

24-D/TOX

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Releasable

DATE: June 12, 1978

SUBJECT: Section 18 Exemption for 2,4-D on Millet, North Dakota. Caswell No. 315

FROM: Toxicology Branch
Reto Engler, Ph.D



TO: SRS, MR. D. Rodier

We have previously performed a hazard evaluation on the use of 2,4,-D on millet (see memos of Oct. 11, 1977, R. Engler and R. Coberly, PP# 7E 1980) and we have concluded that the risk if any for humans and domestic animals is negligible, and thus acceptable.

CB in a memo dated Dec 8, 1977 (PP# 7E1980) has pointed out that the Formulation may contain N-nitrosamines.

Residues if any of N-nitrosamines on millet are not of toxicological concern since (i) millet is not a human food item (ii) the residues are extremely small, and (iii) very likely not stable.

N-nitrosamines in the formulation may be of concern with regard to applicator safety, however, the use on millet is not different from any other use of 2,4-D and does not constitute a novel risk. 2,4-D has been considered by OSPR to be included in pre RPAR - review, presumably based on the so called Reuber Report. Toxicology Branch, however, has concluded that the rat oncogenicity study conducted at FDA demonstrate that 2,4-D has no oncogenic effect under the test conditions.

RD:G.E.Whitmore:JG:6/15/78

for GEW 6/12/78

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