The Safer Choice

How to Avoid Hazardous Home, Garden, Community and Food Use Pesticides

Join the Consumer Campaign to Stop Dow Chemical Company from Marketing Hazardous Pesticides



JOIN THE CONSUMER CAMPAIGN TO STOP DOW FROM MARKETING HAZARDOUS PESTICIDES

Dow Chemical Company (and its pesticide division Dow AgroSciences) produces some of the most hazardous home, garden, and food use pesticides that invade our lives on a daily basis -- toxic chemicals that are dangerous to children, families and the environment. Safer alternative practices and products are now widely available, which makes these pesticides unnecessary. As part of a consumer campaign to stop corporations from marketing hazardous pesticides that are not needed, this booklet informs choices in the marketplace and helps consumers avoid harmful low-level toxic exposure. While the primary focus of this brochure is non-food use pesticides (home, garden and community), many of the hazardous pesticides identified also have food and forestry uses, which are noted. However, Dow Chemical markets dozens more pesticides that are strictly food use chemicals, but not detailed in this brochure.

HOW TO USE THIS BOOKLET

This booklet focuses on seven toxic Dow Chemical pesticides, a combination of weedkiller (herbicide) and insecticide products that are widely used and available in the marketplace. It is intended to summarize the health and environmental concerns associated with each product, identify how it is commonly used in the home and garden, community and food production and then offer suggestions on alternatives to using these toxic chemicals.

THE CONSUMER LINK TO DOW CHEMICAL

It is often difficult for consumers to identify the chemicals that they are purchasing either in a product or through a contracted service. This is particularly true with Dow Chemical products because most of the hazardous pesticides that Dow Chemical produces are used in products marketed by other companies, such as the weedkiller 2,4-D, which is the primary herbicide in the Scotts Company's Weed and Feed lawn product. To help sort through the various ways in which consumers can stop their family's toxic chemical exposure and protect the environment, this brochure identifies three categories in which consumers can take steps to stop the use of hazardous Dow Chemical pesticides.

Products that have Dow ingredients.

It is common for consumer products to contain Dow Chemical-produced ingredients. To avoid these hazardous chemicals, you must read the label ingredient statement and avoid products marketed under other company names – such as the weedkiller 2,4-D, which is in Scotts' Weed and Feed, Miracle-Grow's Weed and Feed, and many other products.

Pest control or lawn care companies that use Dow products.

When hiring a service company to take care of a pest problem or lawn, the company may use a hazardous Dow Chemical product. In fact, sometimes a company uses restricted chemicals that are not directly available to consumers, such as sulfuryl fluoride, used for drywood termite and household insect control and marketed under the trade name Vikane.

• Food commodities grown with Dow products.

If you eat chemically-produced food, from vegetables to grains to nuts, you are probably ingesting the Dow Chemical products that are listed in this brochure, which have both non-agricultural and agricultural uses. None of these products are acceptable in organic production, so buying organically produced food is a good way to avoid them.

Advocating for change to protect health and the environment

In order to combat the widespread use of the hazardous Dow Chemical products listed in this brochure and curtail their impact on health and the environment, we can make personal choices in the marketplace to avoid these chemicals. In addition, we can influence community decisions as well as urge corporations to stop using or supporting the use of these chemicals. This booklet makes suggestions on advocating changes in community management practices in schools, parks, libraries, and hospitals, and influencing food company decisions to utilize food ingredients that are not grown with these hazardous chemicals.

