

June 10, 2019

Last summer I called Pomerleau and expressed my concern about the signs that were posted on the grassy areas and mulched areas outside of Rite Aid, Shaws, Middlebury National Bank, and to the left of Cubbers. The signs say something like, "Pesticide has been sprayed. Do not step on for the next 2 hours."

I spoke with a secretary then, since the person in charge of maintenance was on vacation. No one returned my call. Eventually I called again. No one could talk to me then, besides the secretary. On October 29, 2018, Brian Waxler, the C.O.D. of Pomerleau called me back. I told him my concern about spraying poisons in our town of Bristol. He was not receptive to my concern. He said he was not feeling well. I told him to call me back when he was feeling better. He, so far, has not called me back.

On May 23rd, 2019, this year, I noticed a man putting in the warning signs in the mulch outside Rite Aid. I introduced myself and expressed my concern about his spraying. I asked him if he would be willing to tell me what he was about to spray. He said, "Razor Barricade". He had a TruGreen hat on. I thanked him for the information.

On May 29th, 2019, I called Pomerleau again. I spoke with a secretary and she connected me with Brian Waxler's voicemail. I asked if he would consider stopping the spraying of pesticides in our town of Bristol. He has not returned my phone call, yet.

On Friday, May 31st, 2019, I noticed some new warning signs in the grassy area to the left of Cubbers. At about 5:30, I also noticed a pregnant woman with a child in a stroller standing on the sidewalk next to the grassy area. This woman's puppy dog was lying on the grass. I saw on the back of the warning signs, the date and time of spraying: 5/31, 1600. Slim Pickens and I went over to the woman and suggested that she move her dog out of the area which had been sprayed less than 2 hours ago.

Tom Pollak and I did some research about Razor Barricade. We could not find the product. Tom sent me the Material Safety Data Sheet for Razor Pro. I printed up information about Barricade 4FL and Barricade 65WG, written up in an article, "Why Lawn Care Pesticides are Dangerous to Your Children, Pets, and the Environment", by Matthew Wilson and Jay Rasku, Toxics Action Center, March 2005. I leave this information with you.

I ask that someone from our Selectboard reach Pomerleau and request that they stop having pesticides sprayed in our town. The public has access to these areas. I am very concerned.

If Pomerleau refuses to comply with our reasonable request, please act responsibly and communicate with the public in a clearer fashion than is currently being used. Perhaps move the benches to the left of Cubbers. I think people also sit on that grass during town festivals and especially on July 4th.

Please get back to me to let me know what action has been taken.

Sincerely, Patty Heather-Lea

Patty Heather-Lea
pattyheatherlea@gmail.com

“Why Lawn Care Pesticides are Dangerous to Your Children, Pets, and the Environment” by Matthew Wilson and Jay Rasku, Toxics Action Center, March 2005

Barricade 4FL and Barricade 65WG

Active Ingredient: Prodiamine

General Information

Both Barricade 65WG (solid granules) and Barricade 4FL (liquid) are manufactured by Syngenta Crop Protection Inc. and bear the USEPA signal word ‘CAUTION.’ The active ingredient is prodiamine at 40.7% of the product weight in Barricade 4FL, and 65.0% in Barricade 65WG.

Barricade 4FL and Barricade 65WG (registered in 1992) are dinitroaniline herbicides and Barricade 4FL contains three inert ingredients that are required to be listed, all others are kept as trade secrets. Barricade 65WG contains three listed inerts plus many unlisted inerts. At high temperatures, these two pesticides decompose into toxic gases.

Known Inerts For Barricade 4FL

Propylene Glycol

Causes “central nervous system depression (anesthesia, dizziness, confusion), headache and nausea.” Studies also indicate that prolonged oral consumption resulted in kidney and liver damage, and this substance is also an eye irritant and skin irritant. Propylene glycol is also toxic to rainbow trout.

Attapulgitte Clay (Crystalline Silica, Quartz)

This material causes pulmonary fibrosis if repeated and prolonged inhalation of its dust occurs. Since Barricade 4FL is a liquid product, inhalation effects due to attapulgitte clay are unknown. There is no human data available for carcinogenicity, but some animal tests indicate that attapulgitte clay is carcinogenic. The IARC categorizes this substance as “not classifiable” or Group 3.

Known Inerts For Barricade

65WG

Dispersing Agent

This chemical (unidentified) causes eye, skin and respiratory tract irritation.

