

DEGESCH America, Inc. Newsletter

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Issue XX

EPA Seeks to Limit Use of Sulfuryl Fluoride

DTC Solutions Insect Monitor Pheromone Trap

Response from Dow AgroSciences LLC

Meetings & Conventions

EPA Announces ProFume® Phase-out

“The U.S. Environmental Protection Agency has re-evaluated the current science on fluoride and is taking steps to begin a phased-down withdrawal of the pesticide sulfuryl fluoride, a pesticide that breaks down into fluoride and is commonly used in food storage and processing facilities. Sulfuryl fluoride is currently registered for the control of insect pests in stored grains, dried fruits, tree nuts, coffee and cocoa beans, and for use in food handling and processing facilities. Although sulfuryl fluoride residues in food contribute only a very small portion of total exposure to fluoride, when combined with other fluoride exposure pathways, including drinking water and toothpaste, EPA has concluded that the tolerance (legal residue limits on food) no longer meets the safety standard under the Federal Food, Drug, and Cosmetic Act (FFDCA) and the tolerances for sulfuryl fluoride should be withdrawn.”

The United States EPA Office of Pesticide Programs issued this notice of withdrawal after an updated evaluation of the risks associated with sulfuryl fluoride indicated that some individuals might be exposed to excessive levels of fluoride.

“In their review of fluoride in drinking water released March 2006, the National Research Council (NRC) of the National Academies of Science (NAS) recommended that EPA update its fluoride risk assessment to include new data on health risks and better estimates of total exposure. To address these recommendations, EPA’s Office of Water has completed new assessments that consider health effects data on skeletal and dental fluorosis and also update exposure estimates to reflect current conditions. OPP has built upon the work of OW by updating its human health risk assessment for sulfuryl fluoride based on the new OW dose-response and relative source contribution documents and using the more sensitive health endpoint of severe dental fluorosis, as recommended by the NRC.”

Sulfuryl fluoride was initially registered in 1959 under the trade name Vikane® as a fumigant to control termites in wooden structures. The Montreal Protocol determination that methyl bromide was an ozone depletor and the subsequent call for alternative products led Dow AgroSciences LLC to seek registration of sulfuryl fluoride for control of insect pests in harvested and processed foods as well as food handling and processing facilities under the trade name ProFume®. Since fluoride can be left in residual amounts on food products treated with sulfuryl fluoride, EPA established tolerances for the maximum amount of residual fluoride allowed on food products treated with sulfuryl fluoride in 2004. Shortly after the tolerances for fluoride were announced the Fluoride Action Network (FAN) filed an objection. In response to the FAN belief that these new tolerances were unsafe as defined in the Federal Food, Drug, and Cosmetic Act (FFDCA), EPA’s Office of Pesticide Programs (OPP) has updated its assessment of the risks of sulfuryl fluoride.

“To ensure transparency in this action, EPA is making the proposed order responding to the Fluoride Action Network’s objections, the draft assessment, and the draft impact assessments available for a 90-day public comment period. The documents are available in docket number [EPA-HQ-OPP-2005-0174](#).”

Source- EPA website

Dow AgroSciences LLC Response Announced ProFume® Phase-out

Why is EPA doing this?

- EPA believes that certain segments of the public have too much fluoride (F) exposure and that excess F exposure can lead to “severe dental fluorosis” (SDF), a condition potentially involving pitting of the teeth. For the first time EPA now believes SDF is an “adverse health effect”.
- Based on EPA’s legal interpretation of the controlling federal statute, the Agency believes it cannot legally grant/defend food tolerances under these conditions.
- EPA feels compelled to do this now because activists have threatened to sue the Government in an attempt to enforce their own interpretation of the law.

• Perspective

Here are some important facts to keep in mind.

- First and foremost, this is a proposal to phase out food tolerances for ProFume® that will have to play out over time.
- Second, stakeholders will have an opportunity to submit comment to the Agency on the proposal, and we ask them to do so – to explain to EPA in plain terms why they need ProFume® and how their operations would be affected without it.
- Third, neither public health nor environmental protection support this Agency proposal. The vast majority of human exposure to fluoride comes from a) fluoridation of water for health-related purposes, b) naturally occurring fluoride in water in certain geographic areas and c) toothpaste.
- Fourth, by worst-case estimate the contribution from all food-related uses of ProFume® combined is negligible (i.e., no more than two to three percent of total human fluoride exposure). As noted in the EPA quote that follows, if the Agency hoped to reduce fluoride exposures, no regulatory decision related solely to ProFume could credibly advance that goal.
“Use of sulfuric fluoride is responsible for a tiny fraction of aggregate fluoride exposure... Elimination of sulfuric fluoride does not solve, or even significantly decrease, the fluoride aggregate exposure problems identified earlier.” Federal Register Notice January 10, 2011.
- Fifth, food contaminated by insects, rodents and related pests poses a clear threat to public health. Fumigation is the most cost-effective, reliable and rapid means of eliminating these pests from food and the facilities where food is processed or stored. So not only would phasing out food tolerances for ProFume offer no health, safety or environmental basis, it would actually remove a technology from use that is currently providing a demonstrable public health benefit.

