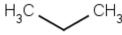
Propane

Crops

1	Identification of I	Petitioned Substance
2	Chemical Name:	
3	Propane	CAS Number:
4	Dimethyl methane	74-98-6
5		
6	Other Names:	Other Codes:
7	Propane, propyl hydride, bottled gas, liquefied	RTECS No. TX2275000
8	propane gas	
9		
0	Trade Names:	
1	Propane, n-propane	
2	Characterization of Petitioned Substance	
3		
4	Composition of the Substance:	
5		
6	Propane is an alkane consisting of three carbon and e	eight hydrogen atoms (molecular formula C_3H_8). The
7	molecular structure of propane, obtained from the H	lazardous Substances Data Bank (HSDB, 2007), is
8	shown as Figure 1.	
9		
0		
1	Figure 1. Molect	ular Structure of Propane
2		
-		



- 23 24 25

26 **Properties of the Substance:** 27

28 In its pure form, propane is an odorless gas. Propane may also be compressed into a liquid. It is a

29 constituent of natural gas and of crude petroleum and is isolated from these sources by a "stabilization 30 process" using fractional distillation under pressure. Propane is highly flammable and explosive. Potential

31 symptoms of overexposure are dizziness, confusion, excitation, and asphyxia. Direct contact with liquefied

32 propane may cause frostbite. When exposed to ambient temperatures, liquefied propane will boil and

33 evaporate rapidly (USDA, 2009a). Physical and chemical properties of propane are presented in Table 1.

34

35 Specific Uses of the Substance:

36

37 Propane is used primarily as a fuel gas and is sometimes mixed with butane and other gases in liquefied 38 petroleum gas (LPG). It is also used as a refrigerant and aerosol propellant (HSDB, 2007). Propane gas is 39 naturally odorless; however, the propane used for fuel purposes is often combined with a malodorant (e.g., 40 methyl mercaptan) that gives it the characteristic musty odor with which it is identified (USDA, 2009a).

41

42 Propane is used in devices to control animal pests, primarily burrowing animals such as prairie dogs,

43 gophers, moles, voles, squirrels, rabbits, groundhogs, armadillos, chipmunks, muskrats, shrews, rats,

- 44 mountain beaver, nutria, ground squirrels, badgers, pocket gophers, marmots, and bog lemmings (CCOF,
- 45 2010). Some of these devices are designed to collapse rodent tunnels and suffocate animals. Others (e.g.,

- 46 propane cannon) produce loud noises intended to scare away (but not kill) animal pests (PERC, undated).
- 47 Propane is also used in agriculture for thermal weed control (i.e., flame weeding) (Diver, 2002).

48

Tuble 1. Thyskul and Chemika Hoperices of Hopane		
Physical or Chemical Property	Value ^a	
Color	Colorless	
Physical state	Gas; may also be found as a compressed liquid	
Odor	Naturally odorless; manufacturers/processors add a substance	
	(usually methyl mercaptan) that gives propane the odor of rotten	
	eggs	
Molecular weight	44.10 g/mol	
Boiling point	-42.1°C (1 atm)	
Melting point	-187.6°C	
Solubility	Slightly soluble in acetone; soluble in ethanol; very soluble in	
	ethyl ether, benzene, chloroform	
Vapor pressure	7150 mm Hg (25°C)	
Vapor density	1.56 (0°C); heavier than air	
Density (compressed liquid propane)	0.493 g/cm ³ (25°C)	
Explosive limits	2.2-9.5% by volume in air	

Table 1. Physical and Chemical Properties of Propane

49 50

51

52 Approved Legal Uses of the Substance:

^aSources: HSDB, 2007, USDA, 2009a

53

In accordance with 21 CFR 184.1655 and 582.1655, propane is Generally Recognized as Safe (GRAS) when used for its intended purpose in food (as propellant, aerating agent, and gas [used to supply force to expel a product or used to reduce the amount of oxygen in contact with the food in packaging] and when used in accordance with good manufacturing practice

57 accordance with good manufacturing practice.

58

59 Propane is not a pesticide registered by EPA under Section 3 of the Federal Insecticide, Fungicide, and

Rodenticide Act (FIFRA). However, propane is used in devices that use only physical or mechanical means
 to control rodents, and such "pest control devices" are subject to some FIFRA requirements (U.S. EPA,

2011a). Examples of rodent control devices that use propane include Meyer Industries' Rodenator R3

63 (Meyer Industries, 2010) and products marketed as the Varmitgetter and the Rodent Blaster. Although

such devices may be subject to state or local pesticide regulation, these requirements were not identified for

this Technical Report. However, in Boulder, Colorado, it is illegal to destroy inhabited prairie dog

burrows; thus, propane-based pest control devices cannot be used within the city limits (City of Boulder,

2005). In the United Kingdom, devices like the Rodenator are only legal when used to collapse burrows

(not to kill animals), and operators must be sure the burrows are clear of animals before using the device

69 (Meyer Industries, 2010).

70

71 Action of the Substance:

72

73 When used to control rodents in crop production, propane is mixed with compressed oxygen to yield a

highly combustible, 2% propane and 98% oxygen mixture. The mixture is then ignited in the underground

rodent tunnel and the expansion of gases kills the animals in the burrow via concussion and/or

asphyxiation when all the oxygen is consumed (Sullins and Sullivan, 1992). This method also collapses the

tunnels. All of the propane is consumed in the reaction (CCOF, 2010).