Kaolin Clay

Dust remains in lungs to the extent that it is detectible by x-ray if the person is exposed repeatedly over the long term, and may cause respiratory problems. ~~HS~~

Acute Toxicity for Barricade 4FL

Basic acute reactions to Barricade 4FL include allergic skin reactions, and mild eye and skin irritation. The acute toxicity test results for Barricade 4FL indicate that this pesticide is practically non-toxic, and based on guinea pig studies, Barricade 4FL is a skin sensitizer. The EPCRA SARA Title III Classification of this pesticide is "acute health hazard," and both the NFPA and HMIS rate it as "2, moderate."

Acute Toxicity for Barricade 65WG

Barricade 65WG is practically non-toxic upon ingestion, slightly toxic upon dermal exposure, and inhalation, and rabbit studies indicate that this pesticide is mildly irritating to the eye. ¹¹⁹ Barricade 65WG is also a skin sensitizer. The EPCRA SARA Title III Classification of this pesticide is "acute health hazard, chronic health hazard, and reactive hazard, and NFPA and HMIS rates it as "1, slight."

Health Effects

Rat fetuses exhibited prodiamine toxicity at high doses, and the maternal toxicity was 1g/kg/day. Rats also experienced liver enlargement and thyroid problems (hormone imbalances) at high doses, and decreased body weight gains when exposed to prodiamine. Rats also developed benign thyroid tumors. The US USEPA classifies Prodiamine as a group C possible carcinogen. Prodiamine is also a suspected endocrine disruptor but more studies are needed.

Environmental Effects

Prodiamine is highly toxic to fish and invertebrates such as rainbow trout and sheepshead minnows. Chronic ecological tests have not been

conducted. Bioaccumulation of prodiamine is high, and prodiamine "degrades rapidly in the sunlight" Prodiamine is persistent in soil.

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For Chemical Emergency, Spill, Leak, Fire, Exposure, or Accident, Call CHEMTREC Day or Night: 1-800-424-9300. For Medical Emergencies Only, Call 1-877-325-1840.

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Razor® Pro Synonyms: Isopropylamine Salt of Glyphosate; Glyphosate IPA Salt EPA Reg. No.: 228-366

Company Name: Nufarm Americas Inc.

150 Harvester Drive, Suite 200 Burr Ridge, IL 60527

Date of Issue: March 27, 2007 Supersedes: March 23, 2005 Sections

Revised: New or updated information all sections

2. HAZARDS IDENTIFICATION

Emergency Overview: Appearance and Odor: Clear, viscous greenish/yellow solution with little odor. Warning Statements: Keep out of reach of children. CAUTION. Causes moderate eye irritation. Harmful if swallowed or inhaled. Do not get in eyes or on clothing. Avoid breathing vapor or spray mist.

Potential Health Effects: Likely Routes of Exposure: Skin contact and inhalation. Eye Contact: The undiluted product may cause pain, redness and tearing based on toxicity studies. Skin Contact: Slightly toxic and slightly irritating based on toxicity studies. Ingestion: Slightly toxic based on toxicity studies. No significant adverse health effects are expected to develop if only small amounts (less than a mouthful) are swallowed. Inhalation: Low inhalation toxicity. Medical Conditions Aggravated by Exposure: None known.

See Section 11: TOXICOLOGICAL INFORMATION for more information.

Potential Environmental Effects: Available data on similar formulations suggest that this product would be slightly to moderately toxic to aquatic organisms and practically non-toxic to avian species, honeybees and earthworms.

See Section 12: ECOLOGICAL INFORMATION for more information.

3. COMPOSITION / INFORMATION ON INGREDIENTS

COMPONENT CAS NO. % BY WEIGHT Glyphosate, N-(phosphonomethyl) glycine, in the form of its

isopropylamine salt

38641-94-0 41.0

Other Ingredients Including: 59.0

Ethoxylated Tallowamines 61791-26-2

4. FIRST AID MEASURES

If in Eyes: Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. If Swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. If Inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice. If on Skin: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

5. FIRE FIGHTING MEASURES

Flash Point: Not applicable due to aqueous formulation Autoignition Temperature: Not determined Flammability Limits: Not determined Extinguishing Media: In case of fire, use water (flood with water), dry chemical, CO₂, or alcohol foam. Special Fire Fighting Procedures: Firefighters should wear NIOSH/MSHA approved self-contained breathing apparatus and full fire-fighting turn out gear. Dike area to prevent runoff and contamination of water sources. Dispose of fire control water later. Unusual Fire and Explosion Hazards: Containers will burst from internal pressure under extreme fire conditions. If water is used to fight fire or cool containers, dike to prevent runoff contamination of municipal sewers and waterways. Hazardous Decomposition Materials (Under Fire Conditions): May produce gases such as oxides of carbon, nitrogen, and phosphorous.

