

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR

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In the Matter of:)

Reckitt Benckiser LLC, et al.)

Petitioners)

FIFRA Docket No. 661

NOTICE OF ERRATA AND CORRECTED EXHIBIT LIST REGARDING
PETITIONER'S REPORT OF PRE-HEARING EXCHANGE

Reckitt Benckiser LLC ("Petitioner") hereby respectfully submits this Notice of Errata and Corrected Exhibit List regarding its filing on Friday, March 14, 2014 of Petitioner's Report of Prehearing Exchange.

That filing contained certain minor errors, as follows:

- The description for PRX 248 on the exhibit list was incorrect. The corrected description for PRX 248 is "Howald, G. R., K. R. Faulkner, et al. (2005). Eradication of black rats from Anacapa Island: biological and social considerations. Sixth California Islands Symposium, Ventura, CA, Institute for Wildlife Studies."
- The PDF provided for PRX 290 was incorrect. This incorrect PDF has been deleted from the exhibits. Instead, the live link provided in the enclosed Corrected Exhibit List should be used, pursuant to the Administrative Law Judge's Order on Joint Motion Concerning the Prehearing Exchange, February 25, 2014.
- The PDF provided for PRX 508 was incorrect. The correct document is now provided.
- PRX 526 was inadvertently produced twice, as electronic files labeled as both PRX 526 and PRX 523. The duplicate version produced as PRX 523 has now been removed. The remaining PRX 523 is as described in the enclosed Corrected Exhibit List.
- The PDF provided for PRX 1-14 was incomplete. A corrected document is now provided, including explanatory text.

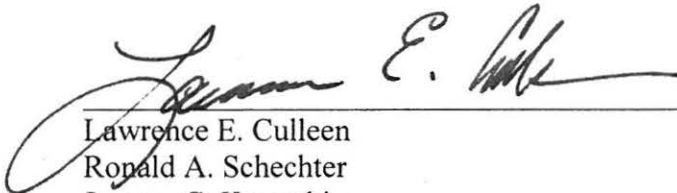
- Various non-substantive errors in the exhibit descriptions appear in the Exhibit List. These have been clarified and/or corrected. For ease of reference, the changes made are displayed in the redline comparison enclosed.

Petitioner encloses with this Notice, which has been served on all parties: 1) a Corrected Exhibit List and 2) a redline comparison showing changes to the original Exhibit List. In addition, Petitioner is providing to the Administrative Law Judge and to the Parties flash drives containing electronic copies of the complete set of exhibits (less the five CDs, previously provided, comprising Exhibits 4, 5, and 548), incorporating the corrections described above. The password to access the files

Petitioner respectfully requests that the Administrative Law Judge and the Parties consider this Notice of Errata and its enclosures in conjunction with its Report of Prehearing Exchange.

Respectfully submitted,

3.20.14
Date

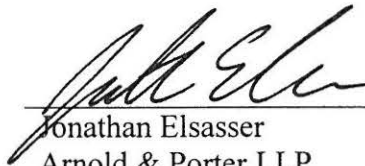


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CERTIFICATE OF SERVICE

I certify that the foregoing Notice of Errata and Corrected Exhibit List Regarding Petitioner's Report of Prehearing Exchange dated March 20, 2014, was served at the addresses listed below in the manner indicated.



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Reckitt Benckiser's Corrected Exhibit List

| Exhibit No. | Description |
|-------------|--|
| PRX 1 | Reckitt Benckiser Statement of Objections and Request for Hearing, March 6, 2013 [hereinafter "SOO"] (Exhibits Listed Below) |
| PRX 1-1 | (SOO Ex.1) Current stamped labels and artwork for all Subject Products [EPA Reg. No. 3282-03; 3282-04; 3282-09; 3282-15; 3282-65; 3282-66; 3282-74; 3282-81; 3282-85; 3282-86; 3282-87; 3282-88] |
| PRX 1-2 | (SOO Ex.2) Registration Applications for the Pending Registrations [Provisional EPA Reg. No. 3282-RNU; 3282-RNL] |
| PRX 1-3 | (SOO Ex.3) 2008 EPA Final Risk Mitigation Decision for Ten Rodenticides [As Amended June 24, 2008] |
| PRX 1-4 | (SOO Ex.4) Amended/supplemented applications and related reports for the Pending Registrations [May 20, 2011 Submittal Regarding EPA Reg. Nos. 3282-RNU and 3282-RNL] *This submission consists of the following documents: <ul style="list-style-type: none"> • 2011-05-20 Cover Letter from H. Ambuter to J. Hebert • 2011-05-20 Transmittal Letter • 3282-RNL 5/13/2011 Label • 3282-RNU 5/3/2011 Label • Vol. 1 - Preliminary Analysis: Rodenticide Exposure Trends <i>Subsequent</i> to the May 2007 Kingston Risk Mitigation Review and Post Implementation Review of the New LAAR Treatment Guidelines • Vol. 2 - Preliminary Analysis of Prevalence of Rodenticide Poisoning in the U.S. • Vol. 3 - Technical Memorandum: Preliminary Analysis of Population Trends of Selected Nontarget Organisms • Vol. 4 - Preliminary Analyses – Increasing Resistance Problems will Lead to Increases in Rodent Populations, Rodent Bites, Rodent-Associated Diseases, and Childhood Asthma Cases • Vol. 5 - Preliminary Review and Report on Impact Assessment for Proposed Rodenticide Mitigation |
| PRX 1-5 | (SOO Ex.5) Applications for label amendment for the Proposed Label Amendments (November 26, 2012). [EPA Reg. Nos. 3282-65; 3282-66; 3282-74; 3282-81 (October 1, 2012); 3282-85; 3282-86; 3282-87; 3282-88 (November 26, 2012)] |
| PRX 1-6 | (SOO Ex.6) Kaukeinen, 2007. "A White Paper Response to the Proposed EPA Mitigation Measures on Rodenticides of 1/17/2007" |
| PRX 1-7 | (SOO Ex.7) Kingston, 2007. "Analysis and Comment regarding EPA description of Human Incident Data found in the 'Impact Assessment for Proposed Rodenticide Mitigation (DP 332577)'" |
| PRX 1-8 | (SOO Ex.8) Heiden, 2007. "Economic Assessment of EPA Proposed Rodenticide Risk Mitigation Decision" |
| PRX 1-9 | (SOO Ex.9) April 20, 2012 Letter from L. Culleen to Jim Jones (with two attachments) [Concerning Sales of Bulk Products on Internet] |
| PRX 1-10 | (SOO Ex.10) September 5, 2012 Letter from L. Culleen to Jim Jones [Concerning Sales of Bulk Products on Internet] |
| PRX 1-11 | (SOO Ex.11) Submissions and presentations by Reckitt Benckiser to 2011 EPA Scientific Advisory Panel [Includes Volumes I through X] |
| PRX 1-12 | (SOO Ex.12) EPA Scientific Advisory Panel Meeting Minutes |