2,4-D

The Killer Weedkiller

2,4-D is highly toxic herbicide used to control many types of broadleaf weeds. With over 40 million pounds used annually, it is the most commonly used pesticide in the non-agricultural sector and the sixth most commonly used in agriculture.¹ Dow AgroSciences is the sole U.S. producer of 2,4-D, which it sells to other chemical and lawn care companies to formulate into finished products.² Over 70 different products contain 2,4-D as their active ingredient, including: Scott's Weed and Feed, Miracle-Grow Weed and Feed, Ace Green Turf Weed and Feed, and many more.³

HEALTH AND ENVIRONMENTAL CONCERNS

- A 2003 study found 2,4-D in the dust in 63% of sampled homes.⁴
- 2,4-D is an endocrine disruptor, which can interfere with hormone function and contribute to breast and testicular cancer, birth defects, and learning problems.⁵
- Several studies have linked 2,4-D to non-Hodgkin's lymphoma.⁶
- According to EPA, the risk of short-term toddler exposure to treated lawns is above the agency's level of concern even without taking into account indoor air exposure.⁷
- Dogs of owners who regularly use 2,4-D on their lawns are twice as likely to get cancer.8
- Mixtures of 2,4-D and other commonly used lawn chemicals are capable of inducing abortions in laboratory animals.⁹
- 2,4-D made up a major portion of Agent Orange, linked to long-term disease in Vietnam War veterans.¹⁰

KEEP 2,4-D OUT OF YOUR ...

HOME & GARDEN

Used on: lawns and gardens, especially weed and feed products.

**What You Can Do: Effective management techniques that include organic products and cultural practices prevent weeds and eliminate the need for toxic chemicals.

- Hire only service providers that use organic and least-toxic techniques and cultural practices.
- Corn gluten makes an excellent pre-emergent herbicide and is sold at most garden stores. Brand names include Bio-Weed, Concern and GreenSense.
- Fatty-acid soap products, such as Safer and Sharpshooter, can control weeds that have already sprouted.
- For a homemade spot treatment, try boiling water, vinegar, or a mixture of 1 cup vinegar and 1/4 cup lemon juice.
- Of course, don't forget good old fashioned hand-pulling!

COMMUNITY

Used on: golf courses, schools, parks, and for invasive weed control.

**What You Can Do: Contact your local golf courses, schools and parks and ask them not to use 2,4-D. Explain the health effects and recommend an integrated pest management program which uses pesticides only as a last resort. If you live in an area that manages invasive weeds, contact your local government as well (see p. 10 for invasive weed alternatives).

FOOD

Used on: oats, corn, barley, wheat, sorghum, asparagus, strawberries, and sugarcane. **What You Can Do:

Buy organic food products whenever possible.

Write to Quaker Oats, PO Box 049003, Chicago, IL 60604, and ask them to stop buying oats grown with 2,4-D.

Chlorpyrifos The Neurotoxic Nightmare

Chlorpyrifos is a widely used broad-spectrum insecticide used to kill a wide variety of insects in the urban, rural and farm environments. Dow AgroSciences is the primary manufacturer of chlorpyrifos worldwide and the only manufacturer in the U.S.¹¹ In 2000, the U.S. EPA and Dow reached an agreement to stop the sale of most home, lawn and garden uses for chlorpyrifos because of its health risks to children. Dow still markets Dursban, which contains chlorpyrifos, for home use in baits, on golf courses and in non-residential buildings, and for mosquito control. Dow also produces Lorsban for use on a wide variety of food crops.

HEALTH AND ENVIRONMENTAL CONCERNS

- Chlorpyrifos belongs to the family of organophosphate pesticides, a highly toxic class of pesticides that affects the central nervous, cardiovascular and respiratory systems.¹²
- Chlorpyrifos has been linked to thousands of pesticide poisoning incidents, leading all other pesticides for acute poisoning in 1997.¹³
- A 1996 study of children exposed to chlorpyrifos in utero found extensive and unusual patterns of birth defects, including brain, nervous system, eyes, ears, palate, teeth, heart, feet, and genitalia.¹⁴
- Even at extremely low doses, chlorpyrifos was found to affect the learning abilities of female rats to a larger extent than males. Similarly, newborn animals were shown to be more susceptible to chlorpyrifos exposure than adults.¹⁵
- Other studies showed that chlorpyrifos exposure caused structural alterations in developing brains.¹⁶

KEEP CHLORPYRIFOS OUT OF YOUR...

