

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

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In the Matter of: )  
 )  
Reckitt Benckiser LLC, et al. )  
 )  
EPA Reg. Nos. 3282-3, 3282-4, 3282-9, )  
3282-15, 3282-65, 3282-66, 3282-74, )  
3282-81, 3282-85, 3282-86, 3282-87, )  
and 3282-88; Application Nos. 3282-RNU )  
and 3282-RNL )  
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FIFRA Docket No. 661

**RESPONDENT'S REPORT OF PREHEARING EXCHANGE**

The Assistant Administrator for Chemical Safety and Pollution Prevention ("Respondent") respectfully submits, in response to the Administrative Law Judge's Prehearing Order dated February 10, 2014, its prehearing exchange of primary discovery materials:

A. Witnesses and Expected Testimony

**Susan T. Lewis**, Acting Division Director, Antimicrobial Division, Office of Pesticide Programs, EPA. From 1998 through 2009, Ms. Lewis was the Branch Chief in the Special Review and Reregistration Division responsible for coordinating the reassessment of rodenticides, among other products. Ms. Lewis managed the risk management process for the rodenticide cluster including the May 28, 2008 Risk Management Decision for Ten Rodenticides.

Ms. Lewis will testify about the evolution of EPA's efforts to reduce the risks posed by commensal rodenticide products to children, pets and non-target wildlife, and the circumstances leading to the 2008 Risk Management Decision.

Ms. Lewis will be called primarily as a fact witness, however, because regulatory agency staff are not neatly classifiable as “fact” or “expert” witnesses, she may be considered an expert witness as well. Ms. Lewis is expert in the identification and management of pesticide risks under FIFRA and the FFDCA, and her testimony may include expert opinion regarding the risks posed by rodenticide products and their management pursuant to the requirements of FIFRA.

**John D. Hebert**, Acting Branch Chief, Antimicrobial Division, Office of Pesticide Programs, EPA. From 1993 to the present date (with brief interruptions such as his current acting position), Mr. Hebert has been Product Manager, Insecticide-Rodenticide Branch, Registration Division, where he was responsible for registration decisions concerning rodenticides, among other products, including the development and implementation of the 2008 Rodenticide Mitigation Decision.

Mr. Hebert will testify about the terms and conditions of registration of the 12 rodenticide products subject to the notice of intent to cancel, the two applications for registration subject to the notice of denial, and other rodenticide products.

Mr. Hebert will be called primarily as a fact witness, however, because regulatory agency staff are not neatly classifiable as “fact” or “expert” witnesses, he may be considered an expert witness as well. Mr. Hebert is expert in the identification and management of pesticide risks under FIFRA and the FFDCA, and his testimony may include expert opinion regarding the risks posed by rodenticide products and their management pursuant to the requirements of FIFRA.

**Raymond J. Kent**, Senior Scientist, Health Effects Division, Office of Pesticide Programs, EPA. Dr. Kent has significant experience and expertise in evaluating the toxicity of pesticides and assessing the potential hazards and risks of pesticides to humans.

Dr. Kent will testify about the mammalian toxicity, and the potential hazards and risks posed to humans, of the three active ingredients (brodifacoum, difethialone, and warfarin) contained in the products subject to the Notice of Intent to Cancel. Dr. Kent will also testify about how the

potential human exposures to rodenticides not in bait stations would be treated under the Federal Food, Drug, and Cosmetic Act.

Dr. Kent will be called as an expert witness. He is an expert in evaluating and assessing the toxicity and health risks associated with pesticides, and in how EPA conducts its human health risk assessments for pesticides.

**Jeffrey J. Evans** is an Environmental Scientist in the Health Effects Division, Office of Pesticide Programs, EPA. Mr. Evans has significant experience and expertise in issues involving occupational and residential exposure to pesticides.

Mr. Evans will testify about the information EPA has with respect to exposure of children to rodenticides.

Mr. Evans will be called as an expert witness. He is an expert in issues involving occupational and residential exposure to pesticides.

