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Author		
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Report/Article Title	Memorandum with attachments: Fi Meredith, Jr., Technical Director, D Force, regarding Nonsuspended U of 2,4,5-T and Silvex, dated Janua	Pepartment of the Air lses and Disposition
Journal/Book Title		
Year	1980	
Month/Day		
Color		
Number of Images	7	
Descripton Notes		

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AEPLY TO ATTN OF: CA

3 JAN 1980

SUBJECT: Nonsuspended Uses and Disposition of 2,4,5-T and Silvex

101	HQ AAC/DE	HQ ATC/DE	HQ SAC/DE	AFRES/DE
	HQ AFCC/DE	HQ MAC/DE	HQ TAC/DE	ANGSC/DE
	HQ AFLC/DE	HQ PACAF/DE	HQ USAFE/DE	USAFA/DE
	HQ AFSC/DE	•	•	·

1. The attached DASD (EE&S) memorandum, 11 December 1979, same subject (Atch 1), summarizes available information on nonsuspended uses of 2,4,5-T and Silvex herbicides and provides disposition instructions for unusable stocks. You will note that the number of nonsuspended uses has been expanded as compared with previous guidance.

2. All 2,4,5-T and Silvex products which have valid labels for these nonsuspended uses should be used in accordance with labeling instructions whenever possible, rather than being turned in for disposal.

3. Products which are not labeled for nonsuspended uses or products which an installation cannot apply for a nonsuspended use should be secured until disposed of. The memorandum suggests that installations with unusable 2,4,5-T and Silvex stocks may be able to sell these stocks back to the vendor. At least one USAF installation was successful in selling a moderate quantity of Silvex back to the vendor. This approach should be explored to the fullest extent possible in disposing of unusable stocks of 2,4,5-T and Silvex.

4. A list of herbicides which can be used as substitutes for suspended uses of 2,4,5-T and Silvex is provided with Attachment 1. This list is generic only, and it is mandatory that the desired use of the substitute pesticide be specified on the label of the product chosen before the product is applied.

5. If you have any questions or need more information, please contact our project officer, Major Stephen Valder, AUTOVON 970-6235.

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RERNARD C. MEREDITH, JR. Technical Director

1 Atch DASD (EE&S) Memorandum, 11 Dec 79, w/2 Atch

Cy to: Armed Forces Pest Mgmt Board HQ USAF/SCES HQ AFMSC/SGPA USAFSAM/EKS USAFOEHL/CC HQ USAF/LEEV



WASHINGTON, D. C. 20301

ANPOWER, RVE AFFAIRS D LOGISTICS

11 December 1979

MEMORANDUM FOR DEPUTY FOR ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH, OASA(ILGFM) DEPUTY UNDER SECRETARY OF THE NAVY DEPUTY FOR ENVIRONMENT AND SAFETY, SAF/MIQ DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: Nonsuspended Uses and Disposition of 2,4,5-T and Silvex

This is to follow up on my memoranda of March 9 and March 28, 1979, and provide additional information on the Environmental Protection Agency's (EPA) suspension of the herbicides 2,4,5-T and silvex. I have enclosed copies of those memoranda.

EPA's Office of General Counsel has ruled that the list of nonsuspended uses of 2,4,5-T and silvex products is broader than originally assumed. I have enclosed a current list of nonsuspended uses of both products. I recommend that all military installations be advised of the new nonsuspended uses of 2,4,5-T and silvex, and that those products which have valid labels for those nonsuspended purposes be used.

EPA has also entered into agreements with several formulators of silvex to recall voluntarily silvex products from distributors and dealers. Those agreements did not include products in the custody of users, e.g., DoD. There is, however, the possibility that vendors will voluntarily accept some quantities of silvex or 2,4,5-T products. DoD components should explore the possibility of turn-ins at the installation level of those locally procured, non-standard stock items.

2,4,5-T and silvex products that can not be used, or returned to the vendor, should be secured pending final EPA disposal instructions.

Please call me or LTC Thompson on 427-5191 If we can provide any additional information.

George Marlenthal Deputy Assistant Secretary of Defense (Energy, Environment and Safety)

Enclosure

cc: AFPMB

#### NONSUSPENBED USES

#### <u>2,4,5-T</u>

Rice

Rangeland

Airports

Fences, hedgerows (not otherwise included in suspended uses, e.g. rights-of-way, pasture)

Lumberyards

Refineries

Nonfood crops

Storage areas

Noncrop areas

Wastelands (not otherwise included in suspended uses, e.g., forestry)

Vacant lots

Industrial sites and areas (not otherwise included in suspended uses, e.g., rights-of-way)

#### SILVEX

Rice

Rangeland

Sugarcane

Preharvest fruit drop of apples, prunes and pears

Fence rows, hedgerows, fences (not otherwise included in suspended uses, e.g., rightsof-way, pasture, home and garden)

Nonfood crop areas

Noncrop areas

Storage areas

Waste areas

Vacant lots, parking areas, etc.