HOME & GARDEN

Found in: over-the-counter bait stations for roach and ant control.

**What You Can Do: Effective integrated pest management incorporates mechanical, sanitary and least toxic pesticide products.

- Clean and eliminate any potential food and water sources.
- Caulk and patch cracks and other entry points into your home.
- Use non-volatile boric acid based bait stations and products.

COMMUNITY

Used on: golf courses, office buildings, rights-of-way, and is applied aerially and by ground for public health mosquito control.

**What You Can Do:

- Contact local golf courses and let them know that Dursban is dangerous to children.
- Contact your office building manager and ask them not to use or hire companies that use chlorpyrifos baits when they have pest problems. Recommend an integrated pest management program, which uses pesticides only as a last resort.
- If your community is spraying for a mosquito-borne disease, contact your local mosquito management officials (Dept. of Health, Mosquito Abatement District, etc.) and ask that they switch to management techniques that use a Bt-based larvicide as the first line of defense.

FOOD

Used on: grain, cotton, fruit, nut, and vegetable crops. **What You Can Do:

- Buy organic food products whenever possible.
- Mott's is a major producer of apple juice and other apple-based products consumed by children. Contact Mott's (900 King St., Rye Brook, NY 10573) and ask them to stop buying apples sprayed with Lorsban.

Sulfuryl Fluoride

The Fatal Fumigant

Sulfuryl fluoride, a gas fumigant, is used to control termites and other insects in structures, vehicles, and wood products. Dow AgroSciences is one of the major manufacturers of sulfuryl fluoride, producing it at a plant in Pittsburg, California, and marketing it under the names Vikane and Profume. Vikane is a restricted use pesticide, for sale to and use only by certified applicators. In 2001, Dow received a permit to manufacture sulfuryl fluoride for post-harvest fumigation on certain agricultural commodities.¹⁷

HEALTH AND ENVIRONMENTAL CONCERNS

- Because it is a colorless, odorless gas, Vikane poses an acute inhalation hazard.¹⁸ The product label contains the word "Danger," EPA's highest acute toxicity category.
- Repeated or prolonged exposure to sulfuryl fluoride may cause injury to the lungs and kidneys, weight loss, anemia, and general ill health.¹⁹
- EPA did not require any cancer tests for the registration of sulfuryl fluoride and little is known about its carcinogenic potential.²⁰
- There have been documented cases of people becoming seriously ill or dying after re-entering houses treated with Vikane.²¹
- According to ATSDR, subsets of the population may be susceptible to the toxic effects of fluoride, including the elderly and people with nutritional deficiencies and cardiovascular and kidney problems. CITE--JOHN
- Excessive fluoride has also been linked to Alzheimer's, memory loss, neurological impairment, kidney damage, cancer, genetic damage, and more.²²

KEEP SULFURYL FLUORIDE OUT OF YOUR...

HOME

Used in: fumigants used by professional pest control providers for drywood termite control.

**What You Can Do: Alternatives do exist! Make it clear to your pest control provider that you don't want them to use Vikane® in your home. The following is a list of alternative options:

- Heat treatments and liquid nitrogen are effective in controlling termites and carpenter ants that have minimum and maximum temperature thresholds beyond which they cannot survive.
- Electrical current technology, such as Electrogun, can be used to kill insects that nest in the walls of a structure.
- Because of its stability, Boric Acid is a low risk insecticide effective against termites. Ask a professional to use it instead of fumigation.
- Diatomaceous earth and silica aerogels are insecticidal dusts that can be used to prevent termite infestations.

COMMUNITY

Used in: schools, workplaces, public buildings and hospitals.

¹**What You Can Do: Contact your local schools, hospitals, offices and other public buildings, and ask them not to use Vikane when they have termite and other insect problems. Recommend an integrated pest management program that uses pesticides only as a last resort. Refer to the above list for alternative options.