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| | [Dated December 29, 2011] |
| PRX 1-13 | (SOO Ex.13) December 8, 2011 Letter from L. Culleen to Steven Bradbury Regarding SAP Meeting (with two attachments, PRX 1-13-1 and 1-13-2) |
| PRX 1-14 | (SOO Ex.14) February 20, 2012 and March 14, 2012 EPA Memoranda re: "Commensal Rodenticide Products Outdoor 50 foot Restriction for Professional use Products" [Expanding Scope of Outdoor Application Sites] |
| PRX 1-15 | (SOO Ex.15) April 19, 2012 Health & Human Services Letter to E. Wachter (EPA) Regarding "Proposed Risk Mitigation Decision for Rodenticides" |
| PRX 1-16 | (SOO Ex.16) April 11, 2012 Letter from Sheryl Kunickis (USDA) to Steven Bradbury Regarding Draft NOIC |
| PRX 1-17 | (SOO Ex.17) Tomcat 16 oz. Mouse Killer I Label [EPA Reg. No. 9566.52] |
| PRX 1-18 | (SOO Ex.18) 2004 Cadmus Group Report, "A Probabilistic Risk Assessment of the Risk of Brodifacoum to Non-Target Predators and Scavengers" (1-18-A) and 2007 "Brodifacoum: Assessment Addendum" (1-18-B) |
| PRX 1-19 | (SOO Ex.19) November 23, 2011 Letter from L. Culleen to Robert Perlis Regarding Existing Stocks |
| PRX 1-20 | (SOO Ex.20) Artwork Provided to EPA by Reckitt Benckiser, October 9, 2012 [Representation for Proposed Alternative Labeling] |
| PRX 1-21 | (SOO Ex.21) Arnold & Porter FOIA Requests to EPA [2009-2013] |
| PRX 2 | Reckitt Benckiser Comments to CDPR, October 4, 2013 [<i>hereinafter</i> "RB-CDPR"] (<i>Exhibits Listed Below</i>) |
| PRX 2-1 | (RB-CDPR Ex. 1) DPR, Initial Statement of Reasons and Public Report, ("Initial Statement of Reasons") |
| PRX 2-2 | (RB-CDPR Ex. 2) DPR Memorandum from D. Daniels, Senior Environmental Scientist, to A. Prichard, Chief, Pesticide Registration Branch, <i>Subject: Second Generation Anticoagulant Rodenticide Assessment</i> (June 27, 2013) |
| PRX 2-3 | (RB-CDPR Ex. 3) DPR, Economic Impact Statement, <i>Second Generation Anticoagulant Rodenticides</i> (July 8, 2013) |
| PRX 2-4 | (RB-CDPR Ex. 4) DPR, Economic Analysis for Rulemaking, Restricting Second Generation Anticoagulant Rodenticides (June 18, 2013) |
| PRX 2-5 | (RB-CDPR Ex. 5) EPA Memorandum from A. Chiri, et al. to K. Sherman, et al., <i>Impact Assessment for Proposed Rodenticide Mitigation (DP 332577)</i> (Sep. 20, 2006) |
| PRX 2-6 | (RB-CDPR Ex. 6) Expert Report of Richard L. Wade, Ph.D., M.P.H., Exponent, Inc. (Nov. 16, 2011) |
| PRX 2-7 | (RB-CDPR Ex. 7) EPA Memorandum from A. Chiri, et al. to K. Sherman, et al., <i>Analysis of Rodenticide Bait Use</i> (Jan. 23, 2006) |
| PRX 2-8 | (RB-CDPR Ex. 8) D. Pimentel, et al., <i>Environmental and Economic Costs of Nonindigenous Species in the United States</i> at 55, <i>Bioscience</i> ; 50(1):53-65 (2000) |
| PRX 2-9 | (RB-CDPR Ex. 9) CDC, Rodents, http://www.cdc.gov/rodents (last viewed Sep. 28, 2013) |
| PRX 2-10 | (RB-CDPR Ex. 10) Jill Berg et al., <i>Rodent Allergen in Los Angeles Inner City Homes of Children with Asthma</i> , <i>Journal of Urban Health: Bulletin of the New York Academy of Medicine</i> , Vol. 85, No. 1 (2007) |
| PRX 2-11 | (RB-CDPR Ex. 11) Wanda Phipatanakul, et al., <i>Mouse allergen. I. The prevalence of mouse allergen in inner-city homes</i> , <i>Journal of Allergy and Clinical Immunology</i> , Vol. 106, No. 6 (2000) |
| PRX 2-12 | (RB-CDPR Ex. 12) Tamara Perry, et al., <i>The prevalence of rat allergen in inner-city homes and its relationship to sensitization and asthma morbidity</i> , <i>Journal of Allergy and Clinical Immunology</i> , Vol. 112, No. 2 (2003) |

