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

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OFFICE OF TOXIC SUBSTANCES

SUBJECT: Summary Interpretation of Toxicology Reviews on Brodifacoum, rodent poison.

FROM: Reto Engler, Ph.D.
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The end uses of this anticoagulant rodenticide include uses around the house, thus the question arrises whether the toxicology studies usually triggered by such a use are necessary to assess the hazard of the end use product. The need for such studies, however, is not simply predicated by the site of use but rather by the combination of site and likelyhood of exposure. The end use product is formulated at a concentration of 0.005% active ingredient, the formulation, furthermore, consists of hard pellets, and the pellets are contained in trays and mouse boxes. These factors, in consort, lead to the conclusion that long term studies and teratogenic studies are not necessary to assess the hazard of the end- use product since the possibility of exposure under normal use conditions is nil. Like any other anticoagulant rodenticide used around the house, however, these end- use products should be candidates for child resistant packaging. A recommendation on the type of packaging can not be made at this time since the best available technology has not been fully determined. We would however entertain suggestion from the registrant on how he intends to solve the problem.

The need for a teratology study to assess the hazard of the technical product and the concentrate for formulator use cannot be discounted. The situation here is different, in that a possibility of exposure exists for persons using the concentrate for purposes of formulating the end use products.

CC: Jean Jenkins