

**Date:** March 24, 2009

**Calculator:** James Schmidt (updated GMAVs due to species variability)

### SECONDARY VALUES FOR 2,4-D (CAS No. 94-75-7)

A search was conducted for information on the chemical properties and toxicity of 2,4-D to human health and to fish and aquatic life using the following databases and search engines: ECOTOX (toxicity to fish and aquatic life), IRIS (Integrated Risk Information System; toxicity to human health), CHEMFATE (environmental fate), BIODEG (degradation), HSDB (Hazardous Substances Data Bank), CCRIS (Chemical Carcinogenesis Research Info System), ATSDR ToxFAQs (Agency for Toxic Substances and Disease Registry chemical fact sheets), and EXTOXNET (Extension Toxicology Network's pesticide information project). This search yielded some useful information on 2,4-D's properties and toxicity.

#### Fish and Aquatic Life Secondary Values

To derive an acute toxicity criterion for fish and aquatic life, acute toxicity test results are required for at least one species in each of eight different families. Specific requirements and the data available to meet these requirements are found in Table 1. Following a search for information on the toxicity of 2,4-D to fish and other aquatic life, it was determined that data are available to meet all eight of the requirements. Although all requirements for calculation of criteria have been met, and no adjustment factors were used, the calculated acute criteria will be referred to as secondary values until such time that NR 105 can be revised to reflect the update.

#### Cold Water

Genus mean acute values (GMAV; geometric mean of SMAVs), ordered from high to low and ranked (1 for the lowest, and 21 for the highest) are found below. The cumulative probability (P) was calculated for each GMAV as  $P=R/(N+1)$ .

Rank (R)	Species	GMAV ( $\mu\text{g/L}$ )	P
21	<i>Tinca tinca</i>	800,000	
20	<i>Ceriodaphnia dubia</i>	315,582	
19	<i>Anguilla rostrata</i>	300,600	
18	<i>Carassius auratus</i>	193,873.67	
17	<i>Lumbriculus variegatus</i>	122,200	
16	<i>Lepomis</i> sp.	7,400	
15	<i>Salvelinus namaycush</i>	67,788.23	
14	<i>Morone</i> sp.	52,952.81	
13	<i>Cyprinus carpio</i>	35,189.07	
12	<i>Fundulus diaphanus</i>	26,700	
11	<i>Poecilia reticulata</i>	24,305.74	
10	<i>Acanthocyclops vernalis</i>	8,720	
9	<i>Ictalurus punctatus</i>	7,000	

8	<i>Chironomus</i> sp.	6,538.93
7	<i>Simocephalus serrulatus</i>	4,900
6	<i>Pteronarcys californicus</i>	4,898.98
5	<i>Oncorhynchus</i> sp.	3,922.40
4	<i>Pimephales promelas</i>	3,789.82
3	<i>Daphnia</i> sp.	3,200
2	<i>Micropterus dolomieu</i>	3,100
1	<i>Gammarus fasciatus</i>	2,400

Using the four GMAVs with Ps closest to 0.05 (*Gammarus*, *Micropterus*, *Daphnia*, and *Pimephales*), the acute toxicity criterion (to be called a secondary acute value until promulgated) is calculated as follows:

$$\begin{aligned}
 \text{Let } EV &= \text{sum of the four ln GMAVs} \\
 &= \ln 2400 + \ln 3100 + \ln 3200 + \ln 3789.82 \\
 &= 7.7832 + 8.0391 + 8.0709 + 8.2401 \\
 &= 32.1334
 \end{aligned}$$

$$\begin{aligned}
 \text{Let } EW &= \text{sum of the four squares of the ln GMAVs} \\
 &= (7.7832)^2 + (8.0391)^2 + (8.0709)^2 + (8.2401)^2 \\
 &= 60.5782 + 64.6271 + 65.1395 + 67.8988 \\
 &= 258.2450
 \end{aligned}$$

$$\begin{aligned}
 \text{Let } EP &= \text{sum of the four Ps} \\
 &= 0.0454 + 0.0909 + 0.1364 + 0.1818 \\
 &= 0.4545
 \end{aligned}$$

$$\begin{aligned}
 \text{Let } EPR &= \text{sum of the four square roots of P} \\
 &= 0.2131 + 0.3015 + 0.3693 + 0.4264 \\
 &= 1.3103
 \end{aligned}$$