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| PRX 2-13 | (RB-CDPR Ex. 13) CDC Letter Submission from S. Buchanan, Director, Div. of Emergency and Environmental Health Services to EPA Office of Pesticide Programs (May 17, 2007) |
| PRX 2-14 | (RB-CDPR Ex. 14) CDC, http://www.cdc.gov/hantavirus/hps/history.html |
| PRX 2-15 | (RB-CDPR Ex. 15) CDC, http://www.cdc.gov/hantavirus/outbreaks/yosemite-national-park-2012 |
| PRX 2-16 | (RB-CDPR Ex. 16) U.S. Department of Housing and Urban Development and Bureau of the Census, American Housing Survey for the United States: 2009, H150/09 |
| PRX 2-17 | (RB-CDPR Ex. 17) C. Wang, et al., <i>Survey of Pest Infestation, Asthma, and Allergy in Low-income Housing</i> , Journal of Community Health, Vol. 33:31-39 (2008) |
| PRX 2-18 | (RB-CDPR Ex. 18) E. Matsui., <i>Management of Rodent Exposure and Allergy in the Pediatric Population</i> , , Curr. Allergy Asthma Rep. DOI 10.1007/s11882-013-0378-4 (2013) |
| PRX 2-19 | (RB-CDPR Ex. 19) J. Childs, et al., <i>Lymphocytic Choriomeningitis Virus Infection and House Mouse (Mus Musculus) Distribution in Urban Baltimore</i> , American Journal of Tropical Medicine and Hygiene, vol. 47, 27-34 (1992) |
| PRX 2-20 | (RB-CDPR Ex. 20) E. Foster, et al., <i>Lymphocytic Choriomeningitis in Michigan</i> , Emerging Infectious Diseases, vol. 12, no. 5 (2006) |
| PRX 2-21 | (RB-CDPR Ex. 21) World Health Organization Europe, <i>Public Health Significance of Urban Pests</i> (2008) |
| PRX 2-22 | (RB-CDPR Ex. 22) James A. McCluskey, MD, PhD, MPH, <i>Analysis of the Human Health Effects of Rodenticides and Response to the 2011 Draft Notice of Intent to Cancel and Denial</i> (Nov. 15, 2011) |
| PRX 2-23 | (RB-CDPR Ex. 23) D. Kaukeinen, <i>A White Paper Response to the Proposed EPA Mitigation Measures on Rodenticides of 1/17/2007</i> (May 6, 2007) |
| PRX 2-24 | (RB-CDPR Ex. 24) R. Kingston, <i>Analysis and Comment Regarding EPA Description of Human Incident Data found in the "Impact Assessment for Proposed Rodenticide Mitigation"</i> (DP 332577) (May 16, 2007) |
| PRX 2-25 | (RB-CDPR Ex. 25) E. Heiden & S. McGonegal, <i>Economic Assessment of EPA Proposed Rodenticide Risk Mitigation Decision</i> (May 16, 2007) |
| PRX 2-26 | (RB-CDPR Ex. 26) A. Fairbrother, et al., Exponent, <i>Risks of Rodenticides to Nontarget Wildlife in California</i> (October 4, 2013) |
| 2-26-A | (RB-CDPR Ex. 26, Appendix A) Exponent, <i>Spatial Analysis of Wildlife Incident Data</i> (May 2012) |
| 2-26-B | (RB-CDPR Ex. 26, Appendix B) Exponent, <i>Variation in the Relative Prevalence of Brodifacoum, Bromadiolone, and Bromethalin in Small Mammals by Urban Land Use</i> (March 2013) |
| 2-26-C | (RB-CDPR Ex. 26, Appendix C) Clarus Research Group, <i>California Statewide Survey of d-CON Rodenticide Bait Users July-August 2013</i> (October 2013) |
| 2-26-D | (RB-CDPR Ex. 26, Appendix D) J.M. Stafford, Smithers Viscient, <i>Evaluation of Water and Food Consumption in House Mice Exposed to Bromethalin, Chlorophacinone, and Brodifacoum Bait Blocks</i> (September 27, 2013) |
| 2-26-E | (RB-CDPR Ex. 26, Appendix E) Exponent, <i>Nontarget Wildlife Diets</i> (May 2013) |
| 2-26-F | (RB-CDPR Ex. 26, Appendix F) Clarus Research Group, <i>Pest Control Operator Survey</i> (July 2012) |
| 2-26-G | (RB-CDPR Ex. 26, Appendix G) F. Gobas, <i>Terrestrial Food-Chain Bioaccumulation Potential of Bromethalin</i> (October 3, 2014) |
| PRX 2-27 | (RB-CDPR Ex. 27) Comment Letter, A. Lawyer, et al., Technology Sciences Group, to Dr. M. Verder-Carlos, Assistant Director, DPR, <i>Reckitt Benckiser: Comments on DPR White Paper : SGARs</i> (March 1, 2013) |