FOOD

Used in: warehouses and transport containers that contain nuts, dried fruits, cereals and grains (corn, oat, rice, wheat, etc.).

**What You Can Do:

- Buy organic whenever possible, especially for dried fruit and nuts.
- Ask the Sun-Maid Raisin Company (13525 So Bethel Ave, Kingburg, CA 93631) to make sure their warehouses and shipping companies are not fumigating with Profume.

Clopyralid & Triclopyr The Deadly Duo

Clopyralid and triclopyr are two powerful weed killers used to manage unwanted plants in lawns and turf, pasture, rights-of-way and various crops. Dow AgroSciences formulates these chemicals together for non-agricultural uses in a product called Confront, and alone in Lontrel (clopyralid) and Turflon (triclopyr). For agricultural uses, both chemicals are formulated in various products with other herbicides such as 2,4-D (see p. 3). Transline (clopyralid) is commonly used for invasive weed management.

HEALTH AND ENVIRONMENTAL CONCERNS

- EPA tests show that clopyralid causes "substantial" reproductive problems, including reduced fetal weight, skeletal abnormalities, and hydrocephaly (accumulation of excess fluid around the brain).²³
- In laboratory tests, triclopyr caused a significant increase in the incidences of breast cancer and genetic damage in rat embryos.²⁴ Studies also link triclopyr to kidney and reproductive problems.²⁵
- In 2002, EPA deleted all residential use from the label of clopyralid products after numerous studies documented widespread contamination of compost with high levels of clopyralid.²⁶ This led to a ban in some parts of New York State.
- Studies have shown both triclopyr and clopyralid to be very stable in soil with the potential to leach into groundwater and contaminate surface water.²⁷
- EPA has not evaluated the carcinogenic potential for either clopyralid or triclopyr.²⁸

KEEP CLOPYRALID AND TRICLOPYR OUT OF YOUR...

COMMUNITY

Used on: golf courses, parks, schools, rights-of-way, and for invasive weed control.

**What You Can Do: Contact your local schools, parks and golf courses, and ask them to not use Confront or Lontrel on their lawns. Alert them to the dangers of clopyralid and triclopyr, and recommend an integrated pest management program that uses pesticides only as a last resort. Effective management techniques that include organic products and cultural practices prevent weeds and eliminate the need for toxic chemicals.

- Ask golf course managers and park and school superintendents to only hire service providers that use organic and least-toxic techniques and cultural practices.
- As an alternative for park and schoolyard uses, recommend corn gluten (Bio-Weed, Concern and GreenSense) as a pre-emergent herbicide and Fatty-acid soap (Safer, Sharpshooter).
- For invasive weeds, recommend an integrated weed management program that focuses on mechanical methods, grazing, biological controls, soil health and native plant restoration, and uses pesticides only as a last resort.

FOOD

Used on: wheat, barley, rice, field corn, sugar beets and oats. **What You Can Do:

- Buy organic food products whenever possible.
- Contact the Pepperidge Farm Company (595 Westport Avenue, Norwalk, CT 06851 or www.pepperidgefarm.com/contact.asp) and ask them to stop buying wheat sprayed with clopyralid and/or triclopyr.

Atrazine The Gender Bender

Atrazine is the second most commonly used agricultural pesticide in the U.S.,²⁹ and the first most commonly detected in rivers, streams and wells.³⁰ Dow AgroSciences sells one product containing atrazine, Keystone LA, which is registered for use on corn. Annually, 75% of all corn in the U.S. is treated with atrazine.³¹ Other atrazine formulations are registered for use on sorghum and sugarcane. Atrazine is also sold as a weedkiller for use on lawns by a number of companies, not including Dow.