$$\begin{aligned}
 \text{Let } JR &= \text{square root of 0.05} \\
 &= 0.2236
 \end{aligned}$$

$$\begin{aligned}
 S &= ((EW - (EV)^2/4)/(EP - (EPR)^2/4))^{0.5} \\
 &= ((258.2450 - (32.1334)^2/4)/(0.4545 - (1.3103)^2/4))^{0.5} \\
 &= ((258.2450 - 258.1388)/(0.4545 - 0.4292))^{0.5} \\
 &= (0.1062/0.0253)^{0.5} \\
 &= (4.1976)^{0.5} \\
 &= 2.0554
 \end{aligned}$$

$$\begin{aligned}
 L &= (EV - S(EPR))/4 \\
 &= (32.1334 - 2.0554(1.3103))/4 \\
 &= (32.1334 - 2.6932)/4 \\
 &= 7.3600
 \end{aligned}$$

$$\begin{aligned}
 A &= (JR)(S) + L \\
 &= (0.2236)(2.0554) + 7.3600 \\
 &= 7.8196
 \end{aligned}$$

$$\begin{aligned}
 \text{Final Acute Value (FAV)} &= e^A \\
 &= e^{7.8196} \\
 &= 2488.91
 \end{aligned}$$

$$\begin{aligned}
 \text{ATC} &= \text{FAV}/2 \\
 &= 2,488.91/2 \\
 &= 1,244.45
 \end{aligned}$$

**ATC for Cold Water = 1,244 µg/L**

To derive a chronic toxicity criterion for fish and aquatic life, chronic toxicity test results are required for at least one species in each of eight different families. Specific requirements and the data available to meet these requirements are found in Table 2. Following a search for information on the toxicity of 2,4-D to fish and other aquatic life, it was determined that data are available to meet only one out of the eight requirements. However, it is still possible to calculate a secondary chronic value for 2,4-D.

To calculate a secondary chronic value (SCV), the final acute value (FAV) is divided by the secondary acute to chronic ratio (SACR). The FAV is equal to two times the acute toxicity criterion (ATC). The SACR is equal to the geometric mean of three species mean acute-chronic ratios (SMACRs), where each SMACR is equal to the species mean acute value (SMAV) divided by the species mean chronic value (SMCV).

Because chronic toxicity data are available for *Ceriodaphnia dubia*, the SACR was calculated using these data and two default ratios.

$$\begin{aligned}
 \text{SMAV for } C. \text{ } dubia &= 315,582 \text{ } \mu\text{g/L} \\
 \text{SMCV for } C. \text{ } dubia &= 33,720.02 \text{ } \mu\text{g/L}
 \end{aligned}$$

$$\begin{aligned}
 \text{SMACR for } C. \text{ } dubia &= 315,582/33,720.02 = 9.36 \\
 \text{SMACR 2} &= 18 \text{ (default)} \\
 \text{SMACR 3} &= 18 \text{ (default)}
 \end{aligned}$$

$$\text{SACR} = \text{geometric mean of } 9.36, 18, \text{ and } 18 = 14.47$$

$$\text{Cold Water ATC for 2,4-D} = 1,224 \text{ } \mu\text{g/L}$$

$$\text{FAV} = (2)(1,224 \text{ } \mu\text{g/L}) = 2,448 \text{ } \mu\text{g/L}$$

$$\begin{aligned}
 \text{SCV} &= \text{FAV/SACR} \\
 &= 2,488.91 \text{ } \mu\text{g/L} / 14.47 \\
 \text{SCV} &= 172 \text{ } \mu\text{g/L}
 \end{aligned}$$

For the other classifications, the most sensitive genera are offset by the reduced number of genera in the database such that the calculated criteria are lower than the coldwater criterion. As a result, no relaxed acute criteria or chronic values are allowable for those waters, and the coldwater numbers shall be applied to all Wisconsin waters.

Table 1. Requirements for calculation of an acute toxicity criterion for protection of aquatic life for 2,4-D, and corresponding acute toxicity data.

