10-5-79

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

003740

DATE: October 4, 1979

SUBJECT: EPA File No. 10182-EI, Brodifacoum 0.25% Concentrate. Caswell #114AAA

FROM: John Doherty
Toxicology Branch/HED (TS-769)

TO: Dan Peacock
Product Manager Team #16/RD (TS-767)

Action Requested: Assign signal word and comment on precautionary labelling.

Conclusion: The acute toxicity data support a toxicity category II label (WARNING).

Remarks:

(1) The signal word should be changed from "DANGER" to "WARNING".

(2) Delete "Skull and crossbones" from label.

(3) The precautionary statement should read: "May be fatal if swallowed, inhaled or absorbed through skin. Do not breathe vapors or spray mist. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling."

(4) Toxicology Branch recommends that the following statement be added to the precautionary statements. "Repeated inhalation, dermal contact or oral ingestion may result in accumulative toxicity."

(5) The teratogenic potential of this chemical must be established. Many anticoagulants are teratogens. Females of child bearing age should not be permitted to work as formulators until the teratogenic potential is established.

EPA FORM 1320-6 (REV. 3-76)

Summary Table: Acute Toxicity of Brodifacoum (0.25% formulation)

Test	Results	TOX. Cat.
1. Acute Oral LD50 - rats	.14 ml/kg	II
2. Acute Dermal LD50 - rabbits	1 ml/kg	II
3. Acute Inhalation LC50 - rabbits	>1.012 mg/l	II
4. Dermal Irritation	Mild	III
5. Eye Irritation	Mild	III

BRODIFACOUM

Page_____ is not included in this copy.

Pages 3 through 5 are not included.

The material not included contains the following type of information:

____ Identity of product inert ingredients.

____ Identity of product impurities.

____ Description of the product manufacturing process.

____ Description of quality control procedures.

____ Identity of the source of product ingredients.

____ Sales or other commercial/financial information.

X A draft product label.

____ The product confidential statement of formula.

____ Information about a pending registration action.

____ FIFRA registration data.

____ The document is a duplicate of page(s) _____.

____ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.