



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

OFFICE OF CHEMICAL SAFETY
& POLLUTION PREVENTION

MEMORANDUM

PC Code: 112701

DATE: January 19, 2011

SUBJECT: Verification Memorandum for Brodifacoum for SF Bay Species

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THRU: Laura Parsons, Team Leader *Laura Parsons*
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This memorandum serves to provide additional information on the use pattern of brodifacoum not captured in the LUIS process. RD and PRD's role in the verification process is 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 Dan Peacock (305-5407 or peacock.dan@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 1979, brodifacoum was included in the Rodenticides Cluster RED, which was issued in 1998. The Risk Mitigation Decision for Ten Rodenticides (RMD) that included brodifacoum was issued in June 2008. Brodifacoum is registered to control commensal rodents in and around buildings, in transport vehicles, in sewers, and island conservation uses that are managed by the U.S. Fish and Wildlife Service.

Required Through the RED Process

- List any cancelled uses as part of the reregistration process.
 - 1998 RED – NA
 - 2008 RMD – No uses cancelled
- List any rate changes that occurred as part of the reregistration process.
 - 1998 RED – NA
 - 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 brodifacoum, will not be 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.
- **PCO Product Sites:** In and within 50 feet of buildings and inside of transport vehicles
- **Agricultural Product Sites:** In and within 50 feet of agricultural buildings. Not permitted to be used in homes or other human residences
- **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 pounds of bait.

- All of the mitigation measures from the 2008 RMD have been incorporated by 22 of the 26 brodifacoum products. The four non-conforming products will be including the Rodenticides Notice of Intent to Cancel (NOIC) (See table below). The last day for rodenticide manufacturers to sell or distribute brodifacoum products that do not include the mitigation listed above is June 4, 2011. Products sold by rodenticide manufacturers on or before June 4, 2011, may be sold until stocks are exhausted. The brodifacoum products listed in the table below may be sold after the June 4, 2011 date and will likely remain on the market until the Agency completes the NOIC process and the registrant has exhausted all of its legal appeals.
- All of the active brodifacoum registrations were included in the LUIS data.

Product Reregistration

- EPA has completed reregistration of all products subject to the 1998 RED except the four listed below and that are now subject to a Notice of Intent to Cancel.

Registration Division Review

- No actions have occurred since December 12, 2011 that could impact the use or application of brodifacoum (including new uses, deletion of uses, changes to application parameters, etc.). No actions are pending (i.e., new uses, increased app rates, new formulations).

Brodifacoum (112701) Products Subject to NOIC That Do Not Contain RMD Mitigation Measures

Reg. No	Name	Bait Bits	Pellets	Crushed Pellet	Meal	Blocks	Paste	Powder	RMD Issues
3282-65	D- MOUSE PRUFE II		X						prohibited formulation & AI needs bait station missing 50 ft restriction
3282-66	D- PELLETS GENERATION II		X						prohibited formulation & AI needs bait station missing 50 ft restriction
3282-74	D- BAIT PELLETS II		X (PI Pack)						prohibited formulation & AI needs bait station missing 50 ft restriction
3282-81	D- READY MIXED GENERATION II			X					prohibited formulation & AI needs bait station missing 50 ft restriction