Species Name	Common Name	Duration/ Endpoint	Value µg/L	Reference # <sup>a</sup>	Source
1. At least one salmonid fish in the family Salmonidae, in the class Osteichthyes.					
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	64,000	15	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	41,500	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	64,000	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	41,500	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	67,000	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	130,000	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	40,000	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	43,500	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	169,000	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	172,000	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	44,000	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	37,000	17	AQUIRE
<i>Oncorhynchus clarki</i>	cutthroat trout	96-h/LC50	24,500	17	AQUIRE
Species Mean Acute Value (SMAV) = 59,759.17					
SMAV was excluded because it was more than 10 times the SMAV for rainbow trout (see below)					
# <i>Oncorhynchus mykiss</i>	rainbow trout	96-h/LC50	358,000	16	AQUIRE
<i>Oncorhynchus mykiss</i>	rainbow trout	96-h/LC50	3,100	15	AQUIRE
<i>Oncorhynchus mykiss</i>	rainbow trout	96-h/LC50	3,200	15	AQUIRE
<i>Oncorhynchus mykiss</i>	rainbow trout	96-h/LC50	1,400	15	AQUIRE
<i>Oncorhynchus mykiss</i>	rainbow trout	96-h/LC50	7,600	15	AQUIRE
<i>Oncorhynchus mykiss</i>	rainbow trout	96-h/LC50	47,000	15	AQUIRE
# <i>Oncorhynchus mykiss</i>	rainbow trout	96-h/LC50	358,000	12	AQUIRE
# <i>Oncorhynchus mykiss</i>	rainbow trout	96-h/LC50	110,000	17	AQUIRE

# Results were excluded because there was more than 10 times variability within the database. Based on results for other species, it is assumed the lower LC50 values are more accurate and/or representative.

SMAV = 3,205.26 (4 results)

<i>Oncorhynchus tshawytscha</i>	Chinook salmon	95-h/LC50	4,800	15	AQUIRE
		SMAV = 4,800			

Genus Mean Acute Value (GMAV), *Oncorhynchus* sp. = 3,922.40

<i>Salvelinus namaycush</i>	lake trout	96-h/LC50	45,000	15	AQUIRE
<i>Salvelinus namaycush</i>	lake trout	96-h/LC50	65,700	17	AQUIRE
<i>Salvelinus namaycush</i>	lake trout	96-h/LC50	44,500	17	AQUIRE
<i>Salvelinus namaycush</i>	lake trout	96-h/LC50	64,000	17	AQUIRE
<i>Salvelinus namaycush</i>	lake trout	96-h/LC50	62,000	17	AQUIRE
<i>Salvelinus namaycush</i>	lake trout	96-h/LC50	105,000	17	AQUIRE
<i>Salvelinus namaycush</i>	lake trout	96-h/LC50	120,000	17	AQUIRE
		SMAV = 67,788.23			

2. At least one non-salmonid fish from another family in the class Osteichthyes, preferably a commercially or recreationally important warmwater species.

<i>Ictalurus punctatus</i>	channel catfish	96-h/LC50	7,000	15	AQUIRE
		SMAV = 7,000			

<i>Lepomis gibbosus</i>	pumpkinseed	96-h/LC50	94,600	2	AQUIRE
		SMAV = 94,600			

SMAV was excluded because it was more than 10 times the SMAV for bluegill (see below)

# <i>Lepomis macrochirus</i>	bluegill	96-h/LC50	263,000	16	AQUIRE
<i>Lepomis macrochirus</i>	bluegill	96-h/LC50	7,400	15	AQUIRE
# <i>Lepomis macrochirus</i>	bluegill	96-h/LC50	263,000	12	AQUIRE
# <i>Lepomis macrochirus</i>	bluegill	96-h/LC50	180,000	17	AQUIRE

# Results were excluded because there was more than 10 times variability within the database. Based on results for other species, it is assumed the lower LC50 values are more accurate and/or representative.