Dow AgroSciences Position

- Dow AgroSciences is extremely disappointed in EPA’s proposal to phase out food tolerances for ProFume® over the next few years. EPA’s proposed action offers no meaningful public health or environmental benefit – and actually even detracts from public health goals.
- What’s more, the U.S. Department of Health and Human Services has already said that in a recent response to increased reports of minor dental fluorosis it is actively considering reducing acceptable fluoride levels in drinking water. Government assessments have shown that drinking water is a primary source of public fluoride exposure and that exposures resulting from the use of ProFume are, in comparison, negligible.
- What EPA has announced is a proposal, for public comment – not a final action. EPA will decide what action to take after evaluating the public comments received on this proposal. Dow AgroSciences is committed to working with industry stakeholders and government to address issues raised by the proposal so that ProFume can continue to meet critical needs of the postharvest industry.
- We believe that there are critical public health and environmental reasons why the practical means of protecting the food supply offered by use of ProFume® and the food tolerances associated with them should be maintained.

*Quoted from a Dow AgroSciences document released January 10, 2011
in response to EPA’s announced phase-out of Profume® fumigant.*

DTC Solutions Insect Monitor Pheromone Trap



Introducing.....

“Insect Monitor”

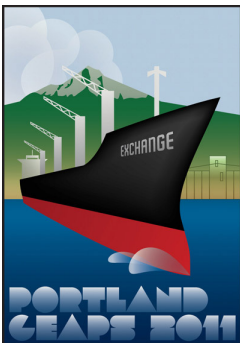
- **Pre-baited**
No lures to handle
- **Non-toxic**
Safe for all manufacturing environments
- **Easy to Use**
Starts working when removed from the package

For the last 18 months, DEGESCH America, Inc. has been testing a new pheromone trap designed to meet the needs of our customers. The “Insect Monitor” is designed to attract Stored Product Moths, Cigarette Beetles and Warehouse Beetles. This ready to use trapping system can be hung as is, placed in a guard to prevent damage or folded to make a pyramid style trap.

Currently in production, the first units should be available for purchase around March 15, 2011.



Grain Elevator and Processing Society (GEAPS)



**GEAPS Exchange 2011
Feb. 26 -Mar. 1, 2011
Oregon Convention Center
Portland, Oregon**

After a 30 year absence, the Grain Elevator and Processing Society returns to Portland

Exchange 2011, GEAPS’ 82nd annual international technical conference and exposition, will bring GEAPerS from around the world to beautiful Portland, Ore. Just west of the snow-capped Cascade Range and a short drive from the Pacific Ocean, Portland is a top vacation destination. So just think; we get to enjoy professional development and a scenic location in the same trip. (Two for the price of one!) **Source-GEAPS website**

**DEGESCH America, Inc. will be exhibiting at Exchange 2011
Visit us at Booth 511**

2011 Degesch America, Inc. Recertification School

Degesch America, Inc. Recertification School

Thursday, April 28, 2011

Stonewall Jackson Hotel

Staunton, VA

The agenda for the 2011 Degesch America, Inc. Recertification School has been finalized. The seminar is scheduled for Thursday, April 28, 2011 and will be held at the Stonewall Jackson Hotel in Staunton, VA.

Visit www.degeschamerica.com for Registration Information

- **Welcome & Opening Comments**
Herb Yeaman, V.P. of Marketing & Sales - DEGESCH America, Inc.
- **Legal Aspects & Updates on Pesticide Laws and Regulation**
Jeff Rogers, Environmental Program Planner - VDACS Office of Pesticide Management
- **Integrated Pest Management in Food Processing Plants** – Actual food-plant examples (case studies) to show the basic principles of IPM. Also includes hands-on insect identification.
Mike Holcomb, President - Technical Directions, Inc.
- **Structural Fumigations**
Mike McLean, Division Manager, DEGESCH America, Inc. - Portland
- **Pesticide Safety, Monitoring & Storage**
Robert Blachly, Executive Vice President - The Industrial Fumigant Company
- **Regulatory Update**
Meredith Laws – EPA Office of Pesticide Programs
- **The Penetrators: Fogging to Fumigation** – What are the Penetrators? Basics of Fogging Insecticides; Proper Applications; Products Available; Basics of Fumigation; Fumigant Products Available; The Future.....
Ed Hosoda, President – Cardinal Professional Products
- **Profume Gas Fumigant** – Fumigation Safety Considerations and Picking the Right Dosage
Joy Rogers Phillips, Senior Account Manager - Dow AgroSciences LLC
- **Ship and Various Commodity Fumigations; Tarping & Sealing Techniques for a Successful Fumigation**
Discussions for various strategies and techniques of commodity fumigations to include specific fumigants and commodities.
Brian Bartlett, Assistant Division Manager - Degesch America, Inc. - New Orleans
Bartek Drewnowski, Division Manager – Degesch America, Inc. - Richmond

International Association of Operative Millers (IAOM)

115th Annual Conference & Expo

May 2-6, 2011

Henry B. Gonzalez Convention Center

San Antonio, Texas

Emergency Contact Numbers

For Chemical Spills or Emergencies: Chemtrec - (800) 242-9300
For Human or Animal Medical Emergencies: Prosar - (800) 308-4856