78

- 79 Commercial devices developed for this method use a long wand attached to two gas hoses leading to
- 80 oxygen and propane tanks. A valve allows gases to mix and flow through the wand. The gas mixture is
- 81 ignited by an electrical switch at one end of the wand, which triggers a spark at the other end where the
- 82 gasses exit. One application method involves one operator driving a vehicle holding the tanks of gases,
- while another operates the wand (Sullins and Sullivan, 1992).
- A propane cannon uses propane to fuel loud blasts at regular intervals using an automatic timer. This
 device is intended to scare, but not to kill pest animals (PERC, no date).
- 87

When used as a thermal weed controller, propane gas burners are directed over weeds. The heat sears the
weeds causing the cell sap to expand and disrupt cell walls. The weeds wilt and die usually within a few
days (Diver, 2002).

91

92 <u>Combinations of the Substance</u>:93

Methyl mercaptan is added to propane by manufacturers to create an odor (for detection of leaks and other safety concerns). It may also be used in combination with iso-butane and butane to provide pressure to expel products as a spray or aerosol (LPG) (USDA, 2009a).

Status

100 Historic Use:

101

99

97 98

Propane has been used in agriculture for many years, primarily for what is known as "flame" weeding,
which uses heat/steam to kill weeds. Flame weeding was a popular thermal weed control technique used
from the 1930s until the mid-1960s when selective herbicides were readily available. In the 1980s and

105 1990s, flame weeding regained popularity, especially among organic farmers (Diver, 2002).

106

Similar to flame weeders, infrared weeders, which were first created in Europe, contain ceramic or steel
plates heated by a propane burner. They destroy unwanted plants in the same way as flame weeders
except without the open flame. This method is also more expensive than flame weeding (Diver, 2002).

111 OFPA, USDA Final Rule:

112

110

113 Propane is not listed as an allowed substance for organic crop production under 7 CFR § 205.601.

However, heat methods (fueled with propane) are allowed to control weeds (§ 205.206(c)(5)). Propane is

also not listed under § 205.605(b) as an allowed substance in or on processed products labeled as "organic"

116 or "made with organic." Propane is prohibited for use in organic handling due to its potential adverse

effect on human health and the environment and because it is a synthetic byproduct of the petrochemical

118 industry (USDA, 2009b; see Evaluation Question 3 for further information on the production of propane).

119

120 International:

121

Propane is not specifically listed on the Canadian Organic Production Systems Permitted Substances List
 (Canadian General Standards Board, 2011a). The general standards state the following:

123 124 125

126

127

128

"Pest, disease and weed control shall be centred on organic management practices aimed at enhancing crop health and reducing losses caused by weeds, disease and pests. Organic management practices include cultural practices (e.g. rotations, establishment of a balanced ecosystem, and use of resistant varieties) and mechanical techniques (e.g. sanitation measures, cultivation, traps, mulches and grazing) (Canadian General Standards Board, 2011b)."

129 130

131 This suggests that pest control methods such as traps would be preferred; however, it is possible that the

132 propane-powered pest devices would be compatible as approved "mechanical" techniques.