SMAV = 7,400

GMAV, *Lepomis* sp. = 7,400

*Micropterus dolomieu*  
SMAV = 3,100

96-h/LC50  
15

96-h/LC50

smallmouth bass

*Morone americana*  
SMAV = 40,000

96-h/LC50  
2

96-h/LC50

white perch

*Morone saxatilis*  
SMAV = 70,100

96-h/LC50  
2

96-h/LC50

striped bass

GMAV, *Morone* sp. = 52,952.81

3. At least one planktonic crustacean (e.g., cladoceran, copepod).

*Ceriodaphnia dubia*  
*Ceriodaphnia dubia*  
SMAV = 315,582

48-h/LC50  
>422,000

48-h/LC50

water flea

*Daphnia magna*  
*Daphnia magna*  
SMAV = 50,000

48-h/EC50  
>100,000

48-h/EC50

water flea

25,000  
11

25,000  
12

*SMAV was excluded because it was more than 10 times the SMAV for *D. pulex* (see below)*

*Daphnia pulex*  
*Daphnia pulex*  
SMAV = 3,200

48-h/EC50  
3,200

48-h/EC50  
3,200

water flea

3,200  
13

3,200  
14

GMAV, *Daphnia* sp. = 3,200

*Acanthocyclops vernalis*  
AQUIRE

96-h/EC50  
1

96-h/EC50

SMAV = 8,720

*Simocephalus serrulatus* water flea 48-h/EC50 4,900 13 AQUIRE  
SMAV = 4,900

4. At least one benthic crustacean (e.g., ostracod, isopod, amphipod, crayfish).  
*Gammarus fasciatus* scud 96-h/LC50 2,400 15 AQUIRE  
SMAV = 2,400

5. At least one insect (e.g., mayfly, dragonfly, damselfly, stonefly, caddisfly, mosquito, midge).  
*Chironomus* sp. midge 48-h/LC50 11,020 6 AQUIRE  
*Chironomus* sp. midge 48-h/LC50 3,880 6 AQUIRE  
SMAV = 6,538.93

6. At least one fish or amphibian from a family in the phylum Chordata not already represented in one of the other subdivisions.  
*Carassius auratus* goldfish 96-h/LC50 >187,000 3 AQUIRE  
*Carassius auratus* goldfish 96-h/LC50 >201,000 3 AQUIRE  
SMAV = 193,873.67

*Cyprinus carpio* common carp 96-h/LC50 96,500 2 AQUIRE  
*Cyprinus carpio* common carp 96-h/LC50 5,100 7 AQUIRE  
*Cyprinus carpio* common carp 96-h/LC50 15,300 7 AQUIRE  
*Cyprinus carpio* common carp 96-h/LC50 20,000 7 AQUIRE  
*Cyprinus carpio* common carp 96-h/LC50 24,150 7 AQUIRE  
*Cyprinus carpio* common carp 96-h/LC50 31,250 7 AQUIRE  
*Cyprinus carpio* common carp 96-h/LC50 20,000 8 AQUIRE  
*Cyprinus carpio* common carp 96-h/LC50 134,800 9 AQUIRE  
*Cyprinus carpio* common carp 96-h/LC50 270,000 10 AQUIRE  
*Anguilla rostrata* American eel 96-h/LC50 300,600 2 AQUIRE  
SMAV = 35,189.07

NOTE: Although the LC50's varied by more than a factor of 10, they were all still within 1/10 – 10X the mean. It wasn't clear which ones to drop out, so rather than exclude data on a forage fish, it was decided to use the SMAV based on all the results.

SMAV = 300,600

*Fundulus diaphanus* banded killifish 96-h/LC50 26,700 2 AQUIRE

SMAV = 26,700

# *Pimephales promelas*  
*Pimephales promelas*  
*Pimephales promelas*  
*Pimephales promelas*  
# *Pimephales promelas*  
# *Pimephales promelas*

fathead minnow  
fathead minnow  
fathead minnow  
fathead minnow  
fathead minnow  
fathead minnow  
fathead minnow

96-h/LC50  
96-h/LC50  
96-h/LC50  
96-h/LC50  
96-h/LC50  
96-h/LC50  
96-h/LC50

263,000  
2,700  
2,400  
8,400  
320,000  
133,000  
17

AQUIRE  
AQUIRE  
AQUIRE  
AQUIRE  
AQUIRE  
AQUIRE  
AQUIRE

# Results were excluded because there was more than 10 times variability within the database. Based on results for other species, it is assumed the lower LC50 values are more accurate and/or representative.  
**SMAV = 3789.82**

*Poecilia reticulata* guppy 96-h/LC50 70,700 2 AQUIRE  
*Poecilia reticulata* guppy 96-h/LC50 8,356 19 AQUIRE