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| PRX 2-28 | (RB-CDPR Ex. 28) DPR Memorandum from D. Daniels, Sr. Environmental Scientist, to A. Prichard, Chief, Pesticide Registration Branch, <i>Summary of Second Generation Anticoagulant Rodenticides Assessment Peer Review Comments and Responses</i> (June 27, 2013) |
| PRX 2-29 | (RB-CDPR Ex. 29) DPR Memorandum from D. Daniels to A. Prichard, <i>Summary of Second Generation Anticoagulant Rodenticides Assessment Comments and Responses</i> (June 27, 2013) |
| PRX 2-30 | (RB-CDPR Ex. 30) California EPA, <i>Guidelines for Assessing Ecological Risks Posed by Chemicals</i> (September 2000) |
| PRX 2-31 | (RB-CDPR Ex. 31) U.S. EPA, <i>Guidelines for Ecological Risk Assessment</i> , (April 1998), EPA/630/R-95/002F |
| PRX 2-32 | (RB-CDPR Ex. 32) Guidelines for Ecological Risk Assessment, 63 Fed. Reg. 26,846 (May 14, 1998) |
| PRX 2-33 | (RB-CDPR Ex. 33) Richard K. Stroud, DVM, MS, <i>Evaluation of June 27, 2013 Memorandum from Department of Pesticide Regulation Relative to Cause of Death in Non Target Wildlife Attributable to SGARs</i> (Oct. 4, 2013) |
| PRX 2-33-A | (RB-CDPR Ex 33-A) Data used by Lima, LL and T.P Salmon, 2012 and Riley, S. 2012 Coyote Data. |
| PRX 2-33-B | (RB-CDPR Ex. 33-B) Stroud, <i>California SGAR Incident Review</i> . |
| PRX 2-33-C | (RB-CDPR Ex. 33-C) Stroud, <i>Evaluation of an Incident Report produced by Mr. Robert Hosea</i> |
| PRX 2-34 | (RB-CDPR Ex. 34) K. S. Smallwood, <i>Comparing Bird and Bat Fatality-Rate Estimates Among North American Wind-Energy Projects</i> , Wildlife Society Bulletin 37 (1) 19-33 (2013) |
| PRX 2-35 | (RB-CDPR Ex. 35) Domestic Cat Predation on Birds and Other Wildlife, American Bird Conservancy, <i>available at</i> http://www.abcbirds.org/abcprograms/policy/cats/materials/predation.pdf |
| PRX 2-36 | (RB-CDPR Ex. 36) EPA Scientific Advisory Panel (SAP), Memorandum From J. Bailey, et al., FIFRA Scientific Advisory Panel, to S. Bradbury, Ph.D., Director Office of Pesticide Programs, Transmittal of Meeting Minutes of the FIFRA Scientific Advisory Panel Meeting held Nov. 29-Dec. 1, 2011 on Scientific Conclusions Supporting EPA's FIFRA Section 6(b) Notice of Intent to Cancel Twenty Homeowner Rodenticide Bait Products (Dec. 29, 2011) |
| PRX 2-37 | (RB-CDPR Ex. 37) U.S. Fish & Wildlife Service, South Farallon Islands Invasive House Mouse Eradication Project: Draft Environmental Impact Statement at 8, Table 2.5 (August 2013) |
| PRX 2-38 | (RB-CDPR Ex. 38) A. Fairbrother, <i>Risks of Rodenticides to Nontarget Wildlife: Comments on EPA's Risk Assessment and Mitigation Options</i> (2011) |
| PRX 2-39.1 | (RB-CDPR Ex. 39.1) Technology Sciences Group, Inc., Letter Submission from A. Lawyer, Ph.D., to A. Hanger, Staff Environmental Scientist, DPR, <i>Reckitt Benckiser: Comments on Draft Regulatory Language: Second Generation Anticoagulant Rodenticides</i> (June 25, 2013) |
| PRX 2-39.2 | (RB-CDPR Ex. 39.2) Reckitt Benckiser, <i>Comments on: California Department of Pesticide Regulation's "Draft Regulatory Language for Discussion Purposes 4-3-13" Involving Second Generation Anticoagulant Rodenticides</i> (June 25, 2013) |
| PRX 2-40 | (RB-CDPR Ex. 40) DPR Product Compliance Branch, <i>Frequently Asked Questions and Answers</i> (rev. May 13, 2011) |
| PRX 2-41 | (RB-CDPR Ex. 41) DPR Press Release, "DPR collects \$1.6 million in unpaid environmental fees, penalties," (Dec. 27, 2005) |
| PRX 2-42 | (RB-CDPR Ex. 42) European Biocidal Products Forum (2013). <i>Guideline on Best Practice</i> |