HEALTH AND ENVIRONMENTAL CONCERNS

• Atrazine is an endocrine disruptor, which can interfere with hormone function and can contribute to breast and testicular cancer, birth defects, and learning problems. Atrazine can affect levels of testosterone, progesterone, estrogen and thyroid hormones.³²

■ Recent studies show that exposure to levels of atrazine found in the environment, even at levels far below EPA's drinking water limits, demasculinizes tadpoles and turns developing frogs into hermaphrodites – with both male and female sexual characteristics.³³

- Other studies have found that atrazine delays puberty and affects prostate development in rats.³⁴
- Several studies have shown that atrazine causes genetic damage, even at extremely low concentrations. ³⁵

Atrazine is an immunotoxic chemical, which means it disrupts the normal functions of the immune system, enhancing the risk of infectious disease or cancer.³⁶

KEEP ATRAZINE OUT OF YOUR...

HOME & GARDEN

Used on: lawns and gardens.

**What You Can Do: Effective management techniques that include organic products and cultural practices prevent weeds and eliminate the need for toxic chemicals.

- Hire only service providers that use organic and least-toxic techniques and cultural practices.
- Corn gluten makes an excellent pre-emergent herbicide and is sold at most garden stores. Brand names include Bio-Weed, Concern and GreenSense.
- Fatty-acid soap products, such as Safer and Sharpshooter, can control weeds that have already sprouted.
- For a homemade spot treatment, try boiling water, vinegar, or a mixture of 1 cup vinegar and 1/4 cup lemon juice.
- Of course, don't forget good old fashioned hand-pulling!

FOOD

Used on: corn. Atrazine produced by other companies is also used on sugarcane, sorghum, and pineapples. **What You Can Do:

Buy organic corn and organic corn products whenever possible.

Kellogg's, the maker of the maker of the popular breakfast cereal Corn Flakes, as well as many children's cereals, is one major brand of cereals that are often marketed as healthy. Kellogg's even owns an organic line of products, Morningstar Farms. Contact their headquarters by writing to: Kellogg ConsumerAffairs, P.O. Box CAMB, Battle Creek, MI 49016, or by going to http://www.kelloggs.com/contact/index.html and ask them to stop buying corn crops that have been treated with atrazine, especially those that go into breakfast cereals and other food products marketed to children.

Picloram The Persistent Pesticide

Picloram is a persistent herbicide used to control broadleaf weeds and woody plants especially on rights-of-way, rangeland and pastures, and in forestry. It is frequently used in invasive weed management programs as well. Dow, the sole producer of picloram³⁷, markets it under the trade names Tordon, Pathway, and Grazon. EPA designates picloram as a restricted use pesticide, for use by licensed applicators only. Picloram is banned in California.³⁸ For some products, Dow formulates picloram together with 2,4-D (see p. 3).

HEALTH AND ENVIRONMENTAL CONCERNS

- Picloram products have been associated with a number of reports of human poisoning. Exposure causes skin and eye irritation, headaches, fatigue, and memory loss.³⁹ Laboratory tests have linked picloram to liver, kidney, and spleen damage.⁴⁰
- Studies of picloram and 2,4-D in combination have demonstrated that this mix causes birth defects and decreases in birth weights of mice.⁴¹ Livestock exposed to these two herbicides have increased mortality and frequency of intestinal cancer.⁴²
- Because it is persistent and highly mobile in soil, picloram is a commonly detected contaminant in ground and surface water.⁴³ This is especially worrisome because picloram is highly toxic to fish and has been linked to fishkills following roadside use.⁴⁴
- After review, EPA's Ecological Effects and Groundwater Branches recommended that Picloram be cancelled.⁴⁵ However, in the 1995 reregistration of picloram, EPA's Office of Pesticide Programs failed to act on the recommendations.⁴⁶

KEEP PICLORAM OUT OF YOUR...