133	
134	Canada's Food and Drug Regulations (last modified in April 2011) permit the use of propane as a food
135	additive (where purpose of use is as a pressure dispensing and aerating agent) in unstandardized foods
136	(Canadian Food Inspection Agency, 2011).
137	
138	Propane is listed by the CODEX Alimentarius Commission as a food additive used as a propellant (i.e., a
139	food additive gas, which expels a food from a container) and is identified with the International Numbering
140	System (INS) #944 (Codex Alimentarius Commission, 1989). Propane is not mentioned in any other
140	CODEX standard.
	CODEX stanuaru.
142	The Equation Equation (FEC) $C_{\rm equation}$ is $C_{\rm equation} = C_{\rm eq$
143	The European Economic Community (EEC) Council Regulation, EC No. 834/2007 allows for the use of
144	thermal pest control methods, which would likely include methods such as propane flame weeding. No
145	specific references to propane are made in this legislation, thus it is unknown whether propane pest control
146	methods for burrowing animals are allowed in organic agriculture.
147	
148	IFOAM (2010) states that, "Physical methods for pest, disease and weed management are permitted,
149	including the application of heat." This would indicate that methods such as flame weeding are allowed;
150	however, it is unclear if this includes the use of propane to control burrowing animals.
151	
152	According to the Japanese Agricultural Standard for organic plants, physical methods (e.g., using light,
153	heat, and sound), biological methods (e.g., using plants that naturally repel pests), and a short list of
154	naturally-derived chemical substances are the only techniques allowed to control pest species in organic
155	agriculture. Propane is not an allowed substance on this list. Although it is used as part of a physical
156	method to destroy burrows via explosion, the primary intention of the device is to suffocate the animal.
157	Therefore, it is unlikely that it would be allowed for burrowing pest management in organic agriculture in
158	Japan (JMAFF, 2005). However, flame weeding would be permitted as a thermal plant control method.
159	,, (
1.0	
160	Evaluation Questions for Substances to be used in Organic Crop or Livestock Production
160 161	Evaluation Questions for Substances to be used in Organic Crop or Livestock Production
	Evaluation Questions for Substances to be used in Organic Crop or Livestock Production <u>Evaluation Question #1: What category in OFPA does this substance fall under: (A)</u> Does the substance
161	
161 162	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance
161 162 163	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins
161 162 163 164	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and
161 162 163 164 165	<u>Evaluation Question #1: What category in OFPA does this substance fall under:</u> (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and
161 162 163 164 165 166	<u>Evaluation Question #1: What category in OFPA does this substance fall under:</u> (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic
161 162 163 164 165 166 167	<u>Evaluation Question #1: What category in OFPA does this substance fall under:</u> (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts)
161 162 163 164 165 166 167 168	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4,
161 162 163 164 165 166 167 168 169 170	<u>Evaluation Question #1: What category in OFPA does this substance fall under:</u> (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180?
161 162 163 164 165 166 167 168 169	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180?
161 162 163 164 165 166 167 168 169 170 171 172	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for
161 162 163 164 165 166 167 168 169 170 171 172 173	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not
161 162 163 164 165 166 167 168 169 170 171 172 173 174	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and
161 162 163 164 165 166 167 168 169 170 171 172 173 174 175	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not
161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176	Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts.
$ \begin{array}{r} 161 \\ 162 \\ 163 \\ 164 \\ 165 \\ 166 \\ 167 \\ 168 \\ 169 \\ 170 \\ 171 \\ 172 \\ 173 \\ 174 \\ 175 \\ 176 \\ 177 \\ 177 $	 <u>Evaluation Question #1: What category in OFPA does this substance fall under:</u> (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts.
161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or
$ \begin{array}{r} 161 \\ 162 \\ 163 \\ 164 \\ 165 \\ 166 \\ 167 \\ 168 \\ 169 \\ 170 \\ 171 \\ 172 \\ 173 \\ 174 \\ 175 \\ 176 \\ 177 \\ 178 \\ 179 \\ 179 \\ 179 \\ 179 \\ 179 \\ 163 \\ 164 \\ 165 \\ 167 \\ 166 \\ 167 \\ 177 \\ 178 \\ 179 \\ 179 \\ 179 \\ 163 \\ 164 \\ 165 \\ 166 \\ 167 \\ 166 \\ 167 \\ 176 \\ 177 \\ 178 \\ 179 \\ 179 \\ 179 \\ 179 \\ 179 \\ 170 \\ $	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or formulate the petitioned substance when this substance is extracted from naturally occurring plant,
$ \begin{array}{r} 161 \\ 162 \\ 163 \\ 164 \\ 165 \\ 166 \\ 167 \\ 168 \\ 169 \\ 170 \\ 171 \\ 172 \\ 173 \\ 174 \\ 175 \\ 176 \\ 177 \\ 178 \\ 179 \\ 180 \\ \end{array} $	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or
161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or formulation of the petitioned substance when this substance is extracted from naturally occurring plant, animal, or mineral sources (7 U.S.C. § 6502 (21)).
161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or formulate or formulate on this substance when this substance is extracted from naturally occurring plant, animal, or mineral sources (7 U.S.C. § 6502 (21)). Propane is a byproduct of natural gas processing and petroleum refining. Most of the U.S. supply of liquid
161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or formulation of the petitioned substance when this substance is extracted from naturally occurring plant, animal, or mineral sources (7 U.S.C. § 6502 (21)). Propane is a byproduct of natural gas processing and petroleum refining. Most of the U.S. supply of liquid propane is produced in the United States. Methane and other hydrocarbons, including propane, are
161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or formulation of the petitioned substance when this substance is extracted from naturally occurring plant, animal, or mineral sources (7 U.S.C. § 6502 (21)). Propane is a byproduct of natural gas processing and petroleum refining. Most of the U.S. supply of liquid propane is produced in the United States. Methane and other hydrocarbons, including propane, are obtained by separation from natural gas using a combination of increased pressure and decreased
161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or formulation of the petitioned substance when this substance is extracted from naturally occurring plant, animal, or mineral sources (7 U.S.C. § 6502 (21)). Propane is a byproduct of natural gas processing and petroleum refining. Most of the U.S. supply of liquid propane is produced in the United States. Methane and other hydrocarbons, including propane, are
161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or formulation of the petitioned substance when this substance is extracted from naturally occurring plant, animal, or mineral sources (7 U.S.C. § 6502 (21)). Propane is a byproduct of natural gas processing and petroleum refining. Most of the U.S. supply of liquid propane is produced in the United States. Methane and other hydrocarbons, including propane, are obtained by separation from natural gas using a combination of increased pressure and decreased
$ \begin{array}{r} 161 \\ 162 \\ 163 \\ 164 \\ 165 \\ 166 \\ 167 \\ 168 \\ 169 \\ 170 \\ 171 \\ 172 \\ 173 \\ 174 \\ 175 \\ 176 \\ 177 \\ 178 \\ 179 \\ 180 \\ 181 \\ 182 \\ 183 \\ 184 \\ 185 \\ \end{array} $	 Evaluation Question #1: What category in OFPA does this substance fall under: (A) Does the substance contain an active ingredient in any of the following categories: copper and sulfur compounds, toxins derived from bacteria; pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals; livestock parasiticides and medicines and production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleansers? (B) Is the substance a synthetic inert ingredient that is not classified by the EPA as inerts of toxicological concern (i.e., EPA List 4 inerts) (7 U.S.C. § 6517(c)(1)(B)(ii))? Is the synthetic substance an inert ingredient which is not on EPA List 4, but is exempt from a requirement of a tolerance, per 40 CFR part 180? The substance does not fall under any of the categories listed in 1(A); however devices which use propane could be considered a production aid. Propane is listed as an inert nonfood chemical and is allowed for use in nonfood pesticide products for conventional production (U.S. EPA, 2011b). However, propane is not included in the August 2004 listing of minimal risk inert ingredients (historically referred to as "4A" and "4B") (U.S. EPA, 2010). Propane is listed as a "List 3" substance on the August 2004 EPA List of Inerts. Evaluation Question #2: Describe the most prevalent processes used to manufacture or formulate the petitioned substance. Further, describe any chemical change that may occur during manufacture or formulation of the petitioned substance when this substance is extracted from naturally occurring plant, animal, or mineral sources (7 U.S.C. § 6502 (21)). Propane is a byproduct of natural gas processing and petroleum refining. Most of the U.S. supply of liquid propane is produced in the United States. Methane and other hydrocarbons, including propane, are obtained by separation from natural gas using a combination of increased pressure and decreased temperat