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| | <i>in the Use of Rodenticide Baits as Biocides in the European Union</i> . European Chemical Industry Council (Cefic) (Sept. 2013) at 15. |
| PRX 2-43 | (RB-CDPR Ex. 43) ASPCRO/NPMA, <i>Rodenticide Use of Pest Management Professionals</i> (2013) |
| PRX 2-44 | (RB-CDPR Ex. 44) M. Bartos, et al., <i>Use of Anticoagulant Rodenticides in Single-Family Neighborhoods Along an Urban-Wildland Interface in California</i> , <i>Cities and the Environment</i> (CATE), vol. 4, iss. 1 (2012) |
| PRX 2-45 | (RB-CDPR Ex. 45) EPA Office of Pesticide Programs, <i>Biopesticides Registration Action Document, Cellulose</i> , PC Code: 100154 (Oct. 15, 2012), available at regulations.gov, ID# EPA-HQ-OPP-2012-0128-0009 |
| PRX 2-46 | (RB-CDPR Ex. 46) J. Lyon, EAS Consulting Group LLC, <i>Use of Rodenticides in U.S. Foodservice and Retail Food Establishments</i> at (Oct. 4, 2013) |
| PRX 2-46-A | (RB-CDPR Ex. 46, Appendix A) CV of Jeanette B. Lyon |
| PRX 2-46-B | (RB-CDPR Ex. 46, Appendix B) ASPCRO/NPMA, <i>Rodenticide Use Survey of Pest Management Professionals</i> (January 2013) |
| PRX 2-46-C | (RB-CDPR Ex. 46, Appendix C) Clarus Research Group, <i>Pest Control Operator Survey</i> (July 2012) |
| PRX 2-47 | (RB-CDPR Ex. 47) M. Bandurraga, EAS Consulting Group LLC, <i>Use of Rodenticides as Part of Overall Pest Control Practices in Food Manufacturing and Warehouse Sites</i> at 3, 6-9 (Oct. 1, 2013) |
| PRX 2-47-A | (RB-CDPR Ex 47, Appendix A) CV of Maury Melanie Bandurraga |
| PRX 2-47-B | (RB-CDPR Ex 47, Appendix B) Clarus Research Group, <i>California Statewide Survey of d-CON Rodenticide Bait Users July-August 2013</i> (October 2013) |
| PRX 2-47-C | (RB-CDPR Ex. 47, Appendix C) EPA Letter to Reckitt Benckiser regarding Label Notification for Pesticide Registration Notice 2007-4 and 98-10 (October 31-2008) |
| PRX 2-47-D | (RB-CDPR Ex. 47, Appendix D) O'Connor-Marer, <i>Chapter 2: Residential, Industrial, and Institutional Pest Control</i> , <i>Pesticide Application Compendium</i> , Second Edition. University of California Statewide Integrated Pest Management Program, Agriculture and Natural Resources Publication, 2006, pp. 152. |
| PRX 2-48 | (RB-CDPR Ex. 48) EPA Memorandum from D. Brady, et al. to S. Bradbury, <i>EPA Response to answer SAP Comments provided in SAP Minutes No 2011-06, 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</i> (Jan. 29, 2013) |
| PRX 2-49 | (RB-CDPR Ex. 49) A. Fairbrother, <i>Variation in the Relative Prevalence of Brodifacoum, Bromadiolone, and Bromethalin in Small Mammals by Urban Land Use</i> (March 2013) |
| PRX 2-50 | (RB-CDPR Ex. 50) A. Morzillo & A. Mertig, <i>Urban Resident Attitudes Toward Rodents, Rodent Control Products, and Environmental Effects</i> , <i>Urban Ecosys.</i> vol. 14: 243-60 (2011) |
| PRX 2-51 | (RB-CDPR Ex. 51) A. Morzillo & M. Schwartz, <i>Landscape Characteristics Affect Animal Control by Urban Residents</i> , <i>esa Ecosphere</i> , vol.2(11) (2011) |
| PRX 2-52 | (RB-CDPR Ex. 52) E. Arndt, <i>Urban Business Attitudes Regarding Rodents, Rodent Control Methods, and Impact on Wildlife</i> (May 3, 2012) |
| PRX 2-53 | (RB-CDPR Ex. 53) Morzillo and Mertig, <i>Linking Human Behaviour to Environmental Effects</i> , <i>Int'l J. of Env'tl. Studies</i> , vol. 68, No. 1 (2011). |
| PRX 2-54 | (RB-CDPR Ex. 54) Y. Baruch & C. Holton, <i>Survey Response Rate Levels and Trends in Organizational Research</i> , 61, <i>Human Relations</i> (2008) |
| PRX 2-55 | (RB-CDPR Ex. 55) Clarus, <i>Preliminary Report of Pest Control Operator Survey Data</i> (July 2012) |
| PRX 2-56 | (RB-CDPR Ex. 56) Clarus, <i>California Statewide Survey of d-CON Rodenticide Bait Users</i> |

