ENVIRONMENTAL FATE AND EFFECTS DIVISION ECOLOGICAL EFFECTS BRANCH

List B Phase 4 - Response on Existing Studies Reviewed

Re: MRIO

CASE NO.: 2755

128442

CHEMICAL AI NAME: Brodifacoum

CHEMICAL NO.: 112701

REVIEWER'S NAME: James J. Goodyear

TELEPHONE NUMBER: 703-557-7726

DATE: January 4, 1991

USE PATTERN(S): In and around buildings.

GUIDELINE NO.: 72-2 (a) & (b). Acute toxicity test for freshwater invertebrates.

TITLE: Toxicity of the liquid concentrate, pelleted bait and technical material to first instar *Daphnia magna*. Submitted by ICI Americas, Inc., Agricultural Products, Wilmington, Delaware 19897. Report No. RJ00446B. Study No. PP518/CH/01.

MRIDS AND DATES OF STUDIES REVIEWED: MRID 128442 (1978) in 92195-012 (1990).

MRIDS AND DATES OF FULLY ACCEPTABLE STUDIES: None.

COMMENTS: Invalid for TEPs. Supplemental for TG $LC_{50} = 0.98 \text{ mg/l}$ (CI 0.9 - 1.8).

This study had been classified "Core" in 1978. The FIFRA '88 review of the data for the technical end-use products has revealed only nominal concentrations were used. Other Brodifacoum tests have shown that the nominal concentration can be less than half of the measured concentration, so this method is invalid.

The Technical grade was also done with nominal levels but the FIFRA '88 Summary provided some of the measured levels. The test was done in four sections, then the data was pooled. This procedure is not acceptable statistically, especially since *none* of the nominal levels had the same measured concentration between tests; levels had up to 4.3 times the nominal level. There are fourteen measured levels spread among the four studies. A "Supplemental" LC_{50} was calculated using these data.

They cannot be repaired because the pooling of the data is an incorrect procedure. The data are required for both the Technical Grade of Brodifacoum and for the Typical End-use Product(s). Therefore, the tests must be rerun and a satisfactory study reported submitted to EPA.



U.S. Environmental Protection Agency

Office of Pesticide Programs Information

Mathemak

Results

1 Items Found

MRID

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Summary Information For Study 128442

MRID: 128442

Citation Reference: Getty, C.; Wilkinson, W.; Sealey, C. (1978) Brodifacoum: Toxicity of the

Liquid Concentrate Pelleted Bait and Technical Material to First Instar Daphnia magna: Report Series RJ0046B. (Unpub- lished study received Mar 29, 1974 under 10182-26; prepared by Imperial Chemical Industries Ltd., Eng., submitted by ICI Ameri- cas, Inc., Wilmington, DE; CDL:237909-A)

Author: Getty, C.

Wilkinson, W. Sealey, C.

Sealey, C

Complete primary report --

experimental research

Receipt Date: 29-Mar-1979, 30-Mar-1979

Laboratory Project #: NO PROJNR

Accession #: 237909 A, 238019 B

Products Tested:

Content Category:

Status: Acceptable (07-Jun-1991)

Unacceptable (07-Jun-1991)

DP #:

Ingredients

PC Code	CAS#	Ingredient Name
112701	56073-10-0	Brodifacoum
Total Rows	s: 1	

Laboratory

Laboratory #	Laboratory Name	
959684	ICI Americas, Inc.	
Total Rows: 1		

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