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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Waiver Request Response

SUBJECT: Chlorophacinone (067707): LiphaTech request for waiver of secondary toxicity study; D283438

TO: Susan Lewis, Branch Chief
John Pates, Jr., Chemical Reviewer
Special Review and Reregistration Division

FROM: William Erickson, Biologist W. Erickson 7/23/02
Environmental Risk Branch III, Environmental Fate and Effects Division

THRU: Stephanie Irene, Acting Branch Chief Stephanie R. Irene 8/02/02
Environmental Risk Branch III, Environmental Fate and Effects Division

EFED has reviewed LiphaTech's request for a waiver of the following study:

Secondary Poisoning, Bird (70-B-SS)

Although not stated in their letter, the request apparently is for the 0.01% ai chlorophacinone bait. Secondary toxicity tests with the 0.005% ai chlorophacinone bait were submitted previously under MRID nos. 446314-01, 446314-02, and 407514-02. Residue data in a target species were submitted under MRID nos 439222-01 and 439222-02.

The following studies are required to support all outdoor uses of 0.01% ai chlorophacinone bait:

Secondary Poisoning, Mammal (70-A-SS)
Secondary Poisoning, Bird (70-B-SS)
Whole Body Residue, Target Species (70-C-SS)

As stated in the Rodenticide Cluster RED, MRID no. 427609-02 satisfies the requirement for 70-A-SS for the 0.01% ai bait. Data for whole body residues in a target species exposed to 0.01% ai bait were provided in MRID no. 439222-01. Whole-carcass residue for 10 ground squirrels was 1.27 ± 0.56 ppm. Secondary poisoning data with a predatory or scavenging bird species has not been fulfilled. Based on the residue values, predatory and scavenging birds will be exposed to chlorophacinone if they feed on target species poisoned with 0.01% ai bait. Therefore, the request for a waiver of that study is denied.