SMAV = 24,305.74

*Tinca tinca* tench 96-h/LC50 800,000 22 AQUIRE  
SMAV = 800,000

7. At least one organism from a family in a phylum other than Arthropoda or Chordata (e.g., Rotifera, Annelida, Mollusca).  
*Lumbriculus variegatus* oligochaete, worm 96-h/LC50 122,200 18 AQUIRE  
SMAV = 122,200

8. At least one organism from a family in any order of insect or any other phylum not already represented in subdivisions 1 through 7.  
*Pteronarcys californicus* stonefly 96-h/LC50 15,000 20 AQUIRE  
*Pteronarcys californicus* stonefly 96-h/LC50 1,600 21 AQUIRE  
SMAV = 4,898.98

Robertson, E.B. and D.L. Bunting. 1976. The acute toxicity of four herbicides to 0-4 hour nauplii of *Cyclops vernalis* Fisher (Copepoda: Cyclopoida). Bulletin of Environmental Contamination and Toxicology 16(6):682-688.

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- <sup>3</sup>Birge, W.J., J.A. Black, and D.M. Bruser. 1979. Toxicity of organic chemicals to embryo-larval stages of fish. EPA-560/11-79-007, U.S. EPA, Washington, D.C. 60 pp.
- <sup>4</sup>Oris, J.T., R.W. Winner, and M.V. Moore. 1991. A four-day survival and reproduction toxicity test for *Ceriodaphnia dubia*. Environmental Toxicology and Chemistry 10(2):217-224.
- <sup>5</sup>Nelson, S.M. and R.A. Roline. 1998. Evaluation of the sensitivity of rapid toxicity tests relative to daphnid acute lethality tests. Bulletin of Environmental Contamination and Toxicology 60:292-299.
- <sup>6</sup>Vardia, H.K. and P.S. Rao. 1986. Pesticidal effects on chironomid larvae. Rev. Biol. (Lisb.) 13(1-4):113-115.
- <sup>7</sup>Vardia, H.K. and V.S. Durve. 1981. The toxicity of 2,4-D to *Cyprinus carpio* var. communis in relation to the seasonal variation in the temperature. Hydrobiologia 77(2):155-159.
- <sup>8</sup>Vardia, H.K. and V.S. Durve. 1981. Bioassay study on some freshwater fishes exposed to 2,4-dichlorophenoxyacetic acid. Acta Hydrochim. Hydrobiol. 9(2):219-223.
- <sup>9</sup>Sarkar, S.K. 1990. Acute toxicity of herbicide 2,4-D on common carp fry *Cyprinus carpio*. Environmental Ecology 8(4):1316-1318.
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- <sup>11</sup>Sanders, H.O. 1970. Toxicities of some herbicides to six species of freshwater crustaceans. Journal of Water Pollution Control Federation 24(8):1544-1550.
- <sup>12</sup>Office of Pesticide Programs. 2000. Environmental Effects Database (EEDB). Environmental Fate and Effects Division, U.S. EPA, Washington, D.C.
- <sup>13</sup>Sanders, H.O. and O.B. Cope. 1966. Toxicities of several pesticides to two species of cladocerans. Trans. Am. Fish. Soc. 95(2):165 -169.
- <sup>14</sup>Cope, O.B. 1966. Contamination of the freshwater ecosystem by pesticides. J. Appl. Ecol. 3:33-44.
- <sup>15</sup>Johnson, W.W. and M.T. Finley. 1980. Handbook of acute toxicity of chemicals to fish and aquatic invertebrates. Resource Publication 137, U.S. Department of Interior, U.S. Fish and Wildlife Service, Washington, D.C. 98 pp.
- <sup>16</sup>Alexander, H.C., F.M. Gersich, and M.A. Mayes. 1985. Acute toxicity of four phenoxy herbicides to aquatic organisms. Bull. Environ. Contam. Toxicol. 35(3):314-321.
- <sup>17</sup>Mayer, F.L.J. and M.R. Ellersiek. 1986. Manual of acute toxicity: Interpretation and data base for 410 chemicals and 66 species of freshwater animals. Resource Publication No. 160. U.S. Department of Interior, U.S. Fish and Wildlife Service, Washington, D.C. 505 pp.
- <sup>18</sup>Bailey, H.C. and D.H.W. Liu. 1980. *Lumbriculus variegatus*, a benthic oligochaet, as a bioassay organism. In: J.C. Eaton, P.R.

