

**MEMORANDUM**

TO: Misha Cetner, Department of Environmental Conservation

FROM: Sarah Vose, State Toxicologist

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

DATE: March 21, 2022

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The Vermont Department of Environmental Conservation (DEC) recently received an aquatic nuisance control permit application that proposes 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 at Lake Bomoseen and the potential level of concern for public health that may be associated with exposure to water that has been treated with such.

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 Lake Bomoseen would result in a maximum florpyrauxifen-benzyl concentration of 5.79 ppb, or ~3 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 590 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.

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. Thus, the proposed treatment of Lake Bomoseen with ProcellaCOR is expected to result in negligible risk to public health, from both the active and inert compounds in ProcellaCOR.



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 should occur 30 days prior to application. Water body access areas as well as any nearby campgrounds should be posted for public awareness.

