	100-987 United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number NOTIFICATION
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**Application for Pesticide - Section I**

1. Company/Product Number 100-987	2. EPA Product Manager Daniel Peacock	3. Proposed Classification  <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Brodifacoum Technical	PM# IRB	
5. Name and Address of Applicant (Include ZIP Code) Syngenta Crop Protection, Inc. P. O. Box 18300 Greensboro, NC 27419  <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:  EPA Reg. No. _____ Product Name _____

**Section - II**

<input type="checkbox"/> Amendment - Explain below.  <input type="checkbox"/> Resubmission in response to Agency letter dated _____  <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application.  <input type="checkbox"/> Other - Explain below.
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NOTIFICATION  
FEB 06 2004

**Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**  
 This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.  
 Syngenta Crop Protection Inc., is submitting 2 copies (one with changes high-lighted) of labeling for Brodifacoum Technical (EPA Reg. No. 100-987) which adds the skull and cross bones symbol and "POISON" under the "Hazards to Humans and Domestic Animals" statement. This was inadvertently left off of this section of the label copy submitted on April 21, 2003, which made revisions required by EPA letter of April 3, 2003.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No			<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per Container	If "Yes" Unit Packaging wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name John L. Hott, Ph.D.	Title Regulatory Product Manager	Telephone No. (Include Area Code) 336-632-7567
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Product Manager	
4. Typed Name John L. Hott, Ph.D.	5. Date January 14, 2004	

**BRODIFACOUM TECHNICAL**

NOTIFICATION

FEB 06 2004

For formulation only into registered end-use rodenticides  
used in and around buildings and transport vehicles, and in sewers

Active Ingredient:

Brodifacoum

3-[3-(4'-bromo[1,1'-biphenyl]4-yl)-1,2,3,4-tetra-hydro-1-  
naphthalenyl]4-hydroxy-2H-1-benzopyran-2-one .....

95.00%

Other Ingredients:

5.00%

Total:

100.00%

**KEEP OUT OF REACH OF CHILDREN.****DANGER****PELIGRO****POISON**

(red type)

**Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)**

**See additional precautionary statements and directions for use on label.**

EPA Reg. No. 100-987

EPA Est. XXXX

Product of United Kingdom

SCP 987A-M(Notif 1-14-04)

Net Contents



**PRECAUTIONARY STATEMENTS****Hazards to Humans and Domestic Animals**

**DANGER/PELIGRO**  
**POISON**  
 (red type)

Fatal if swallowed, inhaled or absorbed through skin. Do not breathe dust. Do not get in eyes, on skin, or on clothing. Handle with extreme caution. Wear a full-face, air-supplied respirator; protective head, food and body covering; rubber boots and rubber gloves. Wash thoroughly with soap and water after handling and before eating or smoking. If consumed by humans, call a physician at once. Contact a physician or poison control center in all cases of suspected poisoning.

<b>FIRST AID</b>	
Contains an anticoagulant rodenticide (brodifacoum)	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15–20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15–20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b> For 24-Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident) Call <b>1-800-888-8372</b>	
<b>NOTE TO PHYSICIAN</b> This product may reduce the clotting ability of the blood and cause hemorrhaging. If poisoning occurs, intramuscular and oral administration of Vitamin K <sub>1</sub> , are indicated, as in poisoning from overdose of bishydroxy coumarin. For human cases, Vitamin K <sub>1</sub> is antidotal at doses of 10-20 mg (not mg/kg). For animal cases, Vitamin K <sub>1</sub> is antidotal at 2-5 mg/kg. Repeated doses may need to be given up to two weeks (based on monitoring of prothrombin time). In severe cases, blood transfusions may be necessary.	

**Environmental Hazards**

This product is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in a National Pollutant Discharge Elimination System (NPDES) permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of EPA.

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**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

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**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Buyer is solely responsible for any risks created by the use or uses to which it or any User puts this product. SYNGENTA CROP PROTECTION, INC. shall not be responsible for any risks caused by the incorporation of this product into an end use product by Buyer or User. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold SYNGENTA and Seller harmless for any claims relating to such factors.

SYNGENTA warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or SYNGENTA, and Buyer and User assume the risk of any such use. SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no event shall SYNGENTA or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF SYNGENTA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF SYNGENTA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

SYNGENTA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Formulators using this product are responsible for obtaining EPA registration for their formulated product.

Only for formulation into a rodenticide for:

1. Control of Norway rats, roof rats, and house mice in and around homes, industrial, commercial, and agricultural buildings, public buildings, similar man-made structures, sewers, and in and around transport vehicles (boats, ships, trains) and related port or terminal buildings.
2. Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
3. Uses for experimental purposes that are in compliance with USEPA requirements.

### STORAGE AND DISPOSAL

#### Prohibitions

Do not contaminate water, food or feed by storage or disposal.

#### Storage

Store in a locked storage area. Keep container closed when not in use. Do not store near food or feed. In case of spill or leak on floor or paved surfaces, soak up with sand, earth or synthetic absorbent. Remove to chemical waste area.

#### Pesticide Disposal

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

#### Container Disposal

**Metal Containers:** Triple rinse (or equivalent); then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Plastic Bags:** Completely empty bag into equipment; then dispose of empty bag in a sanitary landfill or by other procedures allowed by state and local authorities.

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For non-emergency (e.g. current product information) call  
Syngenta Crop Protection at 1-800-334-9481.

Syngenta Crop Protection, Inc.  
Greensboro, North Carolina 27409  
[www.syngenta-us.com](http://www.syngenta-us.com)

SCP 987A-M(Notif 1-14-04)

BRO TEC 987M(Notif 1-14-04)-ig-1-14-04



January 14, 2004

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (H7504C)  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall  
1921 Jefferson Davis Highway  
Arlington, VA 22202-4501

**Subject: Brodifacoum Technical**  
**EPA Reg. No. 100-987**  
**Notification of Correction to Label**

Dear Ms. Hobgood,

Syngenta Crop Protection Inc., is submitting 2 copies (one with changes high-lighted) of labeling for Brodifacoum Technical (EPA Reg. No. 100-987) which adds the skull and cross bones symbol and "POISON" under the "Hazards to Humans and Domestic Animals" statement. This was inadvertently left off of this section of the label copy submitted on April 21, 2003 which made revisions required by EPA letter of April 3, 2003.

The label code is SCP 987A-L(NOTIF 1-14-04).

If you have any questions please contact me at (336) 632-7096.

Sincerely,

A handwritten signature in black ink, appearing to read "John L. Hott".

John L. Hott, Ph.D.  
Regulatory Product Manager  
Regulatory Affairs

Enclosures: 2 copies of labeling (1 high-lighted with changes)  
EPA form 8570-1

cc: Daniel Peacock IRB  
Venus Eagle SAR