- Parrish, and A.C. Hendricks (Eds.), Aquatic Toxicology and Hazard Assessment, 3<sup>rd</sup> Symposium, ASTM STP 707, Philadelphia, PA:205-215.
- <sup>19</sup>Vardia, H.K. and V.S. Durve. 1984. Relative toxicity of phenoxy herbicides on *Lebiasina* (*Poecilia*) *reticulatus* (Peters). Proc. Indian Acad. Sci. Anim. Sci. 93(7):691-695.
- <sup>20</sup>Sanders, H.O. and O.B. Cope. 1968. The relative toxicities of several pesticides to naiads of three species of stoneflies. Limnol. Oceanogr. 13(1):112-117.
- <sup>21</sup>Cope, O.B. 1965. Sport fishery investigations. In: Effects of Pesticides on Fish and Wildlife, U.S. Department of Interior, U.S. Fish and Wildlife Service Circular 226:51-63.
- <sup>22</sup>Gomez, L., J. Masot, S. Martinez, E. Duran, F. Soler, and V. Roncero. 1998. Acute 2,4-D poisoning in tench (*Tinca tinca* L.): Lesions in the hematopoietic portion of the kidney. Arch. Environ. Contam. Toxicol. 35(3):479-483.

Table 2. Requirements for calculation of a chronic toxicity criterion for protection of aquatic life for 2,4-D, and corresponding chronic toxicity data.

Species Name	Common Name	Duration/ Endpoint	Value µg/L	Reference # <sup>a</sup>	Source
<hr/>					
1.	At least one salmonid fish in the family Salmonidae, in the class Osteichthyes.				
2.	At least one non-salmonid fish from another family in the class Osteichthyes, preferably a commercially or recreationally important warmwater species.				
3.	At least one planktonic crustacean (e.g., cladoceran, copepod).				
	<i>Ceriodaphnia dubia</i>	water flea	7-D/MATC	48,800	AQUIRE
	<i>Ceriodaphnia dubia</i>	water flea	7-D/MATC	23,300	AQUIRE
	SMCV = 33,720.02				
4.	At least one benthic crustacean (e.g., ostracod, isopod, amphipod, crayfish).				
5.	At least one insect (e.g., mayfly, dragonfly, damselfly, stonefly, caddisfly, mosquito, midge).				
6.	At least one fish or amphibian from a family in the phylum Chordata not already represented in one of the other subdivisions.				
7.	At least one organism from a family in a phylum other than Arthropoda or Chordata (e.g., Rotifera, Annelida, Mollusca).				
8.	At least one organism from a family in any order of insect or any other phylum not already represented in subdivisions 1 through 7.				
<hr/>					
Oris, J.T., R.W. Winner, and M.V. Moore. 1991. A four-day survival and reproduction toxicity test for <i>Ceriodaphnia dubia</i> . Environmental Toxicology and Chemistry 10(2):217-224.					

## HUMAN HEALTH

To calculate a criteria or secondary value for the protection of human health, it is first necessary to determine if the substance has been shown to be carcinogenic (which will result in the calculation of a human cancer criteria or secondary value) or not (which will result in the calculation of a human threshold criteria or secondary value). While increases in malignant tumors have been observed in rats exposed to 2,4-D, there is still insufficient evidence to classify 2,4-D as a carcinogen (National Institutes of Health, Hazardous Substances Database), and no cancer slope factor has been established (U.S. EPA, IRIS database). However, because an oral reference dose and a log octanol water partition coefficient are available, a human threshold secondary value can be calculated for 2,4-D.

There are several steps to calculating a human threshold secondary value: 1) calculation of the fraction of freely dissolved chemical; 2) calculation of the "baseline BAF"; 3) calculation of the "human health BAF"; and 4) calculation of the human threshold secondary value.

