US EPA ARCHIVE DOCUMENT

December 10, 1981

Meeting ICI, EEB, EFB
PM 18

ICI has a new formulation of brodifacoum for which they are seeking registration. It is a wax block of about 300 gm weight containing 50 ppm ai. The requested site that does not appear on registered labels is sewers to which the wax block would be firmly anchored.

EEB raised the concern that the ai may impact on activated sludge treatment plants. EFB was, therefore, asked to explain why an activated sludge study would be needed.

I responded that to allay EFB concerns, the company could either do an activated sludge study or request a waiver based on information that the levels ~~that~~ of ai that would enter an activated sludge treatment plant would have no impact on the process.

Samuel M. Creeger
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