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| | (July-August 2013) |
| PRX 2-57 | (RB-CDPR Ex. 57) Letter from L. Culleen to Hon. J. Jones re Bulk Online Sales (with attachments) (Apr. 20, 2012) |
| PRX 2-58 | (RB-CDPR Ex. 58) Letter from L. Culleen to Hon. J. Jones re Bulk Online Sales (Sept. 5, 2012) |
| PRX 2-59 | (RB-CDPR Ex. 59) http://www.pestmall.com/jt-eaton-bait-block-peanut-butter-flavor-9-lbs.html ; (internet site advertising 9 pound container of rodenticide) |
| PRX 2-60 | (RB-CDPR Ex. 60) http://tinyurl.com/mdp5trv ; (internet site advertising 12 pound bucket of brodifacoum product) |
| PRX 2-61 | (RB-CDPR Ex. 61) A. Buckle, <i>Review of Rodenticide Regulation in the United Kingdom and the European Union</i> , October 2013 |
| PRX 2-62 | (RB-CDPR Ex. 62) UK Health and Safety Executive (HSE), <i>Environmental Risk Mitigation Measures for Second Generation Anticoagulant Rodenticides</i> (August 2012) |
| PRX 2-63.1 | (RB-CDPR Ex. 63.1) Department of Pesticide Regulation, Second Generation Anticoagulant Rodenticides Meeting With Registrants Agenda, February 26, 2013 |
| PRX 2-63.2 | (RB-CDPR Ex. 63.2) DPR, <i>Second Generation Anticoagulant Registration, Sales & Use Information</i> (February 25, 2013) |
| PRX 2-63.3 | (RB-CDPR Ex. 63.3) DPR, Untitled Chart (February 25, 2013) |
| PRX 2-64 | (RB-CDPR Ex. 64) Applied Safety + Ergonomics, <i>Reckitt Benckiser Rodenticide Labeling Evaluation: Preliminary Report</i> (Oct. 3, 2013) |
| PRX 2-65 | (RB-CDPR Ex. 65) Caravati et al., <i>Long-Acting Anticoagulant Rodenticide Poisoning: An Evidence-Based Consensus Guideline for Out of Hospital Management</i> , 45 <i>Clinical Toxicology</i> 1 (2007) |
| PRX 2-66 | (RB-CDPR Ex. 66) R. Kingston, PharmD, <i>Impact of the California Department of Pesticide Regulation's Proposed Regulatory Action Classifying Second Generation Anticoagulant Rodenticides as Restricted Materials</i> (Oct. 4, 2013) |
| PRX 2-66-A | (RB-CDPR Ex 66, Exhibit A) CV of Richard L. Kingston |
| PRX 2-66-B | (RB-CDPR Ex. 66, Exhibit B) Brutlag et al., <i>Pet poisonings involving new, EPA-approved bromethalin rodenticides: Implications for pets and humans</i> . 2013 Annual Meeting of the NACCT. |
| PRX 2-66-C | (RB-CDPR Ex. 66, Exhibit C) Borron et al., <i>Bromethalin (BR) vs. long-acting anticoagulant (LAAC) rodenticides: A 10-year comparison of exposures and toxicity</i> . 2013 Annual meeting of the NACCT. |
| PRX 2-67 | (RB-CDPR Ex. 67) A. Brutlag, DVM, MS, DABT, DABVT, <i>Critical Evaluation of the Impact of the California Department of Pesticide Regulation's Proposed Regulation, DPR 13-002, Designating Second Generation Anticoagulant Rodenticide Products as Restricted Materials</i> (Oct. 4, 2013) |
| PRX 2-67-A | (RB-CDPR Ex. 67, Appendix A) Author Qualification/Bibliography |
| PRX 2-67-B | (RB-CDPR Ex. 67, Appendix B) Scientific Literature Search |
| PRX 2-67-C | (RB-CDPR Ex. 67, Appendix C) Pet Poison Helpline's educational efforts focused on rodenticides. |
| PRX 2-67-D | (RB-CDPR Ex. 67, Appendix D) Examples of publically available scientific literature citing rodenticide toxic doses for dogs and cats. |
| PRX 2-67-E | (RB-CDPR Ex. 67, Appendix E) Pet-related charge questions posed by the EPA to the Scientific Advisory Panel |
| PRX 2-67-F | (RB-CDPR Ex. 67, Appendix F) Survey of Veterinarians |
| PRX 2-67-G | (RB-CDPR Ex. 67, Appendix G) Preliminary Report of Pet Poison Helpline Study |
| PRX 2-67-H | (RB-CDPR Ex. 67, Appendix H) Recent publications by veterinarians and veterinary organizations opposing EPA decision to restrict SGAR use. |
| PRX 2-67-I | (RB-CDPR Ex. 67, Appendix I) Author's <i>Curriculum Vitae</i> |