Propane

188 Evaluation Question #3: Is the substance synthetic? Discuss whether the petitioned substance is formulated or manufactured by a chemical process, or created by naturally occurring biological 189 190 processes (7 U.S.C. § 6502 (21)).

191

192 Propane is obtained by physical means of separation from natural gas (pressure and temperature); when it

193 is obtained in this way, it is not chemically changed and is considered nonsynthetic (MEA, 2006).

194 However, propane is also a synthetic byproduct of the petroleum refining industry; propane isolated from 195 these processes would be considered synthetic (MEA, 2006).

196

197 Evaluation Question #4: Describe the persistence or concentration of the petitioned substance and/or its 198 by-products in the environment (7 U.S.C. § 6518 (m) (2)).

199

200 According to the HSDB (2007), propane has moderate mobility in soil, but it is readily broken down by soil 201 microorganisms within 24 hours. Most propane exists as a gas in the environment and will move from soil 202 or water to the air due to its high vapor pressure. In the air, propane gas is broken down by hydroxyl 203 radicals and has a half life of 14 days. Bioconcentration of propane in aquatic organisms is low (HSDB, 204 2007). The material safety data sheet (MSDS) from Amerigas (2002) indicates that "no adverse ecological effects are expected" from propane. Another MSDS (Inergy Services, 2006) states that, "releases are 205 expected to cause only localized non-persistent environmental damage," which is supported by the rapid 206

207 degradation of propane in soil and the relatively rapid breakdown of propane gas in the air.

208

209 There are a number of known and potential contaminants in commercial liquefied propane gas products.

210 These include the plasticizers methyl linoleate, dioctyl adipate, and butyl benzyl phthalate. Some of these

contaminants can be removed from the final product using methods such as activated carbon filtration 211

212 (Sambrano and Meyer, 2006; PERC, 2006). These plasticizers are not particularly persistent in the

213 environment. Butyl benzyl phthalate, for example, adsorbs to soil and does not usually leach into groundwater. It is biodegraded in soil by 74-79% in about 10-50 days and in water in about 6 days in 214

(HSDB, 2010). According to the EPA, "dioctyl adipate presents a small hazard to the freshwater aquatic 215

216 environment" (U.S. EPA, undated). The MSDS for methyl linoleate indicates that this product is air and

217 light sensitive and will produce carbon oxides in the event of a fire. The chemical, physical, and

218 toxicological properties have not been thoroughly investigated, so it is unclear if this chemical is an

- 219 ecological toxicant (Sigma Aldrich, 2011).
- 220

221 Evaluation Question #5: Describe the toxicity and mode of action of the substance and of its 222 breakdown products and any contaminants. Describe the persistence and areas of concentration in the 223 environment of the substance and its breakdown products (7 U.S.C. § 6518 (m) (2)).

224

225 Propane is nonirritating to the eyes, nose, and throat. Dermal contact with liquefied propane can cause 226 burns and frostbite. A study that examined short-term human inhalation exposure to low-moderate levels 227 of propane gas (i.e., 250 to 1,000 ppm) did not show symptoms in exposed individuals. However, humans 228 exposed to higher levels of propane (e.g., 100,000 ppm) experienced symptoms of central nervous system 229 depression including vertigo and disorientation. There is a risk of asphyxiation from exposure to propane 230 gas in confined spaces that are not well ventilated. Asphyxiation is one of the intended actions of propane

- 231 when used to control burrowing rodents (HSDB, 2007).
- 232

233 The complete combustion of propane results in the formation of carbon dioxide (CO₂) and water vapor,

234 while incomplete combustion can produce carbon monoxide (CO). CO₂ and CO exposures can be harmful,

235 especially in areas that are not well ventilated. High levels of CO₂ in the environment displace oxygen,

236 which can cause hypoxia (oxygen deprivation) or anoxia (complete loss of oxygen) in an exposed person,

237 which can cause coma or death. Moderate levels may cause headaches, dizziness, restlessness, a tingling or

238 pins and needles feeling, difficulty breathing, sweating, tiredness, increased heart rate, and elevated blood

239 pressure (WI DHFS, 2005). CO interferes with the ability of the red blood cells to carry oxygen in the