### **1) Calculation of the freely-dissolved fraction = $f_{fd}$**

Given a standard dissolved organic carbon (DOC) concentration of 0.000002 Kg/L and a particulate organic carbon (POC) concentration of 0.00000004 Kg/L in water, the equation

$$f_{fd} = 1/\{1 + [(DOC)(K_{ow})/10] + [(POC)(K_{ow})]\}$$

can be reduced to:

$$= 1/\{1 + [(0.00000024 \text{ Kg/L})(K_{ow})]\}$$

A log  $K_{ow}$  of 2.81 ( $K_{ow}$  of 645.6542) has been published for 2,4-D (National Institutes of Health, Hazardous Substances Database).

$$\begin{aligned} f_{fd} &= 1/\{1 + [(0.00000024 \text{ Kg/L})(645.6542)]\} \\ &= 1/1.000155 \\ &= \mathbf{0.9998} \end{aligned}$$

### **2) Calculation of the baseline BAF**

The baseline BAF is calculated according to the equations contained in 40 CFR part 132 (Final Water Quality Guidance for the Great Lakes System), Appendix B, using BAF data that was collected in one of four ways (listed in order of most preferred to least preferred):

- a) a measured BAF from a field study
- b) a predicted BAF based on field-measured BSAFs
- c) a predicted BAF using a laboratory-measured bioconcentration factor (BCF)  
and a food chain multiplier (FCM)
- d) a predicted BAF using a  $K_{ow}$  and a FCM

Currently, there are no acceptable BAFs, BSAFs, or BCFs available for 2,4-D; therefore, the baseline BAF was calculated using the  $K_{ow}$  and a food chain multiplier (method d above).

Given 2,4-D's  $\log K_{ow}$  of 2.81 ( $K_{ow}$  of 645.6542), the FCMs (taken from table B-1 in GLI) were interpolated to be 1.0208 for trophic level 3 (warm waters) and 1.005 for trophic level 4 (cold waters).

a) Cold Water

$$\begin{aligned}\text{Baseline BAF} &= (\text{FCM})(\text{Kow}) \\ &= (1.005)(645.6542) \\ &= \mathbf{648.8825}\end{aligned}$$

b) Warm Waters

$$\begin{aligned}\text{Baseline BAF} &= (\text{FCM})(\text{Kow}) \\ &= (1.0208)(645.6542) \\ &= \mathbf{659.0838}\end{aligned}$$

### 3) Calculation of the human health BAF

a) Cold Water

$$\text{BAF}^{HH}_{TL4} = \{[(\text{baseline BAF})(0.044)] + 1\} (f_{fd})$$

where

$\text{BAF}^{HH}_{TL4}$  = Human health BAF for trophic level 4 (cold water)

baseline BAF = the baseline BAF (for cold waters) calculated in 2)

0.044 = fraction lipid value for cold water fish and aquatic life communities

$f_{fd}$  = fraction freely dissolved

$$\begin{aligned}\text{BAF}^{HH}_{TL4} &= \{[(\mathbf{648.8825})(0.044)] + 1\} (0.9998) \\ &= \mathbf{29.5449}\end{aligned}$$

b) Warm Waters

$$\text{BAF}^{HH}_{TL3} = \{[(\text{baseline BAF})(0.013)] + 1\} (f_{fd})$$

where

$BAF^{HH}_{TL3}$  = Human health BAF for trophic level 3 (warm waters)

baseline BAF = the baseline BAF (for warm waters) calculated in 2)

0.013 = fraction lipid value for warm water fish and aquatic life communities

$f_{fd}$  = fraction freely dissolved

$$BAF^{HH}_{TL3} = \{[(\mathbf{659.0838})(0.013)] + 1\} (0.9998)$$

$$= \mathbf{9.5662}$$

#### 4) Calculation of the human threshold secondary value

$$\text{Human Threshold Secondary Value} = [(ADE)(70 \text{ Kg})(RSC)]/[W_H + (F_H)(BAF)]$$

where

ADE = acceptable daily exposure (= oral reference dose, or RfD; = 0.01 mg/Kg/day for 2,4-D (IRIS 2003))

70 Kg = average weight of an adult

RSC = relative source contribution to account for other routes of exposure (= 0.8 in the absence of other data)

$W_H$  = average per capita daily water consumption (= 2 L/d for public water supplies, and 0.01 L/d for non-public water supplies)

$F_H$  = average consumption of sport-caught fish in Wisconsin  
(= 0.02 Kg/d)

BAF = appropriate (cold or warm water) human health BAF calculated in 3.

