



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUN 12 1987

MEMORANDUM

PESTICID OFFICE OF  
AND TOXIC SUBSTANCES

SUBJECT: Sodium Monofluoroacetate (Compound 1080),  
[TOX Chem. No. 770]

FROM: Ray Landolt  
Review Section #1  
Toxicology Branch  
Hazard Evaluation Division (TS-769C) *RL 6/10/87*

THRU: R. Bruce Jaeger, Section Head  
Review Section #1  
Toxicology Branch  
Hazard Evaluation Division (TS-769C) *RBJ 6/11/87*

TO: William Miller, PM 16  
Insecticide/Rodenticide Branch  
Registration Division (TS-767) *WMS 6/12/87*

Registrant: USDA, Animal Damage Control, letter of May 1, 1987

Registration No.: 56228-22

Action Requested: Response to Notice of Data Requirements  
Pursuant to 3(c)(2)B of FIFRA, Livestock  
Protection Collar

Recommendation:

1. The primary eye and dermal irritation studies found deficient in the July 14, 1986 Laboratory Audit at the Denver Wildlife Research Center, were conducted with a 1.0% formulation.

If the data derived from study 3, Estimated Doses of Sodium Fluoroacetate Delivered to Coyotes by Toxic Collars, results in a change in the use concentration in the collar, then these two irritation studies should be conducted on the final concentration of 1080 to be used in the collar.

2. The primary eye and dermal irritation studies should be conducted with the use concentration of 1080 less the coloring agent included as a marker.

3. It is noted that these two irritation studies may be conducted under contract to a commercial laboratory, however, in the attachment - Study I and II identifies the Denver Wildlife Research Center as the laboratory to perform these studies. Consideration should be given to deficiency seven of the Lab Audit "The studies were not properly authenticated to indicate that the irritation responses were scored by an experienced/qualified examiner".

4. We have no objection to the change in the coloring agent used as a marker. However, the placement of rhodamine B dye on "List 1 of Pesticide Inerts" was for food uses of the dye. The use of rhodamine B dye in the Livestock Protection Collar as a marker would not be considered a food use.