240 blood. Exposure to moderate levels of CO can cause headache, fatigue, dizziness, and nausea. Exposure to

241 high concentrations of CO can cause coma or death within minutes (CCOSH, 2006). Propane-oxygen

- 242 devices must emit enough gas to displace oxygen and kill rodents; however, there are no indications that 243
- humans operating the device would be at risk of asphyxiation or other effects from high CO/CO₂ exposure

244	because the reactions take place underground and the gases likely dissipate into outdoor air (Sullins and
245	Sullivan, 1992).
246	
247	Evaluation Question #6: Describe any environmental contamination that could result from the
248	petitioned substance's manufacture, use, misuse, or disposal (7 U.S.C. § 6518 (m) (3)).
249	
250	Propane is released into the environment from manufacturing and disposal of petroleum and natural gas
251	products. However, as discussed in response to Evaluation Question #4, propane is not persistent in soil as
252	it is readily broken down by soil microorganisms within 24 hours. Propane gas also has a relatively rapid
253	breakdown in the air with a half life of 14 days. In aquatic organisms, propane is expected to have a low
254	bioconcentration potential (HSDB, 2007).
255	
256	Misuse, incorrect storage, or accidents (e.g., during transportation) involving propane may result in fire or
257	explosions due to its flammability and its reactivity with oxygen.
258	
259	Evaluation Question #7: Describe any known chemical interactions between the petitioned substance
260	and other substances used in organic crop or livestock production or handling. Describe any
261	environmental or human health effects from these chemical interactions (7 U.S.C. § 6518 (m) (1)).
262	
263	Propane is highly reactive with oxygen at high pressure (causing a combustion reaction). It can also react
264	vigorously with oxidizing materials such as bromine, chlorine, or fluorine. An explosive reaction occurs
265	when propane is combined with chlorine dioxide (HSDB, 2007). No interactions between propane and
266	other common substances used in agriculture were identified.
267	
268	Evaluation Question #8: Describe any effects of the petitioned substance on biological or chemical
269	interactions in the agro-ecosystem, including physiological effects on soil organisms (including the salt index and solubility of the soil) groups, and livestock (7 U.S.C. S (518 (m) (5))
270 271	index and solubility of the soil) crops, and livestock (7 U.S.C. § 6518 (m) (5)).
271	The petitioned method of collapsing burrows using propane may injure or kill nontarget species occupying
272	or living nearby the treated burrows. It may also cause fires if the nearby vegetation is dry (Sullins and
273	Sullivan, 1992).
275	Sumvan, 1992).
275	The force produced by the propane/oxygen reaction may disturb the soil and soil organisms due to the
270	concussive forces and/or loud noises generated. However, the likelihood and extent of these disturbances
278	is unclear. If a fire is produced from the propane explosion, soil structure may be altered and soil organic
279	matter may be lost or consumed. Reduced soil porosity and increased soil pH due to alterations in soil
280	chemistry may also be expected. These effects can indirectly affect water retention of the soil and increase
281	erosion. Depending upon the severity, duration, and other characteristics of the fire, soil damage can be
282	slight to more severe; in most cases, the effects of fire are minor and short-lived (BCMAFF, 2004). Because
283	propane is readily degraded by soil bacteria, soil disturbance related to propane itself would not be
284	expected.
285	
286	Evaluation Question #9: Discuss and summarize findings on whether the petitioned substance may be
287	harmful to the environment (7 U.S.C. § 6517 (c) (1) (A) (i) and 7 U.S.C. § 6517 (c) (2) (A) (i)).
288	
289	As discussed in Evaluation Question #4, propane has moderate mobility in soil and is readily degraded by
290	soil microorganisms within 24 hours. Most propane exists as a gas in the air, where it is broken down by
291	hydroxyl radicals and has a half life of about 14 days (HSDB, 2007). Propane is considered relatively
292	nontoxic when released into the environment. However, the method that uses propane to explode rodent
293	burrows may kill nontarget species within or in close proximity to the burrows. As discussed in
294	Evaluation Question #8, the concussive forces and potential fires caused by propane explosions may
295	damage surrounding plant life and disturb soil structure and soil communities.
296	
297	Evaluation Question #10: Describe and summarize any reported effects upon human health from use of
298	the petitioned substance (7 U.S.C. § 6517 (c) (1) (A) (i), 7 U.S.C. § 6517 (c) (2) (A) (i)) and 7 U.S.C. § 6518
299	(m) (4)).

300

Humans exposed to propane at inhaled concentrations of 250–1,000 ppm (up to 8 hours/day for 2 weeks) exhibited no notable physiological effects. However, at concentrations of 100,000 ppm, subjects suffered central nervous system depression expressed by distinct vertigo in under 15 minutes. If liquid propane comes in contact with the skin, it can cause burns and frostbite. Case studies of high propane exposure (both accidental and deliberate) reported other central nervous system effects such as disorientation and death from cardiac effects (HSDB, 2007).

- The use of propane/oxygen explosion devices also poses a physical safety risk to the operator. Improper
 use and/or inadequate safety gear could result in injury from explosion, flying debris, or fire (Meyer
 Industries, 2010).
- 311

307

Evaluation Question #11: Describe all natural (non-synthetic) substances or products which may be used in place of a petitioned substance (7 U.S.C. § 6517 (c) (1) (A) (ii)). Provide a list of allowed substances that may be used in place of the petitioned substance (7 U.S.C. § 6518 (m) (6)).