**Edward W. Odenkirchen**, Senior Science Advisor, Environmental Fate and Effects Division, Office of Pesticide Programs, EPA. Dr. Odenkirchen has evaluated the toxicity of the rodenticides at issue in this proceeding, and the effects of those rodenticides on mammalian and avian species.

Dr. Odenkirchen will testify about the toxicity of the rodenticides at issue in this proceeding, and the effects of those rodenticides on mammalian and avian species.

Dr. Odenkirchen will be called primarily as an expert witness, although as a participant in the decision-making process he may also testify as a fact witness. Dr. Odenkirchen is an expert in the environmental fate and effects of pesticides, mammalian and avian toxicology, and pest and non-target wildlife behaviors.

**Sarah C. Winfield** is a Risk Assessment Process Leader (Biologist) in the Environmental Fate and Effects Division, Office of Pesticide Programs, EPA. Ms. Winfield has analyzed information available to EPA concerning domestic animals exposed to rodenticides.

Ms. Winfield will testify about the potential for domestic animals to become exposed to commensal rodenticides, and the consequences of such exposures.

Ms. Winfield will be called primarily as an expert witness, although as a participant in the decision-making process she may also testify as a fact witness. Ms. Winfield is expert in the biological effects of pesticides, and in domestic animal poisonings.

**Melissa A. Panger**, Senior Scientist (Biologist), Environmental Fate and Effects Division, Office of Pesticide Programs, EPA. Dr. Panger has analyzed information available to EPA concerning non-target wildlife exposed to rodenticides.

Dr. Panger will testify about the potential for non-target wildlife to become exposed to commensal rodenticides, and the consequences of such exposures.

Dr. Panger will be called primarily as an expert witness, although as a participant in the decision-making process she may also testify as a fact witness. Dr. Panger is expert in the risks of pesticides to non-target wildlife, and in pesticide poisoning incidents involving non-target wildlife.

**Timothy M. Kiely**, Economic Analysis Branch Chief, Office of Pesticide Programs, EPA. Mr. Kiely oversaw EPA's market research and cost analysis to estimate the economic impacts to pesticide users of cancelling non-RMD compliant pesticide products.

Mr. Kiely will testify about how EPA conducted its research and analysis, how the prices of RMD-compliant pesticide products compare to those of the products subject to cancellation, and the overall economic impact of the cancellation to consumers under a variety of household scenarios.

Mr. Kiely will be called primarily as an expert witness, although as a participant in the decision-making process he may also testify as a fact witness. Mr. Kiely is an expert in the economic analysis of regulatory actions affecting pesticide products.

**William W. Jacobs**, Biologist, Office of Pesticide Programs, EPA. Dr. Jacobs has analyzed information available to EPA concerning the efficacy of rodenticides.

Dr. Jacobs will testify about the comparative efficacy of RMD-compliant rodenticide products and the rodenticide products subject to this proceeding, giving consideration to such factors as the form of the bait, whether the bait is protected in a bait station, and the active ingredient in the bait.

Dr. Jacobs will be called as both an expert and fact witness . Dr. Jacobs is an expert on rodent behavior, rodent control, and rodent control products.

**Jim Fredericks**, Director of Technical Services with the National Pest Management Association (NPMA).

Dr. Fredericks will testify about the factors that influence the effectiveness of rodent pest management in the residential setting, and about the availability of effective pest management tools following cancellation of the affected products.

Dr. Fredericks will be called as an expert witness. Dr. Fredericks is an expert on pest management treatment protocols, including the relationship between product selection and the effectiveness of pest management practices.

**Steve Levy** is currently President and Chief Executive Officer of Bell Laboratories. Bell Laboratories is a manufacturer and marketer of rodent control products. In his capacity he oversees the Professional Pest, Agricultural & Animal Health, International and Retail divisions.

Mr. Levy will testify about the business significance, including marketing and cost considerations, of Bell Laboratories' decision to ensure that its line of rodenticide products for residential consumer use is RMD-compliant.

**Peter Martin** is currently employed as Technical Director for Bell Laboratories, Inc. in Madison Wisconsin. As Technical Director, he oversees all research and development functions including active ingredients synthesis, product development and operation of the company's biology and chemistry laboratories.

Mr. Martin will testify about the technical changes to manufacturing processes and other steps taken by Bell Laboratories, to develop a line of rodenticide products for residential consumer use that is RMD-compliant.

**Steven P. Bradbury** is the Director of the Office of Pesticide Programs at EPA. As Office Director, Dr. Bradbury was involved in the decision-making that culminated in the decision to commence a hearing process in order to cancel the products at issue in this proceeding.

Dr. Bradbury will testify about the correctness of, and rationale behind, the determinations that 1) consumer-use rodenticide products not contained in bait stations pose unreasonable risks to children, pets, and wildlife; and 2) consumer-use rodenticides containing brodifacoum or difethialone as active ingredients pose unreasonable risks to wildlife.

Dr. Bradbury will be called primarily as an expert witness, although as a participant in the decision-making process he may also testify as a fact witness. Dr. Bradbury is an expert in both the risk-assessment processes employed by the Office of Pesticide Programs and in making pesticide risk-management decisions under the Federal Insecticide, Fungicide, and Rodenticide Act and the Federal Food, Drug, and Cosmetic Act.

Dr. Bradbury announced on February 19, 2014 that he will be leaving the Office of Pesticide Programs in early March for a position in EPA's Office of Research and Development.

Respondent wants to alert the parties and the Presiding Officer that it may seek to substitute

another decision-maker for Dr. Bradbury, and will file an appropriate motion if in fact it desires to substitute a different witness.

Respondent respectfully reserves the right to supplement the list of witnesses upon adequate notice to the other parties.

B. Exhibits

A list of all documentary and physical exhibits Respondent intends to introduce into evidence is attached. In accordance with the February 25, 2014 Order on Joint Motion Concerning the Prehearing Exchange, electronic copies of all paper exhibits, and photographs of physical exhibits, have been downloaded onto flash drives that are being provided to all parties.

Respondent reserves the right to supplement the list of exhibits upon adequate notice to the other parties.

C. Official Notice

At this time, Respondent is unaware of any matters of which official notice should be taken. Respondent reserves the right to move for official notice of matters as appropriate.

D. Location and Duration of Direct Case

Respondent believes that it is appropriate that the evidentiary hearing be held in the Washington, D.C. metropolitan area. The Washington, D.C. metropolitan area is the site of the Office of Administrative Law Judges, of Respondent, Respondent's trial team, and the majority of Respondent's witnesses. It is also home to the counsel for all Petitioners and some of the Intervenors.

Respondent estimates that it can present its direct case in 48 hours if all witnesses present their direct testimony orally. If Respondent is permitted to submit written direct testimony for the majority of its witnesses (which is Respondent's preference), Respondent estimates that it can present its direct case in 6 hours

No translation services will be required for any of Respondent's witnesses.

E. Submission of Questions to the NAS

Respondent believes that there are no questions of scientific fact associated with this proceeding that should be presented to a committee of the National Academy of Sciences.

Respectfully submitted,

2/28/2014

Date

Scott B Garrison

Robert G. Perlis  
Scott B. Garrison  
David N. Berol  
U.S. Environmental Protection Agency  
Office of General Counsel (2333A)  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
perlis.robert@epa.gov; 202-564-5636  
garrison.scott@epa.gov; 202-564-4047  
berol.david@epa.gov; 202-564-6873

CERTIFICATE OF SERVICE

I hereby certify that the original and one copy of Respondent's Report of Prehearing Exchange were filed with the Headquarters Hearing Clerk, and a copy hand delivered with a flash drive containing electronic copies of all exhibits to the office of:

The Honorable Susan L. Biro  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
1300 Pennsylvania Ave., N.W.  
Washington, DC 20460

I further certify that true and correct copies of Respondent's Report of Prehearing Exchange were sent by e-mail, and hand-delivered with a flash drive containing electronic copies of all exhibits to:

Lawrence E. Culleen  
Jeremy C. Karpatkin  
Ronald A. Schechter  
Arnold & Porter LLP  
555 Twelfth Street, N.W.  
Washington, D.C. 20004  
Lawrence.Culleen@aporter.com  
Jeremy.Karpatkin@aporter.com  
Ronald.Schechter@aporter.com

Dimple Chaudhary  
Aaron Colangelo  
Natural Resources Defense Council  
1152 15th St. NW, Suite 300  
Washington DC 20005  
dchaudhary@nrdc.org  
acolangelo@nrdc.org

I further certify that true and correct copies of Respondent's Report of Prehearing Exchange were sent by e-mail, and by express-mail with a flash drive containing electronic copies of all exhibits to:

Gregory C. Loarie  
Irene V. Gutierrez  
Earthjustice  
50 California St., Suite 500  
San Francisco, CA 94111  
gloarie@earthjustice.org  
igutierrez@earthjustice.org

Steven Schatzow  
2022 Columbia Road, NW  
Suite 601  
Washington, DC 20009  
sschatzow@his.com

2/28/2014

Date

Scott B Garrison

Scott B. Garrison  
U.S. Environmental Protection Agency  
Office of General Counsel (2333A)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

**Respondent's Pre-Hearing Exchange: Index of Exhibits**

<b>Exhibit Number</b>	<b>Exhibit Title</b>
1	Curriculum Vitae for Steven Bradbury
2	Curriculum Vitae for Jeffrey Evans
3	Curriculum Vitae for James Fredericks
4	Curriculum Vitae for John Hebert
5	Curriculum Vitae for William Jacobs
6	Curriculum Vitae for Raymond Kent
7	Curriculum Vitae for Timothy Kiely
8	Curriculum Vitae for Susan Lewis
9	Curriculum Vitae for Edward Odenkirchen
10	Curriculum Vitae for Melissa Panger
11	Curriculum Vitae for Sarah Winfield
12	U.S. Environmental Protection Agency (EPA). Pesticide Registration Notice 83-5. 1983.
13	U.S. EPA. Warfarin Reregistration Eligibility Decision. 1991.
14	U.S. EPA. Pesticide Registration Notice 94-7. 1994.
15	U.S. EPA. Rodenticide Cluster Reregistration Eligibility Decision. 1998.
16	U.S. EPA. Zinc Phosphide Reregistration Eligibility Decision. 1998.
17	Rodenticide Stakeholder Workgroup, Subcommittee to the Pesticide Program Dialogue Committee. Recommendations for Managing Rodenticide Exposures to Children in the Home (Subcommittee Report to the PPDC). 2000.
18	U.S. EPA. Amendment to the Rodenticide Cluster and Zinc Phosphide Reregistration Eligibility Decision (RED) Documents. Federal Register. Vol. 66, No. 229. November 28, 2001.

Exhibit Number	Exhibit Title
19	U.S. EPA. Potential Risks of Nine Rodenticides to Birds and Nontarget Mammals: A Comparative Approach. 2004.
20	U.S. Department of the Interior. U.S. Fish and Wildlife Service. Comments on U.S. EPA's "Potential Risks of Nine Rodenticides to Birds and Nontarget Mammals: A Comparative Approach." 2005.
21	U.S. EPA. Proposed Risk Mitigation Decision for Nine Rodenticides. 2007.
22	U.S. Department of Health and Human Services (HHS). Centers for Disease Control and Prevention (CDC). National Center for Environmental Health Services. Comments on U.S. EPA's Proposed Risk Mitigation Decision for Nine Rodenticides. 2007.
23	U.S. Department of Housing and Urban Development. Office of Healthy Homes and Lead Hazard Control (OHHLHC). Comments on U.S. EPA's Proposed Risk Mitigation Decision for Nine Rodenticides. 2007.
24	West Harlem Environmental Action Coalition. Comments on U.S. EPA's Proposed Risk Mitigation Decision for Nine Rodenticides. 2007.
25	Rodenticide Registrants Task Force. Comments of the Rodenticide Registrant's Task Force in Response to EPA's Notice of Availability of EPA's Proposed Risk Mitigation Decision for Rodenticides. 2007.
26	U.S. EPA. Risk Mitigation Decision for Ten Rodenticides. 2008.
27	U.S. EPA. Draft Notice of Intent to Cancel and Draft Notice of Denial. Draft for SAP Review. 2011.
28	Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), Scientific Advisory Panel (SAP) SAP. A Set of Scientific Issues Being Considered by the Environmental Protection Agency Regarding: Scientific Conclusions Supporting EPA's FIFRA Section 6(b) Notice of Intent to Cancel Twenty Homeowner Rodenticide Bait Products. 2011.
29	U.S. EPA. EPA Response to the SAP Report "A Set of Scientific Issues Being Considered by the Environmental Protection Agency Regarding: Scientific Conclusions Supporting EPA's FIFRA Section 6(b) Notice of Intent to Cancel Twenty Homeowner Rodenticide Bait Products." 2013.
30	U.S. Department of Health and Human Services (HHS). Centers for Disease Control and Prevention (CDC). National Center for Environmental Health Services. Comments on U.S. EPA's Draft Notice of Intent to Cancel and Draft Notice of Denial. 2012

<b>Exhibit Number</b>	<b>Exhibit Title</b>
31	California Department of Pesticide Regulation. Initial Statement of Reasons and Public Report. Title 3. California Code of Regulations Amend Sections 6000 and 6400, and Adopt Section 6471 Designating Brodifacoum, Bromadiolone, Difenacoum, and Difethialone (Second Generation Anticoagulant Rodenticide Products) as Restricted Materials. 2013
32	U.S. EPA. Statement of Reasons and Factual Basis for Notice Intent to Cancel Registrations of, and Notice of Denial of Applications for, Certain Rodenticide Bait Products. 2013.
33	Application, Approval, and associated documents for EPA Registration No. 3282-3
34	Application, Approval, and associated documents for EPA Registration No. 3282-4
35	Application, Approval, and associated documents for EPA Registration No. 3282-9
36	Application, Approval, and associated documents for EPA Registration No. 3282-15
37	Application, Approval, and associated documents for EPA Registration No. 3282-65
38	Application, Approval, and associated documents for EPA Registration No. 3282-66
39	Application, Approval, and associated documents for EPA Registration No. 3282-74
40	Application, Approval, and associated documents for EPA Registration No. 3282-81
41	Application, Approval, and associated documents for EPA Registration No. 3282-85
42	Application, Approval, and associated documents for EPA Registration No. 3282-86
43	Application, Approval, and associated documents for EPA Registration No. 3282-87
44	Application, Approval, and associated documents for EPA Registration No. 3282-88
45	Application and associated documents for EPA Registration No. 3282-RNL
46	Application and associated documents for EPA Registration No. 3282-RNU
47	Image of 3282-65
48	Image of 3282-66
49	Image of 3282-74

Exhibit Number	Exhibit Title
50	Image of 3282-81
51	Image of 7173-287
52	Image of 7173-293
53	Image of 12455-123
54	Image of 12455-129
55	Gaines, Thomas. Excerpt from Acute Toxicity of Pesticides. Toxicology and Applied Pharmacology. 14, 515-534. 1969.
56	Review Report of the active substance Warfarin – European Commission; Health & Consumer Protection Directorate-General. September 2005.
57	U.S. EPA. Data Evaluation Record. Brodifacoum – Acute Oral Toxicity (Rat). 1996.
58	U.S. EPA. Data Evaluation Record. Bromadiolone, Brodifacoum, and Flocoumafen – Metabolism: Residue analysis and half-life determination. 1993.
59	Weitzel, J.N. et al. Surreptitious ingestion of a long-acting Vitamin K antagonist/rodenticide, brodifacoum: clinical and metabolic studies of three cases. Blood. 76: 2555-2559. 1990.
60	U.S. EPA. Data Evaluation Record. Brodifacoum – Prenatal Development Study (Rabbit). 1996.
61	U.S. EPA. Data Evaluation Record. Difethialone – Acute Oral Toxicity (Rat). 1985.
62	Lechevin, J.C. and Poche, R. Activity of LM 2219 (Difethialone), a new anticoagulant rodenticide in commensal rodents. Proceedings of the Thirteenth Vertebrate Pest Conference. 1988.
63	U.S. EPA. Data Evaluation Record. Difethialone – 90-day Rat Toxicity. 1989.
64	World Health Organization. Environmental Health Criteria; Anticoagulant Rodenticides – International Programme on Chemical Safety. 1995.
65	Acute risk from consumption of a single bite of rodenticide bait. Prepared by Raymond Kent, U.S. EPA.
66	1999 Annual Report of the American Association of Poison Control Centers, Toxic Exposure Surveillance System (Rodenticides can be found at page 559, PDF page 43)

Exhibit Number	Exhibit Title
67	2000 Annual Report of the American Association of Poison Control Centers, Toxic Exposure Surveillance System (Rodenticides can be found at page 380, PDF page 44)
68	2001 Annual Report of the American Association of Poison Control Centers, Toxic Exposure Surveillance System (Rodenticides can be found at page 435, PDF page 45)
69	2002 Annual Report of the American Association of Poison Control Centers, Toxic Exposure Surveillance System (Rodenticides can be found at page 401, PDF page 49)
70	2003 Annual Report of the American Association of Poison Control Centers, Toxic Exposure Surveillance System (Rodenticides can be found at page 384, PDF page 50)
71	2004 Annual Report of the American Association of Poison Control Centers, Toxic Exposure Surveillance System (Rodenticides can be found at page 664, PDF page 56)
72	2005 Annual Report of the American Association of Poison Control Centers' National Poisoning and Exposure Database (Rodenticides can be found at page 896, PDF page 94)
73	2006 Annual Report of the American Association of Poison Control Centers' National Poison Data System (Rodenticides can be found at page 881, PDF page 68)
74	2007 Annual Report of the American Association of Poison Control Centers' National Poison Data System (Rodenticides can be found at page 21 of 42, PDF page 129)
75	2008 Annual Report of the American Association of Poison Control Centers' National Poison Data System (Rodenticides can be found at page 1038, PDF page 128)
76	2009 Annual Report of the American Association of Poison Control Centers' National Poison Data System (Rodenticides can be found at pages 1121 and 1122, PDF pages 143 and 144)
77	2010 Annual Report of the American Association of Poison Control Centers' National Poison Data System (Rodenticides can be found at page 114, PDF page 146)

Exhibit Number	Exhibit Title
78	2011 Annual Report of the American Association of Poison Control Centers' National Poison Data System (Rodenticides can be found at pages 1107 and 1108, PDF pages 197 and 198)
79	2012 Annual Report of the American Association of Poison Control Centers' National Poison Data System (Rodenticides can be found at pages 1166 and 1167, PDF pages 218 and 219)
80	U.S. EPA. Overview of the Ecological Risk Assessment Process in the Office of Pesticide Programs. Endangered and Threatened Species Effects Determinations. 2004.
81	U.S. EPA. Probabilistic Analysis for the Notice of Intent to Cancel Noncompliant Rodenticide Products Containing Brodifacoum, Difethialone, Chlorophacinone, Diphacinone, Warfarin, or Bromethalin. 2013.
82	U.S. EPA. Risks of Non-Compliant Rodenticides to Nontarget Wildlife: Background Paper for Science Advisory Panel on Notice of Intent to Cancel Non-RMD Compliant Rodenticide Products. 2011.
83	Vyas, Nimish. Factors influencing estimation of pesticide-related wildlife mortality. Toxicology and Industrial Health, 15: 186-191. 1999.
84	Stroud, Richard K., and Frank Kuncir. Investigating wildlife poisoning cases. International Game Warden, Winter 2005: 8 – 13. 2005.
85	U.S. EPA. Ecological Incident Information System (EIIS). Known brodifacoum, difethialone, warfarin, diphacinone, chlorophacinone, and bromethalin ecological incidents, 1971-2013.
86	U.S. EPA. Ecological Incident Information System (EIIS). Number of Reported US Incidents in the Ecological Incident Information System (EIIS) Involving Non-target Birds and Mammals and Brodifacoum, Difethialone, Warfarin, Diphacinone, Chlorophacinone and/or Bromethalin, Primary and Secondary Exposures Table, 1971-2013.
87	WildCare's Rodenticide Diagnostics & Advocacy Program Results, 2006-2013.
88	Hosea, Robert C. Exposure of non-target wildlife to anticoagulant rodenticides in California. Proc. 19th Vertebr. Pest Conf., T.P. Salmon and A. C. Crabb, Editors, University of California, Davis. Pp. 236 – 244. 2000.
89	Gabriel MW, Woods LW, Poppenga R, Sweitzer RA, Thompson C, et al. Anticoagulant Rodenticides on our Public and Community Lands: Spatial Distribution of Exposure and Poisoning of a Rare Forest Carnivore. PLoS ONE 7(7): e40163. 2012.

Exhibit Number	Exhibit Title
90	Lima, Lorin L., and Terrell P. Salmon. Assessing some potential environmental impacts from agricultural anticoagulant uses. Proc. 24th Vertebr. Pest Conf. R. M. Timm and K. A. Fagerstone, Eds. Published at University of California, Davis. Pp. 199 – 203. 2010.
91	Madrigan, J.L., Glen C. Pixton, Bruce J. Collings, Gary M. Booth, and H. Duane Smith. A comparison of two methods of estimating bird mortalities from field-applied pesticides. Environmental Toxicology and Chemistry, 15(6): 878 – 885. 1996.
92	McMillin, Stella C., Robert C. Hosea, and Brian F. Finlayson. Anticoagulant rodenticide exposure in an urban population of the San Joaquin kit fox. Proc. 23rd Vertebr. Pest Conf., R. M. Timm and M. B. Madon, Editors, University of California, Davis. Pp. 163 – 165. 2008.
93	Murray, Maureen. Anticoagulant rodenticide exposure and toxicosis in four species of birds of prey presented to a wildlife clinic in Massachusetts, 2006 – 2010. Journal of Zoo and Wildlife Medicine, 42(1): 88 – 97. 2011.
94	Riley, Seth P., Cassity Bromley, Robert H. Poppenga, Francisco A. Uzal, Lynn Whited, and Raymond M. Sauvajot. Anticoagulant exposure and notoedric mange in bobcats and mountain lions in urban Southern California. The Journal of Wildlife Management, 71(6): 1874 – 1884. 2007.
95	Stone, Ward B., Joseph C. Okoniewski, and James R. Stedelin. Poisoning of wildlife with anticoagulant rodenticides in New York. Journal of Wildlife Diseases, 35(2): 187 – 193. 1999.
96	Stone, W. B., J. C. Okoniewski, and J. R. Stedelin. Anticoagulant rodenticides and raptors: Recent findings from New York, 1998 – 2001. Bull. Environ. Contam. Toxicol., 70: 34 – 40. 2003.
97	U.S. EPA. Compilation of Rodenticide Wildlife Mortality Incidents Reported Between 1971-2012: Compilation of Reported Wildlife Incidents Associated with Rodenticide Products Containing Brodifacoum, Difethialone, Chlorophacinone, Diphacinone, Warfarin, or Bromethalin. Environmental Fate and Effects Division, Office of Pesticide Programs, United States Environmental Protection Agency. Washington, DC. 2013.
98	California Usage and Sales Data Analysis. Pounds of AI of rodenticides sold in California from 2000 to 2011. Data from California DPR's sales database. 5/8/2013.
99	Animals that Tested Positive for a Rodenticide(s) in the Available California Monitoring Studies.
100	Blondell, Jerome, Spann, Monica. Updated Review of Rodenticide Incident Reports Primarily Concerning Children, June 3, 1999.
101	U.S. EPA. Rodenticides: Tier 2 Pet Incident Report in Support of Notice of Intent to Cancel (NOIC), D395566. 2011.

Exhibit Number	Exhibit Title
102	Merola, V. Anticoagulant Rodenticides: Deadly for Pests, Dangerous for Pets. Veterinary Medicine 97.10, 2002.
103	American Association of Poison Control Centers. Buttke DE, Schier JG, Bronstein AC, Chang A. Characterization of Animal Exposure Calls Captured by the National Poison Data System, 2000-2010. J Clin Toxicol 2:117. 2012.
104	Miller, David, Email "Requested REJV data", 2/27/2014.
105	American Society for the Prevention of Cruelty to Animals. Information obtained from ASPCA Animal Poison Control Center website (Top 10 Pet Poisons of 2010): <a href="http://www.aspc.org/pet-care/poison-control/top-10-pet-poisons-of-the-year.aspx">http://www.aspc.org/pet-care/poison-control/top-10-pet-poisons-of-the-year.aspx</a> . Accessed in 2011, but links to different content as of 2/21/14.
106	Wisner, T. Email exchange that confirms information provided in Exhibit 104. 2011.
107	Pet Poison Helpline, 2014. Top 10 Pet Poisons. <a href="http://www.petpoisonhelpline.com/pet-owners/basics/top-10-pet-poisons/">http://www.petpoisonhelpline.com/pet-owners/basics/top-10-pet-poisons/</a> Accessed 2/21/14.
108	Moorman, M. Anticoagulant Rodenticides - Now More Toxic to Pests and Pets. Veterinary Technician 23.1, 2002.
109	VPI Pet Insurance, 2011 <a href="http://www.petinsurance.com/HEALTHZONE/PET-ARTICLES/PET-HEALTH-TOXINS/MOST-COMMON-PET-POISON-CLAIMS.ASPX">http://www.petinsurance.com/HEALTHZONE/PET-ARTICLES/PET-HEALTH-TOXINS/MOST-COMMON-PET-POISON-CLAIMS.ASPX</a> accessed February 21, 2014
110	U.S. EPA. Terrestrial Residue Exposure Model (TRES) Manual <a href="http://www.epa.gov/oppefed1/models/terrestrial/trex/t_rex_user_guide.htm#Section_3_1_3">http://www.epa.gov/oppefed1/models/terrestrial/trex/t_rex_user_guide.htm#Section_3_1_3</a> , p. 1-2 and 9, accessed 2/21/14.
111	U.C. Davis Veterinary Medicine, Veterinary Medical Teaching Hospital. Email and medical report describing anticoagulant rodenticide poisoning of dog. 2014.
112	Petrus, D. J., and R. A. Henik, Pericardial effusion and cardiac tamponade secondary to brodifacoum toxicosis in a dog. Journal of the American Veterinary Medical Association. Vol 215, No. 5, September 1, 1999.
113	Cope, R.B, White, K.S., More, E, Holmes, K, Nair, A, Chauvin, P, Oncken, A. Exposure-to-treatment interval and clinical severity in canine poisoning: a retrospective analysis at a Portland Veterinary Emergency Center. J. vet. Pharmacol. Therap. 29, 233-236, 2006.

Exhibit Number	Exhibit Title
114	Letter to Mr. Richard Keigwin (EPA) from John Lublinkhof, Ph.D. (Bell Laboratories) in response to public docket EPA-HQ-OPP-2011-0718, November 15, 2011.
115	Palmateer, S.D., Tamperproof bait boxes. Unpublished report, Terrestrial and Aquatic Biology Unit, Office of Pesticide Programs, U.S. Environmental Protection Agency, Beltsville, MD. 1982.
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