##### a) Public Water Supply/Cold Water

$$\text{Human Threshold Secondary Value} = [(ADE)(70 \text{ Kg})(RSC)]/[W_H + (F_H)(BAF)]$$

$$= [(0.01 \text{ mg/Kg/d})(70 \text{ Kg})(0.8)]/[2 \text{ L/d} + (0.02 \text{ Kg/d})(\mathbf{29.5449 \text{ L/Kg}})]$$

$$= 0.2161 \text{ mg/L}$$

$$= 216.1 \mu\text{g/L}$$

**b) Public Water Supply/Warm Water Sportfish**

$$\begin{aligned}\text{Human Threshold Secondary Value} &= [(ADE)(70 \text{ Kg})(RSC)]/[W_H + (F_H)(BAF)] \\ &= [(0.01 \text{ mg/Kg/d})(70 \text{ Kg})(0.8)]/[2 \text{ L/d} + (0.02 \text{ Kg/d})(9.5662 \text{ L/Kg})] \\ &= 0.2555 \text{ mg/L} \\ &= 255.5 \mu\text{g/L}\end{aligned}$$

**c) Non-Public Water Supply/Cold Water**

$$\begin{aligned}\text{Human Threshold Secondary Value} &= [(ADE)(70 \text{ Kg})(RSC)]/[W_H + (F_H)(BAF)] \\ &= [(0.01 \text{ mg/Kg/d})(70 \text{ Kg})(0.8)]/[0.01 \text{ L/d} + (0.02 \text{ Kg/d})(29.5449 \text{ L/Kg})] \\ &= 0.9319 \text{ mg/L} \\ &= 931.9 \mu\text{g/L}\end{aligned}$$

**d) Non-Public Water Supply/Warm Waters (Warm Water Sportfish, Warm Water Forage Fish, and Limited Forage Fish designated waters)**

$$\begin{aligned}\text{Human Threshold Secondary Value} &= [(ADE)(70 \text{ Kg})(RSC)]/[W_H + (F_H)(BAF)] \\ &= [(0.01 \text{ mg/Kg/d})(70 \text{ Kg})(0.8)]/[0.01 \text{ L/d} + (0.02 \text{ Kg/d})(9.5662 \text{ L/Kg})] \\ &= 2.7819 \text{ mg/L} \\ &= 2,781.9 \mu\text{g/L}\end{aligned}$$

**e) Non-Public Water Supply/Limited Aquatic Life**

Note: The Limited Aquatic Life classification applies to water bodies with no (or very few) fish present. Therefore, calculation of a human health threshold value for water bodies with this classification does not include a human health BAF since it is assumed that humans will not be exposed to 2,4-D through consumption of fish in these areas.

$$\begin{aligned}\text{Human Threshold Secondary Value} &= [(ADE)(70 \text{ Kg})(RSC)]/[W_H + (F_H)(BAF)] \\ &= [(0.01 \text{ mg/Kg/d})(70 \text{ Kg})(0.8)]/[0.01 \text{ L/d} + (0)] \\ &= \mathbf{56} \text{ mg/L} \\ &= \mathbf{56,000} \text{ } \mu\text{g/L}\end{aligned}$$

Chemical	CAS #	Category	Type of Secondary Value	Water Body Classification	Value (µg/L)
2,4-D	94-75-7	Fish and Aquatic	Acute	Cold, WWSF	1,224
2,4-D	94-75-7	Fish and Aquatic	Chronic	Cold, WWSF	169
2,4-D	94-75-7	Fish and Aquatic	Acute	WWFF, LFF, LAL	1,268
2,4-D	94-75-7	Fish and Aquatic	Chronic	WWFF, LFF, LAL	175
2,4-D	94-75-7	Human Health	Human Threshold	Public Water Supply/Cold	216
2,4-D	94-75-7	Human Health	Human Threshold	Public Water Supply/WWSF	255
2,4-D	94-75-7	Human Health	Human Threshold	Non-Public Water Supply/Cold	932
2,4-D	94-75-7	Human Health	Human Threshold	Non-Public Water Supply/WWSF, WWFF, LFF	2,782
2,4-D	94-75-7	Human Health	Human Threshold	Non-Public Water Supply/LAL	56,000

Cold = cold water designated water bodies

WWSF = warm water sportfish designated water bodies

WWFF = warm water forage fish designated water bodies

LFF = limited forage fish designated water bodies

LAL = limited aquatic life designated water bodies (includes wetlands)