

**Silvex Banned Because of TCDD
Feb 1979**

This is the Navys water supply. It also supplies the fleet that ports on Guam. It is surrounded by the Santa Rita Naval Base. This base is where most of the munitions were stored including, nuclear, chemical and biological weapons. The contaminated munitions from Operation Crossroads were stored there as well. At least 2 of the veterans I am in contact with used AO on this base in the 60s.

Fena Lake is the source of the water. All bases contaminate the environment around them and Santa Rita was no different. The pesticides had to be used in and around this lake. That's the way the military did things.

Munitions depots like Santa Rita are among the most contaminated the military has. They just add a few contaminants the other bases may not have, such as explosives and radioactive wastes.

In recent years chemicals such as pesticides create dioxin in the water systems of ships, the codistillation process. The water in Fena would have had many of these pesticides. Pesticides were used on a regular basis for routine maintenace on all military bases in the pacific. Silvex was approved for distribution in and around water per the U. S. military. (See silvex folder) Below is the cancellation notice for Silvex(2,4,5,TP)

I have used tif and jeg format.

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**Pesticide Active Ingredient
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**Herbicides, Growth Regulators
and Desiccant**

**fatty alcohol to monuron
(Telvar)**

**fenoprop
(Silvex)**

**fenoprop (Silvex) Usage
Suspension 2/79**

fenoprop (Silvex) Usage Suspension 2/79

**DECISION AND EMERGENCY ORDER SUSPENDING REGISTRATIONS FOR CERTAIN
USES
OF 2-(2,4,5-TRICHLQROPHENOXY) PROPIONIC ACID (SILVEX)**

NOTICE OF INTENT TO CANCEL CERTAIN REGISTRATIONS OF PESTICIDE PRODUCTS CONTAINING SILVEX

SUSPENSION ORDER FOR SILVEX

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D. C. 20460

Office of Pesticide Programs
February 28, 1979

Decision and Emergency Order Suspending Registrations for Certain Uses of 2-(2,4,5-Trichlorophenoxy) Propionic Acid (Silvex)

I. INTRODUCTION

During the past two years, the Agency has been gathering information about the closely related phenoxy herbicides, 2-(2,4,5-trichlorophenoxy) propionic acid (silvex) and 2,4,5-trichlorophenoxy acetic acid (2,4,5-T), as part of its Rebuttable Presumption Against Registration (RPAR) process in order to decide whether the registration of this pesticide should be continued. This review was prompted by studies showing that silvex, 2,4,5-T, and/or their dioxin contaminant, 2,3,7,8-tetrachlordibenzo-p-dioxin (TCDD) [Current methods for manufacturing silvex produce TCDD as a by-product of the manufacturing process.

Although silvex manufacturers attempt to remove this contaminant, TCDD cannot be completely removed. An EPA contract laboratory has measured the TCDD content in 8 recently produced commercial samples of technical grade silvex from two different manufacturers. The contractor reported that the TCDD content in these samples ranged from 0.012 to 0.024 ppm TCDD (limit of detection: 0.01 ppm). Therefore, because TCDD is present as a low-level contaminant in commercial samples of silvex, references in this document to "silvex" or the "pesticide product" mean silvex that is contaminated with TCDD.] caused reproductive and oncogenic effects in test animals. During the public debate initiated by the 2,4,5-T RPAR (43 FR 17116, April 21, 1978), the Agency received reports that women living in the vicinity of Alsea, Oregon, had miscarriages shortly after 2,4,5-T was sprayed in the forest areas where they reside. The Agency investigated the circumstances surrounding these reported miscarriages and compared the frequency of miscarriage in the Alsea area with

comparable data from a control area. The Agency has concluded that the use of 2,4,5-T over a six-year period in the Alsea area was related to a statistically significant increase in the frequency of miscarriages by women residents of the area, and that these miscarriages occurred shortly after the use of 2,4,5-T in the area where these women resided.

Based on this and other information, I am ordering several emergency suspensions under FIFRA Section 6(c), which halt the distribution, sale, and use of 2,4,5-T for forestry, rights-of-way, and pastures until the completion of further administrative proceedings. Pasture is defined as land producing forage for animal consumption, harvested by grazing, which has annual or more frequent cultivation, seeding, fertilization, irrigation, pesticide application, and other similar practices applied to it. Fence rows enclosing pastures are included as part of the pasture. For details, see the risk discussion in Section IV of this document and the 2,4,5-T suspension document, published simultaneously with this document. Because both silvex and 2,4,5-T are contaminated with TCDD, and because of similarities in chemical structure, manufacturing processes, use patterns, and effects in experimental systems, I consider it prudent to take similar regulatory action against silvex. I am therefore ordering emergency suspension of the forestry, rights-of-way, and pasture uses of silvex because I find that they pose an "imminent hazard" to humans and to environment; I also find that an "emergency" exists because there not enough time to hold a suspension hearing before the next spraying season.

In addition, I am ordering the emergency suspension of the home and garden, aquatic weed control/ditch bank, and commercial/ornamental turf uses of silvex. These additional uses of silvex are comparable to uses of 2,4,5-T cancelled or suspended in 1970 because of concern that exposure to 2,4,5-T and/or TCDD posed an imminent hazard to humans and to the environment. I now make similar findings of imminent hazard for these uses of silvex. I also find that an emergency exists relative to these uses because there is not enough time to hold a suspension hearing before the spring and early summer period of major silvex application for home and garden, aquatic weed control/ditch bank, and commercial/ornamental turf uses. In addition, I find that the year-round of silvex in certain areas of the country adds to the urgency of the situation for the home and garden and commercial/ornamental turf uses.

II. LEGAL AUTHORITY

A. Standards for Maintaining a Registration

In order to obtain a registration for a pesticide under FIFRA, a manufacturer must demonstrate that the pesticide satisfies the statutory standard for registration. That standard requires (among other things) that the pesticide perform its intended function without "unreasonable

adverse effects" on the environment [FIFRA Section 3(c)(5)].

"Unreasonable adverse effect on the environment" means "any unreasonable risk to man or the environment, taking into account the economic, social and environmental costs and benefits of the use of any pesticide" FIFRA Section 2(bb)]. In effect, this standard requires a finding that the benefits of each use of the pesticide exceed the risks of the use. The burden of proving that a pesticide satisfies the registration standard rests with the registrant and continues for as long as the registration remains in effect [Environmental Defense Fund v. Environmental Protection Agency, 510 F.2d 1292, 1297 (D.C. Cir., 1975); Environmental Defense Fund v. Environmental Protection Agency, 465 F.2d 528, 532 (D.C.Cir., 1972)]. Under Section 6 of FIFRA, the Administrator is required to cancel the registration, or change the classification, of a pesticide whenever he determines that the pesticide no longer satisfies the statutory standard for registration.

Disclaimer: Please read the pesticide label prior to use. The information contained at this web site is not a substitute for a pesticide label. Trade names used herein are for convenience only; no endorsement of products is intended, nor is criticism of unnamed products implied. Most of this information is historical in nature and may no longer be applicable.

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For more information relative to pesticides and their use, please contact the PMEP staff at:

**5123 Comstock Hall
Cornell University
Ithaca, NY 14853-0901
(607)255-1866**

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