Industrial sites or buildings (not otherwise included in suspended uses, e.g., rights-of-way, commercial/ornamental turf)

## 1979 HAR 29 AN 11: 40

#### 2.8 MAR 1979

MEMORANDUM FOR DEPUTY FOR ENVIRONMENT, SAFETY, AND OCCUPATIONAL MEALTH. DASA(ILEFH) DEPUTY UNDER SECRETARY OF THE NAVY DEPUTY FOR ENVIRONMENT AND SAFETY, SAF/MID DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: Suspension Orders for 2.4.5-T and Silvex

This is to follow-up on my memorandum of Narch 9, 1979, and provide additional information on the Environmental Protection Agency's (EPA) suspension order of February 28, 1979, concerning the herbicides 2.4.5-T and sllvex.

I have enclosed a list of registered uses of those herbicides which are still parmitted and the distinction between the definitions of pasture and range lands.

Enclosed also is a list of alternative herbicides for suspended uses of 2,4,5-T and slivex. Your installations should be encouraged to contact their command pest management professionals for approval to use alternative, non-standard herbicides and to provide assistance to modify control programs.

Pending disposal instructions, DoD activities are requested to store existing stocks of 2,4,5-T and silvex which are solely labeled for suspended uses. Pariodic Inspection of those stored stocks is recommanded to preclude health and environmental hazards from leaking liquid formulations.

Sgd. George Marienthal

George Narlanthal Deputy Assistant Secretary of Defense (Energy, Environment & Safety)

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Enclosures

cc: AFPCB

NR/Reading/EES GSiebert/edw/28Mar79

2,4,5-T (2,4,5-Trichlorophenoxyacetic Acid)

#### SUSPENDED USES

Forestry Right-of-Way Pasture (a)

#### PERMITTED USES

Only remaining registered uses are those on rice and range (b)

#### **SILVEX**

#### (2,4,5-TP;2-(2,4,5-Trichlorophanoxy) Propionic Acid)

#### SUSPENDED USES

Forestry Right-of-Way Pasture (a) Home and Garden Commercial/Ornamental Turf (Including use in recreational areas) Aquatic Weed Control/Ditch Bank

#### PERMITTED USES

Only remaining registered uses are those on rice, range (b) sugarcane, and preharvest fruit drop of apples, prunes, and pears

(a) Pasture is defined as land producing forage for animal consumption, harvested by grazing, which has annual or more frequent cultivation, seeding, fertilization, irrigation, pesticide application, and other similar practices applied to it. Fancerows enclosing pastures are included as part of the pasture.

(b) Range is defined as non-pasture grazing land on which forage is produced through native species, or on which introduced species are managed as native species. This precludes land on which regular cultural practices of the nature contained in the pasture definition. Among the available herbicides which can be used as substitutes for suspended uses of 2,4,5-T and silvex are:

SUSPENDED USE	SUBSTITUTES FOR 2,4,5-T	SUBSTITUTES FOR SILVEX
Forestry	picloram, 2,4-D, fosamine, glyphosate	2,4-D picloram, etrazine, banvel, dicamba
Right-of-Way	dicamba, 2,4-D, picioram dichlorprop	Bichlorprop, 2,4;D, pictoram
Pasture	picioram, dicamba, 2,4-D	picloram, 2,4-D dicamba
Commercial/Ornamental Turf		2,4-D, HCPP, dicamba
Home & Garden		2,4-D, HCPP, dicamba
Aquatic Weed Control*/ Ditch_Bank		2,4-D, diquat, endothal, dichlobenii

AThe Argentina fiss bestle is an effective biological control of alligator weed when used in an IPM program with 2,4-D.

PM 5.5

KAR 13 KAR 13 1979

9 MAR 1979

MEMORANDUM FOR DEPUTY FOR ENVIRONMENT, SAFETY, AND OCCUPATIONAL HEALTH, DASA(116FM) DEPUTY UNDER SECRETARY OF THE MAVY DEPUTY FOR ENVIRONMENT AND SAFETY, SAF/HIQ DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: Suspension of 2, 4, 5-T Usage

This is to forward for your immediate action the enclosed Environmental Protection Agency's (EPA) press release and the stop sale, use, and removal order of March 1, 1979, concerning the suspension of many uses of the herbicide 2, 4, 5-T.

EPA's emergency suspension order takes effect immediately for many uses of the herbicides 2, 4, 5-T and slives. During the suspension period, the sale, distribution, and use of those herbicides to control weeds on rights-of-way and pastures, and to manage forest lands are prohibited. 2, 4, 5-T may, however, continue to be used on rangelands.

I recommend that you suspend immediately those uses of 2, 4, 5-Y and silvex which are prohibited specifically in the enclosed stop sale use, and removal order.

At this juncture, there should be no DoD action to dispose of those herbicides. It is possible that a court injunction may stop EPA's suspension proceedings.

The Armed Forces Pest Control Board will provide you with additional information as it becomes available.

Sad. Webers Marienthal

Enclosures

George Harienthal Deputy Assistant Secretary of Defense (Energy, Environment & Safety)

CC: AFPCB

MR/Reading/EES GSiebert/edw/8Mar79