National Fire Protection Association (NFPA) Hazard Rating: Rating for this product: Health: 1 Flammability: 1 Reactivity: 0 Hazards Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe

6. ACCIDENTAL RELEASE MEASURES

Personal Precautions: Wear appropriate protective gear for the situation. See Personal Protection information in Section 8. Environmental

Precautions: Prevent material from entering public sewer systems or any waterways. Do not flush to drain. Large spills to soil or similar surfaces may necessitate removal of topsoil. The affected area should be removed and placed in an appropriate container for disposal. Methods for Containment: Dike spill using absorbent or impervious materials such as earth, sand or clay. Collect and contain contaminated absorbent and dike material for disposal. Methods for Cleanup and Disposal: Pump any free liquid into an appropriate closed container. Thoroughly scrub floor or other impervious surface with a strong industrial detergent and rinse with water. Collect washings for disposal. Decontaminate tools and equipment following cleanup. See Section 13: DISPOSAL CONSIDERATIONS for more information. Other Information: Large spills may be reportable to the National Response Center (800-424-8802) and to state and/or local agencies.

7. HANDLING AND STORAGE

Handling: Do not get in eyes or on clothing. Avoid breathing vapor or spray mist. Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove Personal Protective Equipment (PPE) immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined containers.

DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS.

This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious

personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

Storage: STORE ABOVE 10oF (-12oC) TO KEEP PRODUCT FROM CRYSTALLIZING. Crystals will settle to the bottom. If allowed to crystallize, place in a warm room 68oF (20oC) for several days to redissolve and shake, roll or agitate to mix well before using. Do not contaminate water, foodstuff, feed or seed by storage or disposal.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

Engineering Controls: Where engineering controls are indicated by specific use conditions or a potential for excessive exposure, use local exhaust ventilation at the point of generation.

Personal Protective Equipment: Eye/Face Protection: To avoid contact with eyes, wear chemical goggles or shielded safety glasses. An emergency eyewash or water supply should be readily accessible to the work area.

Skin Protection: To avoid contact with skin, wear long pants, long-sleeved shirt, socks and shoes. An emergency shower or water supply should be readily accessible to the work area. Respiratory Protection: Not normally required. If vapors or mists exceed acceptable levels, wear NIOSH

approved air-purifying respirator with cartridges/canisters approved for use against pesticides. General Hygiene Considerations: Personal hygiene is an important work practice exposure control measure and the following general measures should be taken when working with or handling this material: 1) do not store, use and/or consume foods, beverages, tobacco products, or cosmetics in areas where this material is stored; 2) wash hands and face carefully before eating, drinking, using tobacco, applying cosmetics or using the toilet.

Exposure Guidelines:

OSHA ACGIH Component TWA STEL TWA STEL Unit Isopropylamine Salt of Glyphosate NE NE NE NE Ethoxylated Tallowamines NE NE NE NE

NE = Not Established

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance and Odor: Clear, viscous greenish/yellow solution with little odor. Boiling Point: Not determined Solubility in Water: Soluble Density: 9.67 pounds/gallon Specific Gravity: 1.160 @ 20oC Evaporation Rate: Not determined Vapor Density: Not determined

Freezing Point: 10oF (-12oC) Vapor Pressure: Not determined pH: 4.5 – 5.5 Viscosity: 29.5 cps @ 20oC

Note: Physical data are typical values, but may vary from sample to sample. A typical value should not be construed as a guaranteed analysis or as a specification.

10. STABILITY AND REACTIVITY

Chemical Stability: This material is stable under normal handling and storage conditions. Conditions to Avoid: Excessive heat. Do not store near heat or flame. Incompatible Materials: Strong oxidizing agents: bases and acids. This product reacts with galvanized steel or unlined steel (except stainless steel) to produce hydrogen gas that may form a highly combustible gas mixture which could flash or explode. Hazardous Decomposition Products: Under fire conditions may produce gases such as oxides of carbon, nitrogen, and phosphorous. Hazardous Reactions: Hazardous polymerization will not occur.

11. TOXICOLOGICAL INFORMATION

Toxicological Data: Data from laboratory studies conducted on a similar, but not identical, formulation:

Oral: Rat LD50: >5,000 mg/kg Dermal: Rat LD50: >5,000 mg/kg Inhalation: Rat 4-hr LC50: >2.05 mg/l Eye Irritation: Rabbit: Moderately irritating Skin Irritation: Rabbit: Slightly irritating Skin Sensitization: Not a contact sensitizer in guinea pigs following repeated skin exposure.

