

Appendix A
Verification Memo for Bromadiolone



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

OFFICE OF CHEMICAL SAFETY
& POLLUTION PREVENTION

MEMORANDUM

PC Code: 112001

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SUBJECT: Verification Memorandum for Bromadiolone for SF Bay Species

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AND
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THRU: Neil Anderson, Chief
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TO: Alicia Korol, Biologist
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This memorandum serves to provide additional information on the use pattern of bromadiolone not captured in the LUIS process. RD and PRD's role in the verification process are to fill information gaps and provide division appropriate expertise as outlined in the LUIS Verification SOP for RD and PRD.

PRD provides information and status regarding changes to the chemical use (such as application parameters, cancellations, or label language) that occurred as a result of the reregistration process. RD provides information regarding changes to the chemical use that may have occurred after the date of the LUIS label extraction. In the case a "Data Doer Only"¹ report was conducted, the CRM and PM will ensure that all highest application rates are reflected on the EFED Spreadsheet. The CRM and PM have drafted the "Registration and Reregistration Verification" section of this memo to clarify knowledge gaps a risk assessor may encounter while using the data contained in the LUIS report.

If further clarification is needed please contact Rusty Wasem (305-6979 or wasem.russell@epa.gov) and John Hebert (308-6249 or hebert.john@epa.gov).

¹ This type of LUIS report is conducted when the AI of interest has more than 50 products. This report will contain:
1. Products actively registered to the data doer; 2. All technical registrations regardless of registrant; 3. All active California special local needs (SLN) registrations.

Registration and Reregistration Verification

Date and Scope of the RED and Risk Mitigation Decision for Ten Rodenticides

- First registered in 1995, Bromadiolone was included in the Rodenticides Cluster RED, which was issued in 1998. The Risk Mitigation Decision for Ten Rodenticides (RMD) that included bromadiolone was issued in June 2008. Bromadiolone is only registered to control commensal rodents in and around buildings.

Required Through the RED Process

- List any cancelled uses as part of the reregistration process.
 - 1998 RED – No uses cancelled
 - 2008 RMD – No uses cancelled
- List any rate changes that occurred as part of the reregistration process.
 - 1998 RED – No rate changes required
 - 2008 RMD – No rate changes required
- Indicate whether mitigation has been required through the reregistration process and whether any or all of the mitigation has been implemented on the product labels.
 - 1998 RED – No ecological relevant mitigation measures
 - 2008 RMD –

Consumer Product Mitigation

- Second generation anticoagulants, such as bromadiolone, are not permitted in consumer products. This will be accomplished through size restrictions and terms and conditions of registration that specify where products containing second generation anticoagulants may be sold. More information on this will be provided in the next section.

Professional Applicator Products (Agricultural & PCO) Mitigation

- **Applicator:** Professional applicators

- **Bait Form:** Meal, pellet, block, paste

- **Products:** Agricultural products must contain 8 pounds of bait or more, PCO products must contain 16 pounds of bait or more.

- **Sites:** In and within 50 feet of buildings and inside of transport vehicles

- **Bait Stations:** Mandatory for outdoor, above-ground use

- **Labeling:**

1. Add: "This product may only be used inside and within 50 feet of buildings or inside of transport vehicles (ships, trains, or aircraft)."

2. Add: "Do not sell this product in individual containers holding less than 8 pounds (Agricultural products) or 16 pounds (PCO Products) of bait."

- **Terms/Conditions of Sale/Distribution:** Product may not be sold in packaging that holds less than 8 (Agricultural products) or 16 pounds (PCO Products) of bait.

- All of the mitigation measures from the 2008 RMD have been incorporated by 32 of the 34 bromadiolone products listed in the LUIS data. Two registrations included in the LUIS data, 12455-68 and 12455-104 were cancelled on June 4, 2011. Products labeled without the RMD mitigation measures sold by rodenticide manufacturers on or before June 4, 2011, may be sold by retailers until stocks are exhausted.

- All of the active bromadiolone registrations were included in the LUIS data.

Product Reregistration

- All bromadiolone products have completed product reregistration.

Registration Division Review

- No actions have occurred since June 6, 2011 that could impact the use or application of bromadiolone (including new uses, deletion of uses, changes to application parameters, etc.). No actions are pending (i.e., new uses, increased app rates, new formulations).
- No application rates that have changed since the RED.