COMMUNITY

Used on: roadsides, rangelands, rights-of-way, forestry projects and in invasive weed management. **What You Can Do: Contact your state department of transportation, utility company and open space managers and ask them to not use picloram-based products. Alert them to the dangers of picloram and recommend an integrated pest management program that uses pesticides only as a last resort. An integrated approach that focuses on ecosystem and soil health eliminates the need for toxic herbicides. Successful alternative strategies for invasive weed management include:

- Mechanical Controls, such as hand pulling and weed harvesting machines.
- Biological Control agents, such as beneficial insects, can selectively remove one weed species from a pasture, range, and/or natural ecosystem. The use of biological controls is economical and once established, these insect species provide permanent, effective control of the weed or other pests.
- Grazing is a non-toxic solution to invasive weed management, that improves soil health through fertilization and aeration. Commercial grazing companies, such as Ewe4ic Ecological Services, can be hired to manage weeds on isolated rangelands or in city parks.

FOOD

Used on: wheat, barley, and oats grown in areas west of the Mississippi River **What You Can Do:

Buy organic grains whenever possible.

BEYOND PESTICIDES

701 E Street SE, # 200, Washington DC, 20003 202-543-5450 info@beyondpesticides.org www.beyondpesticides.org

Beyond Pesticides, working with allies to protect public health and environment, is leading the transition to a world free of toxic pesticides. The organization is a national, community-based collection of grassroots groups and individuals, bridging environmental and health concerns to: (i) stimulate widespread education on the hazards of toxic pesticides, and the availability of effective alternative pest management approaches; (ii) influence decision makers responsible for pest management to use safe methods through grassroots action; and, (m) encourage the adoption of local, state, and national polices that stringently restrict pesticide use and promote alternative approaches that respect health and the environment.

Why Dow Chemical Company?

It's true; there are a lot of companies that are getting rich off of producing poisonous chemicals to which you and your family are exposed. But Dow has another dirty secret.

In 2001, Dow Chemical purchased Union Carbide, thereby acquiring its assets and liabilities. Union Carbide is the company responsible for the 1984 gas leak in Bhopal, India, known as the "Hiroshima of the chemical industry," which remains the worst industrial disaster in human history. To this day, Dow has steadfastly refused to clean up the site, provide safe drinking water, compensate the victims, or disclose information about the health effects of the leaked gases, which doctors could use to properly treat the victims.

Protect your family from toxic hazards and help the families of Bhopal receive justice by boycotting the Dow products listed in this brochure. Contact Dow CEO Andrew Liveris (2030 Dow Center, Midland, MI 48674 or 989-636-1000) and demand that the company take responsibility in Bhopal.

¹ U.S. EPA. 2004. *2000-2001 Pesticide Market Estimates.* Office of Prevention, Pesticides and Toxic Substances, May. < <u>http://www.epa.gov/oppbead1/pestsales/01pestsales/table_of_contents2001.html</u> >

² Letter from Gerald L. Ytzen, Global Business Director, Dow AgroSciences to Allison Giles, Majority Chief of Staff Committee on Ways and Means, U.S. House of Representatives. Re: H.R. 4484, 107th Congress—Opposition to Temporary Duty Suspension Bill. June 5, 2002. < <u>http://waysandmeans.house.gov/legacy/trade/107cong/tradebills/hr4484dowagroscience.pdf</u> > (November 1, 2004)

³ California Department of Pesticide Regulation. 2004. List of Registered Active Ingredients and Numbers of Products. <<u>http://www.cdpr.ca.gov/docs/label/actai.htm</u>> (Accessed October 28, 2004).

⁴ Rudel, R., et al. 2003. Phthalates, Alkylphenols, Pesticides, Polybrominated Diphenyl Ethers, and Other Endocrine-Disrupting Compounds in Indoor Air and Dust. *Environmental Science and Technology* 37(20): 4543-4553.

⁵ Colborn, T., Saal, F.S. and Soto, A.M. 1993. Developmental Effects of Endocrine-Disrupting Chemicals in Wildlife and Humans, *Environmental Health Perspectives* 101 (5): 378-384.

⁶ Cox, C. 1999. Herbicide Factsheet: 2,4-D: Toxicology, Part 2. *Journal of Pesticide Reform* 19(2): 14-19.

