Re: Hwy 36 - Retail food as a possible source of exposure

Elizabeth Allen to: Douglas Jae P 12/08/2011 02:19 PM

Cc: "BORISENKO Aaron", Alan Henning, "bermanf@ohsu.edu", "KNOTTS Bradley A", "BOLING Brian", "POKARNEY Bruce A", "STONE CHRISTINE L", "BAYHAM Chris", "MITCHELL Dale L", "LORENZ Dave C", "FARRER DAVID G", "'Dale

Hi Jae,

from the CSM that we originally put together, without the references:

Tolerances and food and feed additive regulations have been established for residues of 2,4-D in a variety of raw agricultural commodities such as apples, pears, and quinces, 5 parts per million (ppm); apricots, 5 ppm; citrus fruits, 5 ppm; and potatoes, 0.2 ppm (U.S. EPA, 2005; HSDB, 2005). In human foods derived from fruits, grasses, grains, nuts, vegetables, sugarcane, cotton, hops, and asparagus tolerances for 2,4-D were set at 0.1 ppm to 5 ppm; processed products of sugarcane (5 ppm) and grains (2 ppm); fish and shellfish at 1.0 ppm and potable water at 0.1 ppm (U.S. EPA, 2004c). In 27 tests for 2,4-D residues in soybeans performed in Arkansas, Illinois, Louisiana, Missouri, and Tennessee, 2,4-D was nondetectable (< 0.01 ppm) in all samples of forage, as well as seeds from soybeans treated with a preplant application of 2,4-D (acid, ester or amine) at 0.5, 1.25 and 2.75 lbs active ingredient per acre (up to 5.5 times the normal rate). Residues of 2,4-D were also nondetectable in the majority of hay samples (21 out of 27) from the same tests (U.S. EPA, 2004d). Testing results for 2,4-D residues in food are broadly discussed in the WHO Pesticide Residues Series 4 (INCHEM, 2008). The data showed that pre-harvest use of 2,4-D on citrus and potatoes resulted in low residues (<0.01 mg/kg on citrus and <0.01 mg/kg in potatoes). Post-harvest applications on lemons resulted in residues of < 2 mg/kg. Low levels of 2,4-D residues were also found in the milk of cows fed rations containing high levels of 2,4-D (1,000 mg/kg) in their diet.

However, I'd caution against a blanket conclusion that the produce in Eugene is the same as other locations. I'd suspect that Safeway would look to keep both transportation costs and spoilage potential to a minimum, and probably use as close a source as they can. We could also check with Safeway, but I think the company also has a policy of buying produce as locally as possible. (b) (6) [redacted]

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"Douglas Jae P" Hi All, First I want to thank you all for your quick... 12/08/2011 01:41:34 PM

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Date: 12/08/2011 01:41 PM
Subject: Hwy 36 - Retail food as a possible source of exposure

Hi All,
First I want to thank you all for your quick and thoughtful responses to the recent quick turnaround requests I've made for comments on various documents. I'm confident that, although it slows the process just a bit, it makes for a better product and outcome as we continue to proceed along in this investigation.

One topic came up several times in the comments we received back that I'd like to take just a moment to address - having to do with including, or not, retail food as an exposure pathway in this investigation. A few folks pointed out that commercial agricultural products (cereals and grains) found in retail grocery stores like Safeway frequently have detectible concentrations of pesticides that could be a significant source of exposure for community members.

We agree that this is a likely source of exposure for lots of people in the general population. However, we are not pursuing testing of these source pathways for this investigation because we feel that using NHANES as the referent population controls for those types of exposure. There is no reason to believe that commodities from the Safeway in Chicago have significantly different residual levels of pesticides than those from the Safeway in Eugene, OR. In addition it appears that most of our baseline urine results for community members around Triangle Lake are not significantly different than U.S. population in general (as reported in NHANES), we assume that their sources of exposure are likely similar to that of other people in the U.S. who participated in NHANES, which probably includes store bought foods.

While we're not testing these commodities in the EI, we will be sure to address the reason(s) why we are not during the reporting out of results.

Again, thanks for your support and responsiveness,
Jae

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