ENVIRONMENTAL FATE AND EFFECTS DIVISION
ECOLOGICAL EFFECTS BRANCH
List B Phase 4 - Response on Existing Studies Reviewed

CHEMICAL AI NAME: Brodifacoum
CHEMICAL NO.: 112701

REVIEWER'S NAME: James J. Goodyear
TELEPHONE NUMBER: 703-557-7726
DATE: January 4, 1991

USE PATTERN(S): In and around buildings.

GUIDELINE NO.: 72-2 (a) & (b). Acute toxicity test for freshwater invertebrates.

TITLE: Toxicity of the liquid concentrate, pelleted bait and technical material to first instar
Daphnia magna. Submitted by ICI Americas, Inc., Agricultural Products, Wilmington, Delaware
19897. Report No. RJ00446B. Study No. PP518/CH/01.

MRIDS AND DATES OF STUDIES REVIEWED: MRID 128442 (1978) in 92195-012

MRIDS AND DATES OF FULLY ACCEPTABLE STUDIES: None.

COMMENTS: Invalid for TEPs. Supplemental for TG LC50 = 0.98 mg/l (CI 0.9 - 1.8).

This study had been classified "Core" in 1978. The FIFRA '88 review of the data for the
technical end-use products has revealed only nominal concentrations were used. Other
Brodifacoum tests have shown that the nominal concentration can be less than half of the
measured concentration, so this method is invalid.

The Technical grade was also done with nominal levels but the FIFRA '88 Summary
provided some of the measured levels. The test was done in four sections, then the data was
pooled. This procedure is not acceptable statistically, especially since none of the nominal levels
had the same measured concentration between tests; levels had up to 4.3 times the nominal level.
There are fourteen measured levels spread among the four studies. A "Supplemental" LC50 was
calculated using these data.

They cannot be repaired because the pooling of the data is an incorrect procedure. The data are
required for both the Technical Grade of Brodifacoum and for the Typical End-use Product(s).
Therefore, the tests must be rerun and a satisfactory study reported submitted to EPA.
Summary Information For
Study 128442

MRID: 128442


Author: Getty, C.
Wilkinson, W.
Sealey, C.

Content Category: Complete primary report -- experimental research

Receipt Date: 29-Mar-1979, 30-Mar-1979

Laboratory Project #: NO PROJNR

Accession #: 237909 A, 238019 B

Products Tested: Acceptable (07-Jun-1991)
Unacceptable (07-Jun-1991)

DP #:

Ingredients

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<td>112701</td>
<td>56073-10-0</td>
<td>Brodifacoum</td>
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Total Rows: 1

Laboratory

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<td>959684</td>
<td>ICI Americas, Inc.</td>
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Total Rows: 1

http://prism.epa.gov/pls/prism10p/opp_study_query.execSTqry

8/27/2007