⁷ Beyond Pesticides, et al. 2004. RE: 2,4-D Risk Assessment; Docket ID No. OPP-2004-0167. *EPA 2,4-D Risk Assessment Public Comments*, August 23. <<u>http://www.beyondpesticides.org/watchdog/comments/24D_0804.pdf</u>>

⁸ Hayes, H. M. et al. 1991. Case-control study of canine malignant lymphoma: positive association with dog owner's use of 2,4-D herbicides. *Journal of the National Cancer Institute* 83 (17): 1226-1231.

⁹ Cavieres, M., et al. 2002. Developmental toxicity of a commercial herbicide mixture in mice: I.Effects on embryo implantation and litter size. *Environmental Health Perspectives* 110: 1081-1085.

¹⁰ Extension Toxicology Network (ETN). 1996. Pesticide Information Profile for 2,4-D. <<u>http://extoxnet.orst.edu/pips/24-</u> D.htm > (June 21, 2004).

¹¹ Dow AgroSciences, LLC. 2004. About Chlorpyrifos. <<u>http://www.dowagro.com/chlorp/about/index.htm</u>> (October 26, 2004).

¹² Beyond Pesticides. 2000. Chlorpyrifos. *ChemWatch Factsheet.*

<<u>http://www.beyondpesticides.org/pesticides/factsheets/Chlorpyrifos.pdf</u>>

¹³ Ibid.

¹⁴ Sherman, J. 1996. Chlorpyrifos (Dursban) associated birth defects. *Archives of Environmental Health* 51(1): 5-8.

¹⁵ Levin, E., et al. 2002. Prenatal chlorpyrifos exposure in rats causes persistent behavioral alterations. *Neurotoxicology and Teratology* (24) 6: 733-741.

¹⁶ U.S. EPA. 2000. Human health risk assessment: chlorpyrifos. Office of Pesticide Programs. Health Effects Division. <<u>http://www.epa.gov/pesticides</u>> (October 26, 2004).

¹⁷ Connett, Ellen. 2004. Fluorine and Organofluorine Pesticides. Fluoride Action Network, Pesticide Project website. <<u>http://www.fluoridealert.org/f-pesticides.htm</u>> (October 26, 2004).

¹⁸ NPTN. 2000. Sulfuryl Fluoride. < <u>http://npic.orst.edu/factsheets/sfgen.pdf</u>>

¹⁹ Fluoride Action Network Pesticide Project. 2004. Adverse Effects (1) Sulfuryl fluoride CAS No. 2699-79-8.

<<u>http://www.fluorideaction.org/pesticides/epage.sulfuryl .fluoride.htm</u>>

²⁰ NPTN. 2000. Sulfuryl Fluoride. <<u>http://npic.orst.edu/factsheets/sfgen.pdf</u>>

²¹ Fluoride Action Network Pesticide Project. 2004. Adverse Effects (1) Sulfuryl fluoride CAS No. 2699-79-8.

<http://www.fluorideaction.org/pesticides/epage.sulfuryl.fluoride.htm>

²² Fluoride Action Network. 2004. Fluoride Health Effects <<u>http://www.fluoridealert.org/health.htm</u>>

²³ U.S. EPA. Office of Pesticides and Toxic Substances. 1991. 3,6-dichloro-2-pyridinecarboxylic acid (clopyralid): Review of a rabbit teratology study submitted by the registrant. Memo from T. F. McMahon, Health Effects Division, to E. Wilson, Registration Division. Washington, D.C., Mar. 20. As cited in Cox, C. 2000. Triclopyr Factsheet. *Journal of Pesticide Reform* 20(4): 12-19.

