U TED STATES ENVIRONMENTAL PR ECTION AGENCY

SUBJECT: 2,4,-D tolerances

DATE: December 23, 1975

FROM: Toxicology Branch

TO: Product Manager (Mountford)
Special Registration Section (Baker)

Petitions:	2E1293	5ppm on apricots	IR-4
	6E1678	5ppm on citrus (from/PHA)	IR-4
	1E1046	1ppm fish & shellfish	Corps of Engineers
	6H5104	o.1ppm in water	"
	3E1390	1ppm fish	TVA
	3H5032	0.1ppm in water	"

Conclusion: CB permitting all tolerances can be toxicologically supported.

Review:

1. The toxicity of 2,4,-D has been previously reviewed, and furthermore 2,4,-D showed no data gaps when reviewed for reregistration. The NEL for 2-year rat feeding studies was shown to be 1250ppm and in a 3 generation rat reproduction study the NEL was 500ppm. 2,4,-D also showed no teratogenicity. Using a 100 fold safety factor the ADI for man would be 0.25mg/kg/day or 10ppm in his diet.

2. There is already a FAP of 0.1ppm in water established for the western part of the US (CFR 123.100).

3. There is already a tolerance established of 5ppm on citrus from preharvest use and a 5ppm tolerance on lemons from post harvest uses. The extension of the post-harvest use to all citrus (1678) thus will not change the actual exposure.

4. A tolerance of 5ppm on apricots is insignificant vis a vis the 5ppm tolerance on citrus.

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OEP 12/23/75

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