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# CITY OF SACRAMENTO

DEPARTMENT OF ENGINEERING  
915 I STREET  
CITY HALL ROOM 207

SACRAMENTO, CALIFORNIA 95814  
TELEPHONE (916) 449-5281

CITY MANAGER'S OFFICE  
**RECEIVED**  
FEB 24 1983

J.F. VAROZZA  
CITY ENGINEER  
M.H. JOHNSON  
ASSISTANT CITY ENGINEER

February 23, 1983

City Council  
Sacramento, California

Honorable Members in Session:

SUBJECT: Letter of Official Protest Against Registration of  
Bolero 10G by California Department of Food and Agriculture  
(CDFA) Bitter Water Taste

SUMMARY

Attached is my letter of protest summarizing our reasons for opposing full registration of Bolero 10G by CDFA.

The 45-day public posting notice/comment. period ends on March 11, 1983 even though testing of Bolero 10G will not have been completed by CDFA.

RECOMMENDATION

I recommend that the City Council approve the attached letter of protest, and authorize me to present this letter to CDFA as the City's Official Protest Against Registration of Bolero 10G.

Respectfully submitted,

*J. F. Varozza*  
J. F. Varozza  
City Engineer

**APPROVED**  
BY THE CITY COUNCIL

Recommendation Approved:

MAR - 1 1983

OFFICE OF THE  
CITY CLERK

*Walter J. Slipe*

Walter J. Slipe  
City Manager

rcb  
14-A-030-00-0

March 1, 1983  
All Districts



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February 23, 1983

Mr. George Reese, Chief  
Pesticide Registration and  
Agricultural Productivity  
State of California  
Department of Food and Agriculture  
1220 N Street, Room A-400  
Sacramento, California 95814

Dear Mr. Reese:

SUBJECT: Official Protest Against Registration of Bolero 10G (EPA Reg. No. 239-2449), Active Ingredient Thiobencarb Compounded by Chevron Chemical Corporation with Assigned Applicant Numbers 3937A and 3163A - Agricultural Herbicide for Use in Rice to Control Barnyard Grass - Sections 3 and 24(c)

The recent State of California, Department of Food and Agriculture's (DFA) proposed decision to register Bolero has prompted the City of Sacramento to write this letter as a statement of our opposition to such action. The reasons for such opposition and a listing of areas of our continued concern are summarized in the following paragraphs.

### 1. Cause of Taste Problem

The City feels strongly that Bolero is the cause of the taste problem that has occurred in its drinking water supply during May and June of 1981 and 1982. We have been able to re-create, in the laboratory, the exact same problem taste by treating Bolero-spiked water with the same processes used to produce our drinking water. These processes convert Bolero to a sulfoxide. By spiking water with the sulfoxide we can again re-create the bad taste. In addition, Bolero has only been used, to any degree, during the past two years and we have had the taste problem only during the past two years. For the above reasons, we believe Bolero to be the causative agent of our taste problem.

### 2. Toxicity

To date, neither the Department of Food and Agriculture nor the Department of Health Services (DOHS) has certified to us that they have no professional concerns over possible acute or chronic health effects caused by metabolites of Bolero in the City's drinking water supply. There are few topics that are as alarming to the public as the

possible deterioration of their drinking water supply. Until the City receives this reassurance from CDFA and DOHS, our fears and deep concern will continue.

3. Financial Liability

The taste problem has caused the City to spend well over \$50,000 in attempting to discover the cause of the taste problem and treat it. These costs continue to accrue. More hard dollars will have to be spent this spring to treat water for the off-taste.

4. Labeling of Bolero

The new labeling requirement for Bolero of six-day field holding time is a definite improvement over the initial four-day period. We, however, feel this is still inadequate to keep Bolero out of the river. A longer label holding period is necessary to keep the herbicide on target and out of the Sacramento River. Dilution by the river will not solve the problem. The product and its metabolites must be kept on the field for as long as possible.

5. Water Quality Degradation

The presence of not only Bolero but Ordram in the waters of the Sacramento River is a violation of the State of California's Water Quality Standards. It is a clear degradation of water quality for our use of the Sacramento River as a domestic supply.

6. Bolero Residues in Fish

The recent disclosure of the fact that Bolero concentrates in the tissue of fish and may pose a potential hazard to those who ingest these fish adds further cause for concern. At the present time the data is still being reviewed by the Department of Health Services. We are hopeful that this issue will be resolved in the near future.

In summary, the City of Sacramento is disappointed and dismayed that the recommendations of the Rice Pesticide Subcommittee, as outlined in their memorandum of November 18, 1982, were not acted upon. If they had been, we would not be in the present situation.

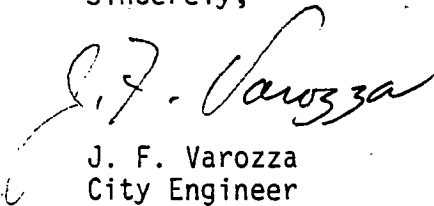
Moreover, the cause of our taste problem has not been definitely identified; neither CDFA nor DOHS has yet certified to us that the pesticide metabolites are free of toxic effects. The taste problem has cost the City over \$50,000 and these expenses are expected to continue. The labeling of Bolero is inadequate to keep the product on the rice fields; and the presence of Bolero in the Sacramento River is a violation of Water Quality Standards. We remain vitally concerned over these issues and will continue to oppose the registration of Bolero until they are resolved to our satisfaction.

February 23, 1983

Of particular concern to the City is the fact that CDFA has prematurely posted their 45-day public comment period ending March 11, 1983 while there are still tests to be completed on Bolero. Neither the public nor the City will have an opportunity to review and comment on these tests/findings prior to March 11, 1983. It is our opinion that CDFA is taking unknown risks in proceeding to register Bolero without having all tests completed, and not making available results of these tests to the public and City before considering registration of Bolero. We feel that CDFA should extend their March 11, 1983 posting date to a new date based on a 45-day period following CDFA receipt of all completed tests on Bolero.

We remain confident that action will be forthcoming to mitigate these issues.

Sincerely,



J. F. Varozza  
City Engineer

JGS:vz

cc: W. Crooks, CRWQCB-CVR  
A. Ellsworth, CDOHS  
Dr. R. Jackson, CDOHS  
J. Morehouse, CDOHS  
Dr. A. Kelter, CDOHS  
F. Finlayson, CDF&G  
D. Cohen, SAWRCB  
L. Connelly, State Assembly