

Appendix A

Verification Memo for Difenacoum



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

OFFICE OF CHEMICAL SAFETY
& POLLUTION PREVENTION

MEMORANDUM

PC Code: 119901

DATE: January 19, 2011

SUBJECT: Verification Memorandum for Difenacoum for SF Bay Species

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AND
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THRU: Laura Parsons, Team Leader *Laura Parsons*
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TO: Nathan Miller, Biologist
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This memorandum serves to provide additional information on the use pattern of difenacoum 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 Risk Mitigation Decision for Ten Rodenticides

- First registered in the U.S. in 2007, difenacoum was not included in the 1998 Rodenticides Cluster RED, which was issued in 1998. The Risk Mitigation Decision for Ten Rodenticides (RMD) that included Difenacoum was issued in June 2008. Difenacoum is registered to control commensal rodents in and around buildings and inside of transport vehicles.

Required in the RMD

Consumer Product Mitigation

- Second generation anticoagulants, such as difenacoum, 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 all of difenacoum products. The last day for rodenticide manufacturers to sell or distribute difenacoum products that do not include the mitigation listed above was June 4, 2011. Products sold by rodenticide manufacturers on or before June 4, 2011, may be sold until stocks are exhausted.
- All of the active difenacoum registrations were included in the LUIS data.

Product Reregistration

- NA

Registration Division Review

- No actions have occurred since December 13, 2011 that could impact the use or application of Difenacoum (including new uses, deletion of uses, changes to application parameters, etc.). In July 2011, Woodstream proposed the registration of three nonconforming products containing Difenacoum. On November 3, 2011, the EPA has responded by informing the registrant, in writing, that these applications were deficient and requesting a response by January 17, 2012 of the company's next step.