

US EPA ARCHIVE DOCUMENT

**ENVIRONMENTAL FATE AND EFFECTS DIVISION  
ECOLOGICAL EFFECTS BRANCH**

List B Phase 4 - Response on Existing Studies Reviewed

Re: MRID  
128442

**CHEMICAL AI NAME:** Brodifacoum  
**CHEMICAL NO.:** 112701

**CASE NO.:** 2755

**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 (1990).

**MRIDS AND DATES OF FULLY ACCEPTABLE STUDIES:** None.

**COMMENTS:** Invalid for TEPs. Supplemental for TG  $LC_{50} = 0.98$  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"  $LC_{50}$  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.



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**U.S. Environmental Protection Agency**  
Office of Pesticide Programs Information Network

**Results**

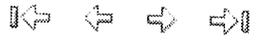
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MRID
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**Summary Information For  
Study 128442**

**MRID:** 128442

**Citation Reference:** Getty, C.; Wilkinson, W.; Sealey, C. (1978) Brodifacoum: Toxicity of the Liquid Concentrate Pelleted Bait and Technical Material to First Instar Daphnia magna: Report Series RJ0046B. (Unpublished study received Mar 29, 1974 under 10182-26; prepared by Imperial Chemical Industries Ltd., Eng., submitted by ICI Americas, Inc., Wilmington, DE; CDL:237909-A)

**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:**

**Status:** Acceptable (07-Jun-1991)  
Unacceptable (07-Jun-1991)

**DP #:**

**Ingredients**

PC Code	CAS #	Ingredient Name
112701	56073-10-0	Brodifacoum
Total Rows: 1		

**Laboratory**

Laboratory #	Laboratory Name
959684	ICI Americas, Inc.
Total Rows: 1	