

Caswell 641

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: October 7, 1977

SUBJECT: Pentachlorophenol in various formulations EPA Reg. #2337-12
EPA Reg. #2337-40, EPA Reg. #9639-6, EPA Reg. #9639-14
Product Manager: John H. Lee (22)

FROM: William Dykstra, Ph.D.
TOX/RD

TO: John H. Lee, PM #22

Type of Action: Information in response to letter.

Recommendations: The letter by Carol Cummins (California Dept. of Food and Agriculture) warrants serious consideration in view of the lack of acute, subacute and chronic inhalation studies needed to evaluate the human toxicological hazards associated with the proposed use and exposure patterns of these formulations.

The registrants should be required to submit these inhalation studies in support of the current labels and thereafter, revisions of the labels should be implemented in light of the new information. The current product labels are inconsistently labelled: Signal words- DANGER and Caution appear on the same label (E.P.A. Reg. #2337-12, E.P.A. Reg. #2337-40). Also a label statement informing the user not to treat wood intended for interior use should be added to each label, since information in the open literature suggests exposure from this use has occurred.

Note to P. M. #22

1. Pentachlorophenol is an RPAR chemical because of "dioxin". However, inhalation studies reported in the open literature suggest an increased toxicity from PCP by inhalation in comparison to oral toxicity and a significantly different fate of the compound depending on the type of exposure or "route of administration". The inhalation LC₅₀ studies may trigger an RPAR criterion.