²⁴ U.S. EPA. Office of Prevention, Pesticides, and Toxic Substances. 1996. Carcinogenicity peer review of triclopyr. Memo from McMahon, T.F., and E. Rinde, Health Effects Div., to R. Taylor, Registration Div. And T. Luminello, Special Review and Reregistration Div. Washington, D.C., May 9, As cited in Cox, C. 2000. Triclopyr Factsheet. *Journal of Pesticide Reform* 20(4): 12-19.; U.S. EPA. Prevention, Pesticides, and Toxic Substances. 1998. Reregistration eligibility decision (RED): Triclopyr. Washington, D.C., Oct, pp.14-15.

²⁵ Cox, C. 2000. Triclopyr Factsheet. Journal of Pesticide Reform 20(4): 12-19.

²⁶ Dow Agrosciences, LLC. 2002. Dow AgroSciences Discontinues U.S. Residential Turf Uses of Herbicide Clopyralid. July 26. <u>http://www.dowagro.com/newsroom/corporatenews/2002/072602.htm</u>; **Michel, F.C., Jr.** and D. Doohan. Clopyralid and Other Pesticides in Composts. *Ohio State University Extension Fact Sheet.* <<u>http://ohioline.osu.edu/aex-fact/0714.html</u>> (Accessed October 27).

²⁷ Cox, C. 2000. Triclopyr Factsheet. *Journal of Pesticide Reform* 20(4): 12-19.; U.S. EPA. Office of Prevention, Pesticides, and Toxic Substances. 1997. Triclopyr. EPA R.E.D. Facts. <<u>http://www.epa.gov/oppsrrd1/REDs/factsheets/2710fact.pdf</u>>

²⁸ Cox, C. 2000. Triclopyr Factsheet. Journal of Pesticide Reform 20(4): 12-19.

²⁹ U.S. EPA. Office of Prevention, Pesticides, and Toxic Substances. 2001. Atrazine: HED's revised preliminary human health risk assessment for the reregistration eligibility decision (RED). Washington D.C.: 5-7.

<<u>www.epa.gov/oppsrd1/reregistration/atrazine/index.htm</u>> (October 28, 2004).

³⁰ U.S. Geological Survey. 1999. THe quality of our nation's water—nutrients and pesticides. *USGS Circular* 1225: 60-61. ³¹ U.S. EPA. Office of Prevention, Pesticides, and Toxic Substances. 2003. Interim Reregistration Eligibility Decision for Atrazine. Case no. 0062. January.

³² Cox, C. 2001. Atrazine. Journal of Pesticide Reform 21(2): 12-20.

³³ Hayes TB, Collins A, et al. 2002. Hermaphroditic, demasculinized frogs after exposure to the herbicide atrazine at low ecologically relevant doses. *Proceedings of the National Academy of Sciences.* 99(8): 5476-80.

³⁴ Cox, C. 2001. Atrazine. Journal of Pesticide Reform 21(2): 12-20.

³⁵ Cox, C. 2001. Atrazine. Journal of Pesticide Reform 21(2): 12-20.

³⁶ Cox, C. 2001. Atrazine. *Journal of Pesticide Reform* 21(2): 12-20.

³⁷ U.S. EPA. 1995. Office of Prevention, Pesticides, and Toxic Substances. Picloram. Reregistration Eligibility Decision.

<<u>http://www.epa.gov/oppsrrd1/REDs/0096.pdf</u>> (Accessed October 28, 2004).

³⁸ California Department of Pesticide Regulation. 2004. List of Registered Active Ingredients.

<<u>http://www.cdpr.ca.gov/docs/label/actai.htm</u>> (Accessed October 28, 2004).

³⁹ National Coalition Against the Misuse of Pesticides. 1988. Picloram. *Pesticides and You* 8 (3).

⁴⁰ U.S. EPA. Office of Prevention, Pesticides, and Toxic Substances. 1995. Picloram. *R.E.D. Facts*,

<<u>http://www.epa.gov/oppsrrd1/REDs/factsheets/0096fact.pdf</u>> (Accessed October 28, 2004).

⁴¹ Cox, C. 1998. Picloram. *Journal of Pesticide Reform* 18(1): 13-20.

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