Subchronic (Target Organ) Effects: Repeated overexposure to glyphosate may decrease body weight gains and effects to liver. The surfactant component of this product is reported to cause irritation to the eyes and skin and may contribute to the irritation potential reported for this herbicide. Ingestion may produce gastrointestinal irritation, nausea, vomiting and diarrhea. Carcinogenicity / Chronic Health Effects: Prolonged overexposure to glyphosate may cause effects to the liver. There was no evidence of carcinogenicity in animal studies using glyphosate. EPA has given glyphosate a Group E classification (evidence of non-carcinogenicity in

humans). Reproductive Toxicity: In laboratory animal studies with glyphosate, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals. Developmental Toxicity: In animal studies, glyphosate did not cause birth defects in animals; other effects were seen in the fetus only at doses which caused toxic effects to the mother. Genotoxicity: Glyphosate has produced no genetic changes in a variety of standard tests using animals and animal or bacterial cells. Assessment Carcinogenicity: None listed with ACGIH, IARC, NTP or OSHA.

See Section 2: HAZARDS IDENTIFICATION for more information.

12. ECOLOGICAL INFORMATION

Ecotoxicity: Data on Glyphosate technical:

96-hour LC50 Bluegill: 120 mg/l Bobwhite Quail 8-day Dietary LC50: >4,500 ppm 96-hour LC50 Rainbow Trout: 86 mg/l Mallard Duck 8-day Dietary LC50: >4,500 ppm 48-hour LC50 Daphnia: 780 mg/l

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Environmental Fate: In the environment, salts of glyphosate rapidly dissociate to glyphosate, which adsorbs strongly to soil and is expected to be immobile in soil. Glyphosate is readily degraded by soil microbes to AMPA (aminomethyl phosphonic acid) that is further degraded to carbon dioxide. Glyphosate and AMPA are unlikely to enter ground water due to their strong adsorptive characteristics. Terrestrially-applied glyphosate has the potential to move into surface waters through soil erosion because it may be adsorbed to soil particles suspended in the runoff. Aquatic applications registered for certain formulations may also result in glyphosate entering surface waters. Complete degradation is slow, but dissipation in water is rapid because glyphosate is bound in sediments and has low biological availability to aquatic organisms. These characteristics suggest a low potential for bioconcentration in aquatic organisms and this has been verified by laboratory investigations of glyphosate bioconcentration in numerous marine and freshwater organisms with and without soil. The maximum whole body bioconcentration factors for fish were observed to be less than 1X. Bioconcentration factors for sediment dwelling mollusks and crayfish tended to be slightly higher, but were always less than 10X. In addition, any residues accumulated in organisms were rapidly eliminated.

13. DISPOSAL CONSIDERATIONS

Waste Disposal Method: Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state or local procedures. Emptied container retains vapor and product residue. Observe all label safeguards until container is destroyed.

Container Handling and Disposal: Plastic Bottles and Non-Returnable

Plastic Drums: Do not reuse container. Triple rinse container. Then puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Returnable/Refillable Containers: Close all openings which have been opened during use and replace all caps. Contact Nufarm Customer Service at 1-800-345-3330, to arrange for return of the empty refillable container.

14. TRANSPORTATION INFORMATION

Follow the precautions indicated in Section 7: HANDLING AND STORAGE of this MSDS.

DOT Non Regulated – See 49 CFR 173.132(b)(3)

IMDG

Non Regulated – See IMDG 2.6.2.1.3

IATA Non Regulated – See IATA 3.6.1.5.3

15. REGULATORY INFORMATION

U.S. Federal Regulations:

TSCA Inventory: This product is exempted from TSCA because it is solely for FIFRA regulated use.

SARA Hazard Notification/Reporting: Hazard Categories Under Criteria of SARA Title III Rules (40 CFR Part 370): Immediate

Section 313 Toxic Chemical(s): None

Reportable Quantity (RQ) under U.S. CERCLA: None

RCRA Waste Code: None

State Information: Other state regulations may apply. Check individual state requirements.

California Proposition 65: Not listed

16. OTHER INFORMATION

This Material Safety Data Sheet (MSDS) serves different purposes than and DOES NOT REPLACE OR MODIFY THE EPA-ACCEPTED PRODUCT LABELING (attached to and accompanying the product

container). This MSDS provides important health, safety and environmental information for employers, employees, emergency responders and others handling large quantities of the product in activities generally other than product use, while the labeling provides that information specifically for product use in the ordinary course.

Use, storage and disposal of pesticide products are regulated by the EPA under the authority of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) through the product labeling, and all necessary and appropriate precautionary, use, storage, and disposal information is set forth on that labeling. It is a violation of Federal law to use a pesticide product in any manner not prescribed on the EPA-accepted label.

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