June 2, 1997

The Honorable Carol Browner
Administrator
U.S. Environmental Protection Agency
401 M. Street, SW
Washington, DC 20460

Dear Administrator Browner:

We are writing to bring to your attention a public health problem related to continued human and environmental exposure to wood preservatives. We believe the problem has an immediate remedy and therefore deserves swift agency action. We urge the agency to begin immediately an assessment of the various uses of treated wood and analyze the availability of alternatives that could replace the use of these very hazardous materials.

From a clinical and public health perspective, we are concerned about the level of wood preservatives, particularly pentachlorophenol, in body fluids and tissues of humans in the general population. These levels are cause for public health concern, given the nature of the chemicals and their association with cancer, birth defects, disruption of the endocrine system and other health effects. We address our concern to the range of exposure points for people and the environment, from the chemicals' manufacture to its use and disposal.

In response to *Poison Poles: Their Toxic Trail and the Safer Alternatives*, released by the National Coalition Against the Misuse of Pesticides (NCAMP) in February, an EPA official stated in the press, "We did a very extensive risk assessment of wood preservatives in the mid-80's. . . And we finally determined that the benefits outweighed the risks." This statement is based on an EPA review over 12 years ago which did not consider the actual presence of pentachlorophenol in human fluids when it considered the risks associated with continued use. Moreover, according to the NCAMP report, alternative pole materials, such as recycled steel, are now cheaper and more plentiful than 12 years ago.

As far back as the early 1980's, the National Health and Nutrition Examination Survey (NHANES) II found pentachlorophenol in 79% of the general U.S. population. In a 1989 study of Arkansas children, 100% tested with a median penta concentration of 14 ppb, which is higher than any of the

other study analytes. A 1994 Canadian study, employing a more sensitive detection limit found detectable levels of penta in all 87 samples evaluated. (Thompson, et al., Preliminary Results of a Survey of Pentachlorophenol Levels in Human Urine, p. 276). The authors conclude, "The high rate of incidence of detectable quantities of PCP in human urine as reported in this and previous studies confirms the widespread existence of PCP throughout the environment." (Thompson, p. 279). While health effects have not been directly attributed to these levels, there is concern about endocrine disruption at extremely low levels of exposure contributing to biological changes, infertility and cancer.

A Canadian study comparing organochlorine residues in human adipose tissue autopsy samples in two Provinces at about the same time as EPA's review of wood preservatives found a frequency of residue occurrence ranging between 88 and 100 percent of male and female autopsies.

Where possible, we should seek to remove or reduce this potential public health threat, especially given the potential impact of these chemicals on children and developing fetuses. We believe strongly in the precautionary principle and prevention.

Part of our concern stems from the fact that wood preservatives constitute the largest group of pesticides used in the United States by volume, accounting for over one-third of the two billion pounds of pesticides used annually. It appears that EPA is doing nothing to effect a reduction in the introduction of these toxic materials into the environment. To the extent that alternatives are available, they should be used to stem the continued introduction of wood preservatives into the environment. This is the prudent public health path to take.

In its earlier review, while EPA recognized significant risks, the agency determined that widespread uses of wood preservatives would remain on the market, "Due to the non-substitutability of the wood preservative compounds and the lack of acceptable non-wood or other chemical alternatives for many use situations. . ." (EPA. Wood Preservative Position Document 2/3. Executive Summary, p.3). The agency determined that, "[T]he economic impact which would result from an across-the-board cancellation would be immense." (Ibid.). That was then.

The endocrine disruption effects of pentachlorophenol, which contains dioxin, furan and hexachlorobenzene contaminants, make it especially important for the agency to act to remove uses where possible. We believe that the agency should, as quickly as possible, seek to curtail the introduction

of these chlorinated hydrocarbons into the environment, its land, air and water.

We appreciate your attention to this matter in light of continuing concerns about the toxic body burden with chlorinated hydrocarbons, as well as their environmental background levels, and the need to reduce these levels or, at the least, not add to it. The agency appears to have an opportunity to remove significant exposure resulting from treated utility pole manufacture, use and disposal and begin the process of finding alternatives for the other wood preservative uses as soon as possible.

Thank you for your attention to this matter. We look forward to your reply.

Sincerely,

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