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| PRX 2-68 | (RB-CDPR Ex. 68) A. Brutlag, DVM, MS, and L. Hovda, RPH, DVM, MS, DACVIM, <i>Impact of EPA's Notice of Intent to Cancel and Notice of Denial of Registrations for Certain Rodenticide Bait Products on Domestic Animals</i> (2011) |
| PRX 2-69 | (RB-CDPR Ex. 69) R. Kingston, PharmD, <i>Response to EPA's Notice of Intent to Cancel and Notice of Denial of Registrations for Certain Rodenticide Bait Products</i> (Nov. 15, 2011) |
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| PRX 2-71 | (RB-CDPR Ex. 71) A. Buckle, <i>Comparative Efficacy of Rodenticides: Impacts and Implications of the California Department of Pesticide Regulation's Proposal to Reclassify Second Generation Anticoagulants as Restricted Materials</i> (October 2013) |
| PRX 2-71-1 | (RB-CDPR Ex. 71, Appendix 1) G. Murphy and A. Felix-Thomas, <i>The influence of bait presentation on bait consumption by urban mice (Mus domesticus) in UK domestic dwellings</i> (2013). |
| PRX 2-71-2 | (RB-CDPR Ex. 71, Appendix 2) C. V. Prescott, <i>The Probit Dose Response for chlorophacinone using the Blood Clotting Response methodology, generated against male albino (CD1) susceptible House mice and male resistant House mice that are homozygous for the VKORC1 mutation Tyr139Cys (VPU/12/013)</i> (2013). |
| PRX 2-71-3 | (RB-CDPR Ex. 71, Appendix 3) C. V. Prescott, <i>The Probit Dose Response for diphacinone using the Blood Clotting Response methodology, generated against male albino (CD1) susceptible House mice and male resistant House mice that are homozygous for the VKORC1 mutation Tyr139Cys (VPU/12/013)</i> (2013). |
| PRX 2-71-4 | (RB-CDPR Ex. 71, Appendix 4) C. V. Prescott, <i>Efficacy assessment of a 50 ppm diphacinone formulation - 15 day choice test, using Standard EPA Meal as the challenge diet, against male resistant house mice that are homozygous for the VKORC1 mutation Tyr 139Cys (GB01-13-R046)</i> (2013). |
| PRX 2-71-5 | (RB-CDPR Ex. 71, Appendix 5) C. V. Prescott, <i>Estimation of the warfarin resistance factor for male resistant house mice that are homozygous for the VKORC1 mutation Tyr139Cys, by comparing the Effective Dose generated using the Blood Clotting Response (BCR) methodology with that of a susceptible strain (VPU/12/013)</i> (2013). |
| PRX 2-71-6 | (RB-CDPR Ex. 71, Appendix 6) C. V. Prescott, <i>Efficacy assessment of a 500 ppm warfarin formulation - 15 day choice test, using Standard EPA Meal as the challenge diet, against male resistant house mice that are homozygous for the VKORC1 mutation Tyr 139Cys (GB01-13-R046)</i> (2013) |
| PRX 2-71-7 | (RB-CDPR Ex. 71, Appendix 7) C. V. Prescott, <i>Estimation of the brodifacoum resistance factor for male resistant house mice that are homozygous for the VKORC1 mutation Tyr139Cys, by comparing the Effective Dose generated using the Blood Clotting Response (BCR) methodology with that of a susceptible strain (VPU/12/013)</i> (2013) |
| PRX 2-71-8 | (RB-CDPR Ex. 71, Appendix 8) J. Stafford, <i>Evaluation of Water and Food Consumption in House Mice Exposed to Bromethalin, Cholorphacinone, and Brodifacoum Bait Blocks</i> (Sept. 27, 2013). |
| PRX 2-71-9 | (RB-CDPR Ex. 71, Appendix 9) J. Stafford, <i>Comparative Efficacy of Bromethalin Block Baits with and without Bait Stations against Wild-Caught Norway Rats (Rattus norvegicus)</i> (Sept.24, 2013). |
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| PRX 2-74 | (RB-CDPR Ex. 74) H.J. Pelz, and M. Kohn, <i>Impact of Resistance to Anticoagulant Rodenticides in Rats and House Mice on the Efficacy of Control Measures, Report Prepared for the EPA FIFRA Scientific Advisory Panel</i> (Nov. 16, 2011) |
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| PRX 2-76 | (RB-CDPR Ex. 76) M.H. Kohn, <i>A survey of non-synonymous Vkorc1 polymorphisms that mediate resistance to select anticoagulant rodenticides (FGARs) in the house mouse (Mus musculus domesticus) in the U.S.</i> (Oct. 2013) |
| PRX 2-77 | (RB-CDPR Ex. 77) G. Murphy, and A. Felix-Thomas, <i>The Influence of bait presentation on bait consumption by urban mice (Mus doemsticus) in domestic dwellings</i> , University of Salford |
| PRX 2-78 | (RB-CDPR Ex. 78) http://www.cdfa.ca.gov/statistics/ |
| PRX 2-79 | (RB-CDPR Ex. 79) http://stuffaboutstates.com/california/agriculture.htm |
| PRX 2-80 | (RB-CDPR Ex. 80) C. Danner & W. Hamm, Berkeley Research Group, <i>Economic Analysis of the California Department of Pesticide Regulation Proposal to Restrict Second Generation Rodenticides</i> (Oct. 4, 2013) |
| PRX 2-81 | (RB-CDPR Ex. 81) U.S. EPA, Office of Pesticide Programs, <i>Statement of Reasons and Factual Basis for Notice Intent to Cancel Registrations of, and Notice of Denial of Applications for, Certain Rodenticide Bait Products</i> (Jan. 29, 2013) |
| PRX 2-82 | (RB-CDPR Ex. 82) Edward Wyatt, <i>.Most of U.S. Is Wired, but Millions Aren't Plugged In.</i> , The New York Times (Aug. 18, 2013) |
| PRX 2-83 | (RB-CDPR Ex. 83) Federal Deposit Insurance Commission, <i>Key Overall Findings: The 2011 National Survey of Unbanked and Underbanked Households</i> (2011) |
| PRX 2-84 | (RB-CDPR Ex. 84) Statement of Laurent Faracci Regarding Cost Impact to d-CON of CDPR Proposal to Classify Second Generation Anti-Coagulant Rodenticides as Restricted Materials |
