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**ENVIRONMENTAL PROTECTION  
AGENCY**

**2,4,5-TRICHLOROPHENOXYACETIC ACID**  
**Intent To Hold Hearing**

Please take notice that pursuant to the authority vested in me by section 6(b) (2) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended, I hereby issue a notice of my intention to hold a hearing on all registered uses of 2,4,5-Trichlorophenoxyacetic Acid (2,4,5-T) other than on the use for rice which was cancelled on May 1, 1970 (USDA-PRD 70-13), as reaffirmed by Order of August 6, 1971 (36 FR 1477, Aug. 11, 1971). It is my intention that the public hearing concerning the use on rice, (I. F. & R. Consolidated Docket Nos. 42, 44, 45 & 48) be consolidated with the hearing I have called today for all other uses and that all hearings commence in April, 1974. The start of the hearing is being delayed until then to permit the Agency to complete an environmental and human monitoring project on the presence of the tetrachlorodioxin impurity found in 2,4,5-T and the extent to which the dioxin may adversely affect human and animal health.

Please take further notice that any person wishing to become a party to this hearing called by me today on all other uses of 2,4,5-T shall file a response to the accompanying statement of issues, published herewith, with the Hearing Clerk, Environmental Protection Agency, Waterside Mall, Washington, D.C. 20460, on or before August 23, 1973.

Done this 19th day of July 1973.

**DAVID D. DOMINICK,**  
*Assistant Administrator for  
Hazardous Materials Control.*  
[FR Doc.73-16189 Filed 7-23-73;8:45 am]

**2,4,5-TRICHLOROPHENOXYACETIC ACID**  
**Statement of Issues**

Pursuant to the accompanying notice of intent to hold a hearing, it is hereby ordered that the following issues be addressed by such hearing together with any other issues which the Administrative Law Judge deems relevant, namely:

I. Whether 2,4,5-Trichlorophenoxyacetic Acid (2,4,5-T) products presently registered, or other material submitted in support of these registrations, complies with the provisions of the Federal Insecticide, Fungicide and Rodenticide Act, as amended; and

II. Whether 2,4,5-T will perform its intended function without unreasonable adverse effects on the environment.

III. Whether, when used in accordance with widespread and commonly recognized practice, 2,4,5-T generally causes unreasonable adverse effects on the environment, as defined by the Federal Insecticide, Fungicide and Rodenticide Act, as amended.

IV. Whether the registrations of 2,4,5-T should be cancelled or its classification changed.

V. The answers to these issues should relate to the following subsidiary questions, as well as to the ten issues delineated in the 2,4,5-T Orders of the Administrator of November 4, 1971 and April 13, 1972; (I. F. & R. Docket No. 42 and No. 44) and to such additional questions as the Administrative Law Judge finds relevant, namely:

A. The health hazards to man and to other animals which may be caused by 2,4,5-T and/or its extremely toxic contaminant, 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD), with emphasis on the following:

1. Is 2,4,5-T or TCDD a teratogen?
2. Does 2,4,5-T or TCDD induce other adverse reproductive effects?
3. Is 2,4,5-T or TCDD a mutagen?
4. Is 2,4,5-T or TCDD a carcinogen?
5. Can exposure to 2,4,5-T or TCDD induce sub-lethal chronic health effects?
6. Can chronic, low-level exposure to 2,4,5-T and/or TCDD cause delayed lethality?

B. The extent of the health risk for man and other animals posed by 2,4,5-T and TCDD, with emphasis on the following conditions:

1. Can additional TCDD be generated in the environment by the thermal stress of 2,4,5-T or its metabolites?

2. Can 2,4,5-T or TCDD persist and bioaccumulate in the environment?

3. What are the avenues of human and animal exposure to 2,4,5-T and TCDD? For example, can aerial drift or water transport of 2,4,5-T or TCDD cause movement of these compounds away from the site of application?

4. Are 2,4,5-T or TCDD residues being stored and accumulated in the human food supply and in human and animal tissue, including humans and wildlife directly exposed to 2,4,5-T?

5. Are other dioxins and similar contaminants, besides TCDD, present in 2,4,5-T and, if so, what risks to health do they constitute?

6. What are other environmental sources of dioxins particularly TCDD, and do these sources enhance the total dioxin body burden and exacerbate the health risks raised by 2,4,5-T and related TCDD?

7. What are the current levels of dioxins in registered 2,4,5-T products and in technical material used to formulate these products?

8. Do the current methods of manufacture of 2,4,5-T provide for consistently low levels of dioxins in the final technical product and what are the quality control measures used to minimize dioxin levels?

C. The necessity for the continuation of the registered uses of 2,4,5-T, with emphasis on the following:

1. What are the pests which each registered use is intended to control and the degree of control achieved by each use?

2. What is the cost, timing, and rate of application of 2,4,5-T for each use?

3. What alternative controls exist for each registered use and what is the cost and effectiveness of each alternative?

4. Do alternative pesticide products cause adverse environmental effects?

5. What are the economic implications of these alternatives, including that of no control?

Done this 19th day of July 1973.

**DAVID D. DOMINICK,**  
*Assistant Administrator for  
Hazardous Materials Control.*  
[FR Doc 73-15190 Filed 7-23-73;8:45 am]

[I. F. & R. Docket No. 295]

1. A contaminant of 2,4,5-T,-- tetrachlorodibenzoparadioxin (TCDD, or dioxin) -- is one of the most teratogenic chemicals known. The registrants have not established that 1 part per million of this contaminant -- or even 0.1 ppm -- in 2,4,5-T does not pose a danger to the public health and safety.

2. There is a substantial possibility that even "pure" 2,4,5-T is itself a hazard to man and the environment.

3. The dose-response curves for 2,4,5-T and dioxin have not been determined, and the possibility of "no effect" levels for these chemicals is only a matter of conjecture at this time.

4. As with another well-known teratogen, thalidomide, the possibility exists that dioxin may be many times more potent in humans than in test animals (thalidomide was 60 times more dangerous to humans than to mice, and 700 times more dangerous than to hamsters; the usual margin of safety for humans is set at one-tenth the teratogenic level in test animals).

5. The registrants have not established that the dioxin and 2,4,5-T do not accumulate in body tissues. If one or both does accumulate, even small doses could build up to dangerous levels within man and animals, and possibly in the food chain as well.

6. The question of whether there are other sources of dioxin in the environment has not been fully explored. Such other sources, when added to the amount of dioxin from 2,4,5-T, could result in a substantial total body burden for certain segments of the population.

7. The registrants have not established that there is no danger from dioxins other than TCDD, such as the hexa- and heptadioxin isomers, which also can be present in 2,4,5-T, and which are known to be teratogenic.

8. There is evidence that the polychlorophenols in 2,4,5-T may decompose into dioxin when exposed to high temperatures, such as might occur with incineration or even in the cooking of food.

9. Studies of medical records in Vietnam hospitals and clinics below the district capital level suggest a correlation between the spraying of 2,4,5-T defoliant and the incidence of birth defects.

10. The registrants have not established the need for 2,4,5-T in light of the above-mentioned risks. Benefits from 2,4,5-T should be determined at a public hearing, but tentative studies by this agency have shown little necessity for those uses of 2,4,5-T which are now at issue.