One potential alternative would be injection of carbon dioxide gas (CO₂) into burrows. Because CO₂ is

- 317 heavier than air, it sinks to the bottom of the burrow, displacing oxygen, and suffocating the animals
- inside. It is unclear, however, if CO₂ would remain at a high enough concentration long enough once
- injected into the ground to cause death to the target animals (Sullins and Sullivan, 1992). Unlike the
- 320 propane/oxygen method, this approach does not require explosions, which may be associated with fire
- and operator safety issues. Commercial systems are available that use an internal combustion engine used
- to generate CO, but no commercial CO_2 systems have been identified. Traditionally, most CO_2 was
- sequestered from natural reservoirs in rock formations. It can also be captured from natural gas
 combustion and new technologies are being developed to capture it from fertilizer, ethanol, and hydrogen
- plants (DOE, undated). It is unclear if CO_2 from natural reservoirs is available as a commercial source or whether it could be differentiated from a synthetic source.
- 327

A synthetic substance that can be used in rodent control is Vitamin D_3 , which is listed on the National List for use in crop production as a rodenticide (§ 205.601(g)). Vitamin D_3 , also known as cholecalciferol, is the active ingredient in commercially available rodenticide baits. Another substance allowed as a rodenticide under § 205.601(g) is sulfur dioxide. This substance may be used in smoke bombs for underground rodent control only. However, this substance is expected to be removed from the National List after its sunset date of October 21, 2012.

333334

No other chemical alternatives to the petitioned substance were identified. Physical control methods are described in Evaluation Question #12.

337

Evaluation Question #12: Describe any alternative practices that would make the use of the petitioned substance unnecessary (7 U.S.C. § 6518 (m) (6)).

340 There are a number of alternative practices to control burrowing rodent populations. For example, ground

- 341 squirrels and other rodents can be controlled to some degree via trapping (e.g., with humane traps).
- 342 Trapping is labor intensive but highly effective, especially for a small population of animals (Government
- of Alberta, 2006). One study (Meerburg et al., 2006) found that live traps, consisting of a wooden bait box
- filled with nonpoisonous peeled oat, were equally as effective as rodenticides in controlling rodents on 10
- farms. The use of natural attrition (i.e., predators such as coyotes and foxes) can also help control
- 346 burrowing animal populations. Supporting predator habitat, such as building nesting platforms for hawks
- and other aerial nesters, will encourage the natural predator populations. It is unlikely that natural
- attrition could control a pest population alone as the overall effect on ground squirrel damage via this
- method has been described as "not significant." However, it may be effective in combination with other
- pest management strategies (Government of Alberta, 2006). Because the aforementioned methods are
- 351 physical, mechanical, and biological, they are allowed by the National Organic Program (NOP) to control
- 352 pests.

- Shooting rodents can also help control populations; however, this is generally considered ineffective for burrowing animals because they seldom come above ground (Andelt and Case, 2006). Flooding burrows
- can also be helpful for either drowning the animals or forcing them out of their burrows into traps or
- 356 snares. However, an operator must be careful to avoid flooding near underground structures or building
- 357 foundations to avoid damage (Cleary and Craven, 2005)

358 Physical, mechanical, and biological methods are often more successful when combined with an

- 359 ecologically-based rodent management (EBRM) system. EBRM relies on knowledge of the population
- biology, social behavior, taxonomy, and community ecology of rodents in establishing appropriate pest
- management methods. EBRM principles have proven successful in a number of studies in several
 countries including Vietnam (Singleton et al., 2004; Brown et al., 2000). Tested EBRM systems include most
- 362 countries including Vietnam (Singleton et al., 2004; Brown et al., 2000). Tested EBRM systems include most
 363 or all of the following: trap-barrier systems, physical destruction of burrows, synchronized planting and
- harvesting of crops, clean up of weeds and other refuse, and embankment size reduction to discourage
- 365 burrowing. When these strategies were employed together, EBRM was just as effective as traditional
- rodent management (e.g., rodenticides), and these strategies often cost less than traditional methods
- 367 (Singleton et al., 2004; Brown et al., 2000).
- 368

369 <u>References</u>:

