

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: October 25, 1979

SUBJECT: EPA File No. 10182-EA/ER/EU/EN. Products Containing 0.005% Brodifacoum.
Caswell #114AAA

FROM: John Doherty *John Doherty* 10/25/79
Toxicology Branch/HED (TS-769)

TO: J. M. Rea, PM #16
Registration Division (TS-767)

Toxicology Branch concurs with the memo of R. Engler (dated October 18, 1979 to D. Peacock) concerning the data requirements for 0.005% brodifacoum products formulated as rodent poisons.

In essence long term feeding, reproduction and teratology studies are not required for this end use because the site of use (as indicated in the product directions) renders the likelihood of exposure by humans remote.

EPA:OTS:HED:TOX:RD JDOHERTY:sb 10/25/79 X73710

Wm. Butter