
Comments Received from PTF

February 26, 1999

Via Facsimile & E-mail

Mr. Frank Anscombe
U.S. Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, IL 60604

RE: Octachlorostyrene Sources

Dear Mr. Anscombe:

I am writing on behalf of the Pentachlorophenol Task Force (“PTF”) to comment on the draft report entitled “Great Lakes Binational Toxics Strategy Octachlorostyrene (OCS) Report: A Review of Potential Sources” (hereinafter “OCS Report”) (dated December 22, 1998). The PTF has been organized to support the continued registration of pentachlorophenol (“penta”) in the U.S., Canada and elsewhere. It is comprised of the two U.S. registrants of penta – Vulcan Chemicals, a business unit of Vulcan Materials Company, and KMG-Bernuth Inc. (“KMG”). As part of its charter, the PTF is committed to ensuring that regulatory decision implicating penta are based on sound science and reflect current, up-to-date data.

1 Page 50 of the draft OCS Report states that the production of penta is suspected of forming octachlorostyrene (“OCS”) as a byproduct in trace amounts. A citation to Kirk-Othmer 1996 is given in support of that statement. The authors of the OCS Report attempt to draw a parallel between PCDD/PCDF formation during penta manufacture and OCS formation. Indeed, Table 4 of the draft report goes so far as to suggest that the amount of penta used annually to treat utility poles may contain up to 16,325,000 grams of OCS. Based on roughly the 17 million pounds of penta being produced annually by PTF member companies, the figure in the Table would translate to an OCS content in penta of approximately 0.4 percent.

2 The PTF members have no information confirming the presence of OCS in penta, as is suggested in the OCS Report. Nonetheless, we fail to see the scientific rationale for drawing a connection between the formation of trace quantities of certain higher chlorinated PCDDs/PCDFs during penta manufacture with any possible OCS formation. We have examined the Kirk-Othmer

reference and fail to see how that supports the contentions in the OCS Report.

Moreover, the suggestion that penta contains up to 0.4 percent OCS is plainly wrong. PTF member Vulcan has analyzed its penta for the presence of any contaminants at levels above 0.1 percent and in those analyses OCS has not been identified.

If you have any questions, do not hesitate to call me.

Sincerely,

John Wilkinson