

March 25, 2019

Senator Michael Dembrow,
Chair Senate Environment & Natural Resources Committee
senr.exhibits@oregonlegislature.gov

RE: 2019 Oregon Legislative Session – SB 853

Dear Chairman Dembrow:

Permapost Products Company is a family-owned, woman operated, Oregon legacy small business. We are a trade sector business providing fabrication and preservative treatment of lumber and engineered forest products for 62 years. We pride ourselves in the preservative treatment of high-end architectural lumber and engineered wood products for our customers in Oregon, across the US, Hawaii, Alaska, the South Pacific, South America, and China. We are a large producer of trail bridges for the US Forest Service and park equipment for state and local governments.

It has come to our attention that SB 853 has been introduced seeking to list as “restricted use” certain pesticides known as “Neonicotinoids”. Neonicotinoids are known to affect pollinator insects such as bees when sprayed in an agricultural setting. One of the sub-insecticides of neonicotinoids listed in the bill is “Imidacloprid”.

Imidacloprid is a pesticide that is standardized under the American Wood Preservers Association (AWPA) for above ground protection of wood products such as lumber, plywood, deck boards and fencing.

Imidacloprid is a component in one of our wood preservatives, Klear-Gard 25 with Tru-Core Technology™ (“Klear-Gard 25”). Klear-Gard 25 was introduced approximately three years ago although the Imidacloprid component has been used in wood treating for many years. Klear-Gard 25 treated wood is approved by the International Building Code Commission (ICC-ESR 3834) for use in construction applications.

Klear-Gard 25 is a new generation preservative. It is water carried and molecularly transfers all the way through the wood product thus protecting the wood even if it is cut or cracked. It contains no metals, no colorants, and has no more VOCs than the untreated wood. Permapost treats picnic table parts, trail bridge deck and handrails, interior framing, refrigerated rail car parts, and glulam beams to name a few applications.

Lumber and other wood products are treated in a closed pressure vessel by state licensed certified applicators. Permapost is regulated by the Oregon Department of Agriculture (Certified Applicator testing and licensing) and the Oregon Department of Environmental Quality (Air Quality, NPDES, and RCRA permits). We treat per the AWPA standards and report chemicals usage and inventory annually to the Oregon State Fire Marshall. All the components used in Klear-Gard 25 wood preservative are

registered with the EPA and regulated by the Federal Insecticide Fungicide Rodenticide Act (FIFRA).

In economic terms, products treated with Klear-Gard 25 are about 15% of our sales revenues and growing. The Klear-Gard 25 treatment service we provide to one of our wholesale customers, has contributed to more than \$1,000,000 in sales revenues to his company. Also Klear-Gard 25 is now government specified in certain applications replacing higher VOC emitting petroleum-based preservatives.

We understand there are concerns with Neonicotinoids pesticides. There may be some types of applications, which should be regulated more or removed from the EPA approved label. However, lumber products are treated with pesticides to protect the wood and extend the life of a renewable resource. The pesticide is contained in the wood and does not affect pollinators. The wording of the bill does not consider a building product exemption nor the pesticide application processes (i.e., pressure treatment).

Sincerely,



Jayne Bond
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