

SHAUGHNESSEY NO.  
112701

REVIEW NO.  
25

EEB BRANCH REVIEW

DATE: IN 5-30-84 OUT 6-01-84

FILE OR REG. NO. 10182-LI

PETITION OR EXP. PERMIT NO.

DATE OF SUBMISSION 5-14-84

DATE RECEIVED BY HED 5-24-84

RD REQUESTED COMPLETION DATE 9-11-84

EEB ESTIMATED COMPLETION DATE 9-4-84

RD ACTION CODE/TYPE OF REVIEW 171/Old Chemical

TYPE PRODUCT(S): I, D, H, F, N, R, S Rodenticide

DATA ACCESSION NO(S).

PRODUCT MANAGER NO. W. Miller (16)

PRODUCT NAME(S) Valid Rodenticide

COMPANY NAME ICI Americas, Inc.

SUBMISSION PURPOSE Submission of label in response to meeting

SHAUGHNESSEY NO. CHEMICAL, & FORMULATION % A.I.

112701 Brodifacoum 10 ppm

EE Branch Review

Valid (10182-LI)  
Brodifacoum (Shaughnessy No. 112701)

100 Submission Purpose and Label Information

100.1 Submission Purpose and Pesticide Use

Purpose: Submission of proposed label in order for EPA/OPTS/HED/EEB to seek formal consultation (Section 7) with the Office of Endangered Species (OES)/USDI/USFWS. EEB is to review the label to determine if any additional labeling statements are warranted.

Use: Valid™ is a rodenticide containing 10 ppm of the active ingredient Brodifacoum. The current proposed label indicates that it is for use against Microtus spp. (Pine and Meadow Voles) only in apple orchards and only in the states of: Delaware, New Jersey, Maryland, New York, North Carolina, Ohio, Pennsylvania, Virginia and West Virginia.

100.2 Formulation Information

Brodifacoum:	3-[3-(4'-bromo[1,1'-biphenyl]-4-yl)-	
	1,2,3,4-tetrahydro-1-naphthalenyl]-	
	4-hydroxy-2H-1-benzopyran-2-one	.... 0.001%
Inerts	.....	99.999%
	Total	100.000%

100.3 Application Methods, Directions Rates

The following is from the proposed label submitted 14th May 1984:

"USE RESTRICTIONS: This product may be used only in the states of Delaware, New Jersey, Maryland, New York, North Carolina, Ohio, Pennsylvania, Virginia and West Virginia.

Apply VOLID for control of Microtus species such as pine voles and meadow voles in apple orchards. Apply bait after harvest while the orchard is in a nonbearing phase. Do not make applications until all apples are harvested and harvestable drops have been removed. Removal of culls from the orchard before treatment will help eliminate an alternate food supply. For best results, apply only when day time temperatures exceed 40° F.

Do not apply if rain is expected within 3 days or within 7 days after picking up dropped fruit since vole burrows will have been disturbed.

Where herbicides or cultivation are used, apply VOLID in adjacent ground cover (e.g., grassy middles) where voles are active.

HAND (SPOT) BAITING: Apply at 5-15 pounds per acre. For example, based on 40 trees per acre, apply 2 ounces of VOLID per tree for 5 pounds per acre. Up to 4 baiting spots per infested tree can be made. Cover all bait points with tire section, shingle, board, or other cover. Efficacy will be improved if such covers are placed in the orchard at least one month prior to bait application to ensure vole utilization. Application need only be made to trees showing signs of infestation. Do not exceed 15 pounds per acre per season. To help prevent invasion, application to noncrop border area such as ditch banks, hedgerows and fence lines may also be made.

Apply bait in active areas near trees or in active runways or burrows. In baiting, do not disturb existing vole burrows.

BROADCAST BAITING: Hand or machine broadcast bait evenly and penetrate vegetative cover. Do not broadcast over bare ground. Apply at 5-15 pounds per acre. If vole activity remains high at 2 weeks after treatment, make a second application. Do not exceed 15 pounds per acre per season. Be sure to pick up any pellet spills promptly, as from loading hopper, etc. Equipment allowing low broadcast rates, such as a tractor mounted Lely spreader with a side deflector and small seeder ring are effective in applying VOLID."

#### 100.4 Target Organisms

Pine Voles  
Meadow Voles

#### 100.5 Precautionary Labeling

(From the proposed label)

##### "ENVIRONMENTAL HAZARDS

This product is toxic to fish birds and wildlife. This product can pose a secondary hazard to birds of prey and mammals. Keep out of any body of water."

#### 101 Hazard Assessment

This submission is for a label review and anticipated OES/FWS Section 7 consultation. Previous hazard assessments in regards to this product and it's use pattern still are applicable.

##### 101.1 Likelihood of Adverse Effects to Non-target Organisms

See previous 24 reviews and meeting minutes.

##### 101.2 Endangered Species Considerations

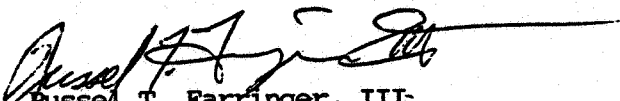
EEB will be seeking a formal consultation on this use pattern, as proposed. We anticipate that the required packet of information will be forwarded to OES/FWS by mid-June with a possible reply by September, 1984.

102 Classification

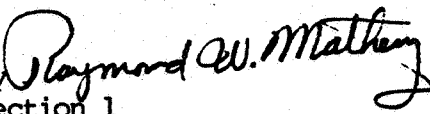
The company indicates that they are voluntarily classifying the product as "Restricted." EEB's data indicates that there is a regulatory rationale for this classification.

103 Conclusions

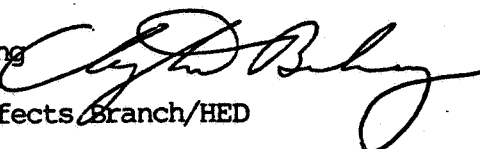
EEB has reviewed ICI's revised label for use of Brodifacoum to control meadow and pine mice in apple orchards in nine states. Because of potential adverse impacts upon endangered/threatened species, EEB, as required, will seek a formal Section 7 consultation with the Office of Endangered Species/FWS. Upon receipt of the biological opinion, EEB will, as necessary, amend the precautionary labeling for this apple orchard use pattern of Brodifacoum.

  
Russel T. Farringer, III  
Wildlife Biologist  
Ecological Effects Branch/HED

Date: 6/1/84

Raymond Matheny   
Head, Review Section 1  
Ecological Effects Branch

Date: 6/1/84

Clayton Bushong   
Branch Chief  
Ecological Effects Branch/HED

6/1/84  
Date: