276 workers exposed. Since these plants generally treat

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wood with other chemicals besides pentachlorophenol, the difference between this and the average number per establishment is understandable.

In conclusion, we note that the number of workers exposed to pentachlorophenol is much lower than the 13,389 indicated in this presentation. Also, the exposure levels will be less than in previous years because of the additional engineering controls required by the EPA reregistration decision. Please contact us if you have any further questions.

Sincerely,

[Redacted]

Herbert Estreicher

Counsel to the Pentachlorophenol Task Force

cc: Roger Jackson, KMG-Bernuth
Diana Graham, Keller and Heckman