- 370
- Amerigas. 2002. Material Safety Data Sheet for Odorized Propane. Retrieved July, 2011 from
- 372 <u>http://www.amerigas.com/pdfs/safe_eng.pdf</u>
- 373
- Andelt, W.F.; Case, R.M. Managing pocket gophers. Colorado State University. Retrieved August 17, 2011
 from <u>http://www.ext.colostate.edu/pubs/natres/06515.pdf</u>
- BCMAFF (British Columbia Ministry of Agriculture, Food, and Fisheries). 2004. Fire Effects on Rangeland
- Factsheet: Fire Effects on Soil. British Columbia Ministry of Agriculture Food, and Fisheries, Canada. 3 pp.
- 379 Retrieved June 21, 2011 from http://www.agf.gov.bc.ca/range/publications/documents/fire2.pdf
- 380
- Brown, P.R., Tuan, N.P., Singleton, G.R., Hoa, P.T., Tan, T.Q., Hue, D.T., Van Tuat, N., Jacob, J., and Müller,
 W.J. 2000. Ecologically based management of rodents in the real world: Applied to a mixed agroecosystem
 in Vietnam. Ecol Appl 16 (5):2000-2010. [abstract]
- 384
- Canadian Food Inspection Agency. 2011. Food and Drug Regulations (C.R.C., c. 870). Amended April 2011.
 Retrieved July, 2011 from http://laws-lois.justice.gc.ca/eng/regulations/C.R.C.%2C_c._870/index.html
- 387
- 388 Canadian General Standards Board. 2011a. Organic Production Systems Permitted Substances List.
- 389 CAN/CGSB-32.311-2006. Amended June 2011. Retrieved July, 2011 from http://www.tpsgc-
- 390 pwgsc.gc.ca/ongc-cgsb/internet/bio-org/documents/032-0311-2008-eng.pdf
- 391392 Canadian General Standards Board. 2011b. Organic Production Systems General Principles and
- Management Standards. July, 2011. Retrieved July 29, 2011 from <u>http://www.tpsgc-pwgsc.gc.ca/ongc-</u> cgsb/internet/bio-org/documents/032-0310-2008-eng.pdf
- 395
- City of Boulder, Colorado. 2005. Wildlife protection ordinance: Prairie dogs and wild birds. Retrieved
 August 15, 2011 from
- 398 <u>http://www.bouldercolorado.gov/index.php?option=com_content&task=view&id=1688&Itemid=1412</u> 399
- 400 CCOF (California Certified Organic Farmers). 2010. Propane Petition; August 11, 2010. 54 pp. Retrieved
 401 June 2, 2011 from http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5086710
- 402
- 403 CCOSH (Canadian Center for Occupational Health and Safety). 2006. Propane-powered Vehicles
- 404 (including forklift trucks). Retrieved July, 2011 from
- 405 <u>http://www.ccohs.ca/oshanswers/safety_haz/forklift/propane.html</u>
- 406

Propane

407 408 409	Cleary, E.C.; Craven, S.R. 2005. Thirteen-lined ground squirrels and their control. Internet Center for Wildlife Damage Management, Cornell University. Retrieved August 17, 2011 from http://icwdm.org/handbook/rodents/13linedgroundsquirrel.asp
410	
411	Codex Alimentarius Commission. 1989. Codex Class Names and the International Numbering System for
412	Food Additives. Report CAC/GL 36-1989. 56 p. Retrieved June 20, 2011 from
413	http://www.codexalimentarius.net/download/standards/7/CXG_036e.pdf
414	
415	Department of Energy. Undated. Enhanced oil recovery/CO ₂ injection. Retrieved August 17, 2011 from
416	http://fossil.energy.gov/programs/oilgas/eor/
417	inply / looping by frograms, ongus, coly
418	Diver, S. 2002. Flame Weeding for Vegetable Crops. Produced for Appropriate Technology Transfer for
419	Rural Areas (ATTRA), Butte, MT. 16 p. Retrieved June 20, 2011 from
420	http://www.calameo.com/books/000715430abb640c8d5ae
420	<u>http://www.calaneo.com/books/000/13430abb040cousae</u>
421	The European Economic Community (EEC). 2007. Council Regulation (EC) No 834/2007. Retrieved July,
422	2011 from http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:189:0001:0023:EN:PDF
423	
424	Government of Alberta. 2006. Managing Richardson's Ground Squirrels. Agriculture and Rural
	Development, Alberta, Canada. Retrieved July, 2011 from
426	1
427	http://www1.agric.gov.ab.ca/\$department/deptdocs.nsf/all/agdex3471
428	LICDR (Harrandous Cultator and Data Ranla) 2010. Rutal honoral abthalata Datained Luna 2, 2011 from
429	HSDB (Hazardous Substances Data Bank). 2010. Butyl benzyl phthalate. Retrieved June 2, 2011 from
430	http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB
431	UCDP (Harry dave Caletaness Data Paul) 2007 Duanana Dataina d Luna 2, 2011 from
432	HSDB (Hazardous Substances Data Bank). 2007. Propane. Retrieved June 2, 2011 from
433	http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB
434	EQAM (Internetional Enderstion of Operation Agriculture Managements) 2010 The EQAM Names Detrieved
435	IFOAM (International Federation of Organic Agriculture Movements). 2010. The IFOAM Norms. Retrieved
436	July, 2011 from http://www.ifoam.org/about_ifoam/standards/norms.html
437	Increase Convision 2006 Material Colater Data Cheat (MCDC), Dramana Datrianad Luna 21, 2011 from
438	Inergy Services. 2006. Material Safety Data Sheet (MSDS): Propane. Retrieved June 21, 2011 from
439	http://www.bantamfuel.com/pdf/MSDS_Propane.pdf
440	DATE (Lease Minister of Assistant East and Eicherice) 2005 James Assistant Classical (an Oscaria
441	JMAFF (Japan Ministry of Agriculture, Food, and Fisheries). 2005. Japan Agricultural Standard for Organic
442	Plants. Notification No. 1605 of the Ministry of Agriculture, Food, and Fisheries. 9 pp. Retrieved June 10,
443	2011 from http://www.bcschina.com/admin/UploadFile/200912149433898.pdf
444	
445	MEA (Maryland Energy Administration). 2006. Straight Answers on Advanced Technologies; factsheet.
446	2 pp. Retrieved June 20, 2011 from
447	http://www.energy.state.md.us/incentives/transportation/factsheets/Propane.pdf
448	
449	Meerburg, B.G., Reimert, H.G.M., and Kijlstra, A. 2006. Live-traps vs. Rodenticides on Organic Farms:
450	Which method works best? Retrieved June 22, 2011 from <u>http://orgprints.org/7107/1/meerburgetal.PDF</u>
451	
452	Meyer Industries. 2010. Rodenator R3 Operator's Manual. Retrieved July, 2011 from
453	http://www.rodenator.eu/Rodenator%20R3%20Manual%20-%20UK%20ver%2001-01-10.doc
454	
455	PERC (Propane Education and Research Council). Undated. Pest Management and Sanitation Uses of
456	Propane in Agriculture. 16 pp. Retrieved June 20, 2011 from
457	http://naae.ca.uky.edu:8080/clearspace_community/servlet/JiveServlet/previewBody/2473-102-3-
458	<u>2965/Lesson_13%20-</u>
459	$\label{eq:20} \end{tabular} \end{tabular} 20 Pest \end{tabular} 20 Management \end{tabular} \end{tabular} 20 Agriculture.pdf; \\ \end{tabular} sessionid = 832 E5 F477 F40 AB610 B6304 ED287 C6330 Figure 1.5 Fi$
460	

