

March 29, 2019

The Honorable Ken Helm
Chair, House Energy & Environment Committee
900 Court St NE, H-490,
Salem, OR 97301
hee.exhibits@oregonlegislature.gov

RE: 2019 Oregon Legislative Session - HB 2619

Dear Representative Helm

Permapost 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 HB 2619 has been introduced for the 2019 session. The bill, sponsored by Rep Marty Wilde, seeks to blanket ban for sale, use, and purchase 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 was introduced approximately three years ago although the Imidacloprid component has been used in wood treating for many years. Klear-Gard 25 with Tru-Core Technology wood preservative is also approved by the International Building Code Commission (ICC-ESR 3834) for use in construction application wood products.

Klear-Gard 25 with Tru-Core Technology 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, & 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 with Tru-Core Technology 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 with Tru-Core Technology are about 15% of our sales revenues and growing. The Klear-Gard 25 with Tru-Core Technology 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 with Tru-Core Technology is now government specified in certain applications replacing higher VOC emitting petroleum-based preservatives.

We understand there are concerns with Neonicotinoid pesticides. There may be some types of applications, which should be regulated more or removed from the 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. The wording of the bill does not consider a building product exemption nor the pesticide application processes (ie, pressure treatment). It is a blanket prohibition without reason or science.

I am available to discuss with you this bill and its negative effect on my business. Please contact me at 503-648-4156 or email at jayne@permapost.com. Thank you for your attention to this matter.

Warm Regards,



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