



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

FEB 24 1983

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Memorandum


TO: William H. Miller
Product Manager No. 16
Registration Division (TS-767)

THRU: Raymond W. Matheny *RWM*
Head, Review Section No. 1
Ecological Effects Branch
Hazard Evaluation Division (TS-769)

Clayton Bushong, Chief *CB*
Ecological Effects Branch
Hazard Evaluation Division (TS-769)

SUBJECT: Talon Rodenticide Pellets EPA Experimental Use Permit No. 10182-
EUP-20, Request for Renewal

EEB feels that this EUP is contrary to the agreement reached with ICI Americas, Inc., in regards to field uses of 50 ppm Brodifacoum Products. ICI had agreed verbally to supply the results of the screech owl study in Virginia using the 10 ppm formulation before requesting any further use patterns. The company on their own volition changed the orchard use product from 50 ppm to 10 ppm. A.I. supposedly because the higher concentration had an adverse effect to non-target animals. They still have not produced the data requested in regards to the 10 ppm formulation that would indicate whether or not the lower dose rate likewise had adverse impact. Further, the proposal may answer the efficacy question, but is not planned adequately to determine primary and secondary hazards to non-target animals. Thus, even if RD approves this EUP, EEB will not receive enough data to complete a hazard assessment, which would leave us only one alternative, that being to extrapolate from the orchard 50 ppm use data, Mendenhall's secondary poisoning study and the literature.


Russel T. Farringer, Wildlife Biologist
Ecological Effects Branch
Hazard Evaluation Division (TS-769)

112701
SHAUGHNESSEY NO.

21
REVIEW NO.

EEB BRANCH REVIEW

DATE: IN 2/2/83 OUT 2/22/83

FILE OR REG. NO. 10182-EUP-20

PETITION OR EXP. _____

DATE OF SUBMISSION January 27, 1983

DATE RECEIVED BY HED January 31, 1983

RD REQUESTED COMPLETION DATE March 23, 1983

EEB ESTIMATED COMPLETION DATE March 16, 1983

RD ACTION CODE/TYPE OF REVIEW 746/EUP

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

DATA ACCESSION NO(S). _____

PRODUCT MANAGER NO. W. Miller (16)

PRODUCT NAME(S) Talon Rodenticide Pellets

COMPANY NAME ICI Americas, Inc.

SUBMISSION PURPOSE EUP Renewal Request

SHAUGHNESSEY NO.

CHEMICAL & FORMULATION

% A.I.

112701

Brodifacoum

50 ppm