461 462 463	PERC (Propane Education and Research Council). 2006. LP Gas Contamination Remediation at Bulk Terminals Project; Final Report. Prepared by Adept Science & Technologies, LLC. 49 pp. Retrieved June 20, 2011 from
464 465	http://www.propanecouncil.org/uploadedFiles/REP_11649%20Contaminant%20Remediation%20Bulk%2 0LPgas%20Terminals.pdf.
466 467 468 469 470	Sambrano, N. and Meyer, J. 2006. Process to Retrieve Heavy-End Contaminants from Commercial LP Gas Streams. LP Gas Global Technology Conference, 2006, Propane Education and Research Council and World LP Gas Association. Retrieved July, 2011 from http://www.adeptscience.net/Presentations/061020%20gtc%20paper-decont.pdf .
471	<u>mp.//www.udepiscience.net/11esenations/001020/02054e/020paper/decom.pdi</u> .
472 473 474	Sigma Aldrich. 2011. Material safety data sheet: Methyl linoleate. Retrieved July, 2011 from http://www.sigmaaldrich.com/catalog/DisplayMSDSContent.do
475 476 477 478	Singleton, G.R., Brown, P.R., and Jacob, J. 2004. Ecologically-based rodent management: Its effectiveness in cropping systems in south-east Asia. NJAS 52(2):163-171. Retrieved June 22, 2011 from http://library.wur.nl/ojs/index.php/njas/article/viewFile/351/70
479 480 481	Sullins, M. and Sullivan, D. 1992. Observations of a Gas Exploding Device for Controlling Burrowing Rodents. Proc. 15 th Vertebrate Pest Conf., University of California, Davis. Retrieved June 21, 2011 from http://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1075&context=vpc15
482 483 484 485	UC IPM (University of California Integrated Pest Management). 2006. Weed Management in Organic Vineyards. Retrieved July, 2011 from <u>http://www.ipm.ucdavis.edu/PMG/r302700511.html</u>
485 486 487	USDA (United States Department of Agriculture). 2009a. Propane: handling/processing. Technical Report. Retrieved June 20, 2011 from
488	http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5088871
489 490 491	USDA (United States Department of Agriculture). 2009b. National Organic Standards Board (NOSB) Recommended Decision Form; Propane. Retrieved June 20, 2011 from
492 493 494	http://www.ams.usda.gov/AMSv1.0/ams.fetchTemplateData.do?template=TemplateJ&page=NOPPetitionedSubstancesDatabase
494 495 496 497 498	U.S. EPA (U.S. Environmental Protection Agency). 2010. Inert Ingredients Eligible for FIFRA 25(b) Pesticide Products. Office of Prevention, Pesticides, and Toxic Substances. U.S. EPA, Washington, DC. 10 pp. Accessed August 15, 2011 from <u>http://www.epa.gov/opprd001/inerts/section25b_inerts.pdf</u>
499 500	U.S. EPA (U.S. Environmental Protection Agency). 2011a. Pest control devices. Retrieved August 15, 2011 from http://www.epa.gov/pesticides/factsheets/devices.htm#3
501 502 503 504 505	U.S. EPA (U.S. Environmental Protection Agency). 2011b. Inert Ingredients Permitted for Use in Nonfood Use Pesticide Products; Products Last Updated April 2011. Office of Prevention, Pesticides, and Toxic Substances. U.S. EPA, Washington, DC. 77 pp. Retrieved June 22, 2011 from <u>http://www.epa.gov/opprd001/inerts/inert_nonfooduse.pdf</u>
506 507 508 509 510	U.S. EPA (U.S. Environmental Protection Agency). Undated. Technical Factsheet on: DI (2-ETHYLHEXYL) ADIPATE. National Primary Drinking Water Regulations. Retrieved July, 2011 from http://www.epa.gov/ogwdw000/pdfs/factsheets/soc/tech/di-adipa.pdf
511 512 513	WI DHFS (Wisconsin Department of Health and Family Services, Division of Public Health). 2005. Fact sheet: Carbon dioxide. Retrieved June 21, 2011 from http://www.dhs.wisconsin.gov/eh/chemfs/pdf/CarbonDioxide.pdf
514	