

(Page numbers refer to document [Pentachlorophenol TR_IASD Draft_track changes_ 7-29-10.pdf])

- 1) - Page 3 ¶2: It is noted use of pentachlorophenol by the general public was "restricted" in 1984 but this implies that perhaps still limited use by the public occurs. Please add a sentence here that states pentachlorophenol is no longer available to the general public and is only available to certified applicators.
- 2) - Often IRIS documents have text in the Physical and Chemical Properties chapter that describes routes of exposure and environmental fate and transport mechanisms for the chemical under review. In the pentachlorophenol document, there is no discussion of these topics. It would be beneficial to add a paragraph or two that describes how people may be exposed to pentachlorophenol and how the compound behaves in the environment.
- 3) - Response to Comments on Charge Question 2, page 217: It is noted one of the reviewers identified a new NIOSH epidemiological study that was said to provide evidence for an association between exposure to PCP and a risk of non-Hodgkin's lymphoma and that the study is currently unpublished (Ruder et al., unpublished). However, the reviewer noted that a conference abstract is available and notes the authors are cited as Ruder and Sweeney, 2009 [not Ruder et al. as EPA indicates]. Please clarify the text to better reflect the reviewer's comment.
- 4) - Page 191: In the discussion of the few studies that have examined the effects of the lower exposures that occurred in occupational settings or through residential or environmental sources, the study "Exposure to Farm Crops, Livestock, and Farm Tasks and Risk of Glioma-The Upper Midwest Health Study " by Ruder et al. 2009¹ might be relevant and as such be mentioned here (the article states: "The use of pentachlorophenol as a wood preservative was associated with a significantly increased risk in analyses excluding proxy respondents (OR $\frac{1}{4}$ 4.55, 95% CI: 1.14, 18.1), but the number of users was small (6 cases, 11 controls).")

¹ *American Journal of Epidemiology* 2009 169(12):1479-1491