

From: [Estreicher, Herb](#)
To: [P65Public Comments](#)
Subject: NOIL Pentachlorophenol
Date: Monday, November 30, 2015 10:47:34 AM
Attachments: [NOIL_pentachlorophenol.pdf](#)

Ms. Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment
1001 I Street
Sacramento, California 95814

Re: Notice of Intent to List Pentachlorophenol and by-products of its synthesis (complex mixture)

Dear Ms. Esther Barajas-Ochoa:

I am submitting the attached comments on behalf of the Pentachlorophenol Task Force, which represents the U.S. and Canadian registrant of the wood preservative pentachlorophenol.

Herb Estreicher, J.D., Ph.D.

Partner

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PENTACHLOROPHENOL TASK FORCE

c/o Roger C. Jackson
KMG Chemicals, Inc.
9555 West Sam Houston Parkway South
Suite 600
Houston, TX 77099

By Electronic Transmission to P65Public.Comments@oehha.ca.gov

June 30, 2015

Ms. Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment
1001 I Street
Sacramento, California 95814

Re: Notice of Intent to List Pentachlorophenol and by-products of its synthesis (complex mixture)

Dear Ms. Esther Barajas-Ochoa:

I am writing on behalf of the Pentachlorophenol Task Force, which represents the U.S. and Canadian registrant of the wood preservative pentachlorophenol. We understand OEHHA is considering whether to list "Pentachlorophenol and by-products of its synthesis (complex mixture)" under Proposition 65 on the basis of the parallel NTP listing in the 13th Report on Carcinogens.

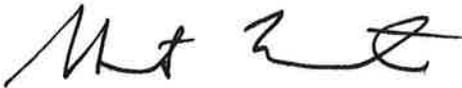
As OEHHA is no doubt aware pentachlorophenol is already listed under Proposition 65 as a chemical known to the State of California to cause cancer. Pentachlorophenol and by-products of its synthesis (complex mixture) is nothing more than the form of pentachlorophenol (technical grade) that is registered with the U.S. EPA as a wood preservative and is the form of pentachlorophenol to which persons in the State of California would potentially be exposed. There is no other article of commerce that contains pentachlorophenol.

Moreover, all of the components (microcontaminants) of "Pentachlorophenol and by-products of its synthesis (complex mixture)" that are associated with carcinogenicity, principally Polychlorinated dibenzo-p-dioxins, Polychlorinated dibenzofurans, and Hexachlorobenzene, are already listed as carcinogens under Proposition 65.

Ms. Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment
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Accordingly, we submit that a separate listing for Pentachlorophenol and by-products of its synthesis (complex mixture) would be duplicative of existing listings and would be unnecessary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Estreicher', written in a cursive style.

Herbert Estreicher

Counsel to the Pentachlorophenol Task Force