

**MEMORANDUM**

TO: Misha Cetner, Department of Environmental Conservation

FROM: Sarah Vose, State Toxicologist

SUBJECT: Aquatic Nuisance Control Permit, ProcellaCOR, EPA Registration 67690-80

DATE: April 4, 2019

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The Vermont Department of Environmental Conservation (DEC) recently received aquatic nuisance control permit applications that propose use of the aquatic herbicide product ProcellaCOR with the active ingredient florpyrauxifen-benzyl, to help control the growth and spread of the aquatic nuisance plant Eurasian watermilfoil.

Per the request of DEC, the state of Vermont Department of Health (Health) has examined the product proposed for use in 2019 and the potential level of concern for public health that may be associated with exposure to water that has been treated with such. Health reviewed the 2019 permit applications for the use of ProcellaCOR at Burr Pond, Hortonia Lake, Indian Brook Reservoir, Morey Lake, Lake St. Catherine, and Sunrise Lake.

The EPA label for ProcellaCOR does not include any restrictions on use of the treated water for domestic (including drinking and cooking) or recreational use. The proposed treatments at the six sites would result in a maximum floryrauxifen-benzyl concentration of 7.72 ppb, or ~4 PDUs. The EPA label allows use of up to 25 PDUs, which corresponds to roughly 50 ppb. While EPA identified no adverse impacts in animals across the required toxicology studies, Health selected a point of departure of 300 mg/kg/day and derived a chronic oral reference dose of 3 mg/kg/day. Use of this chronic oral reference dose in Health's standard drinking water equations, assuming daily exposure to a 0-1 year old, gives a drinking water health advisory of 3,429 ppb. The drinking water health advisory for florpyrauxifen-benzyl is over 400 times higher than the highest proposed concentration in the treated areas, and over 60 times higher than the highest use amount allowed on the EPA label. Thus, the proposed treatments of the six lakes with ProcellaCOR are expected to result in negligible risk to public health.

Based on a review of the confidential statement of formulation, it is reasonable to conclude that human exposure to the inert compounds contained in ProcellaCOR at the concentrations that would result under the conditions proposed by the applicants, is not likely to result in an increase in the level of concern for public health.



Public notification of property owners and residents of the treated water body area as well as commercial camps and parents whose children are attending camps which use the treated water body and/or waters within one contiguous watermile of the treated water body will occur 30 days prior to application. Water body access areas as well as any nearby campgrounds should be posted for public awareness.