| PRX 2-85 | (RB-CDPR Ex. 85) PREC Charter |
| PRX 2-86 | (RB-CDPR Ex. 86) Analysis, SB 1021 relating to Agricultural Chemicals, as amended in Senate (June 25, 1971) |
| PRX 2-87 | (RB-CDPR Ex. 87) Cal. Dep't of Finance, Enrolled Bill Report SB 1021 (Oct. 28, 1971) |
| PRX 2-88.1 | (RB-CDPR Ex. 88.1) Cadmus Group, <i>A Probabilistic Risk Assessment of the Risk of Brodifacoum to Nontarget Predators and Scavengers</i> (2004) |
| PRX 2-88.2 | (RB-CDPR Ex. 88.2) Cadmus Group Report, <i>Brodifacoum: Assessment Addendum</i> (2007) |
| PRX 2-89 | (RB-CDPR Ex. 89) R. Cantor and J. Schmier, <i>Preliminary Review and Report on Impact Assessment for Proposed Rodenticide Mitigation</i> (May 18, 2011) |
| PRX 2-90 | (RB-CDPR Ex. 90) Expert Report of Richard L. Wade, Ph.D., M.P.H. (<i>Discussion of the Public Health Implications of the Planned EPA Action</i>) (October 4, 2013) |
| PRX 2-91 | (RB-CDPR Ex. 91) H. Ambuter, <i>Economic Concerns Created by EPA's Draft Notice of Intent to Cancel 20 Consumer Use Rodenticides</i> (Submission to U.S. EPA Scientific Advisory Panel, Nov. 16, 2011) |
| PRX 3 | Documents Provided to EPA in October 9, 2012 Meeting with Jim Jones (Table of Contents) |
| PRX 3-1 | 1 - Reckitt Benckiser d-CON Products Presentation (Updated 10/9/2012) *This document contains CBI. |
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| PRX 3-4 | 4 - Photo of In-store Display *This document contains CBI. |
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| PRX 3-8-D | 8D - Label Amendments for d-CON Ready Mixed Baitbits (EPA Reg. No. 3282-81) *This document contains CBI. |
| PRX 3-9 | 9 - Reckitt Benckiser Letter to Richard Keigwin Re: Follow up to August 2012 Meeting with Reckitt Benckiser (Sept, 17, 2012) *This document contains CBI. |
| PRX 4 | (1) CD Containing Incident Reports |
| PRX 5 | (3) CDs Containing Audio Transcript of SAP Meeting, November 29, 2011-December 1, 2011, provided by Joseph Bailey, EPA, Designated Federal Official, Office of Science Coordination and Policy. |
| PRX 6 | Transcript of SAP Meeting prepared by Arnold & Porter LLP from audio CDs (PRX 5) provided by Joseph Bailey, EPA, Designated Federal Official, Office of Science Coordination and Policy, November 29, 2011-December 1, 2011. |
| PRX 7 | Jones, L., <i>Coyotes Move into Colorado's Front Range</i> , High Country News. URL: < http://www.hcn.org/issues/42.22/coyotes-overtake-colorados-suburban-front-range/article_view?b_start:int=0 >. Accessed 2/21/14. |
| PRX 8 | U.S. EPA, <i>Explanation of Statutory Framework for Risk-Benefit Balancing for Public Health Pesticides</i> . Available on-line at URL: http://epa.gov/pesticides/health/risk-benefit.htm (Accessed 2-25-14). |
| PRX 9 | U.S. EPA Pesticide Registration Notice 2002-1, <i>Notice to Manufacturers, Formulators, Producers Registrants and Applicators of Pesticide Products</i> |
| PRX 10 | EPA Memorandum from Shanna Recore to David Miller, re: Rodenticides Tier II: Review of Human Incidents (Oct. 28, 2011). |
| PRX 11 | d-CON Quarter Pallet (Mockup) |
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| PRX 90 | Excerpts from EPA SAP Presentation on Pet Incident Analysis (pp.7-10) |
| PRX 91 | Almeida, Anthony, Robert Corrigan, and Ronald Sarno, <i>The Economic Impact of Commensal Rodents on Small Businesses in Manhattan's Chinatown: Trends and Possible Causes</i> , Scholar Commons 1.1 (2013): University of South Florida, 3 Apr. 2013., available at http://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1000&context=subsust .(last visited Feb. 26, 2014). |
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| PRX 93 | Gobas, 2013. Terrestrial Food-Chain Bioaccumulation Potential of Bromethalin. |
| PRX 94 | Ingels et al, 2002. A Prospective Study of Acute, Unintentional Pediatric Superwarfarin Ingestions Managed Without Decontamination. <i>Annals of Emergency Medecine</i> . July 2002, pp.73-78. |
| PRX 95 | Mullins et al, 2000. Unintentional Pediatric Superwarfarin Exposures: Do We Really Need a Prothrombin Time? <i>Pediatrics</i> 2000; 105:402. |
| PRX 96 | Shepherd et al, 2002. Acute unintentional pediatric brodifacoum ingestions. <i>Pediatric Emergency Care</i> . Vol. 18, No. 3. |
| PRX 97 | J. Karpatkin, EPA FOIA Request Letter (00185-12) (Oct. 31, 2011) |
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| PRX 147 | Memorandum from Bill Jacobs to Kelly Sherman, First Generation and Second Generation Anticoagulants: Resistance and Other Efficacy Issues (April 24, 2008). |
| PRX 148 | California Roadkill Observation System Database http://www.wildlifecrossing.net/california/map/roadkill |
| PRX 149 | Screenshot of California Roadkill Observation System Webpage. (Accessed March 10, 2014). |
| PRX 150 | U.S. EPA, <i>Science Policy Issues and Guidance Documents</i> , http://www.epa.gov/pesticides/trac/science/#fqpa . (accessed 3/10/14) |

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| PRX 151 | Email from Mike Mahler, The Home Depot, to Ron Evans, Reckitt Benckiser (Aug. 11, 2010), transmitting a notice that Mahler believed was authored by the New York State Department of Environmental Conservation. Investigation revealed that the notice actually was authored and distributed by Motomco. |
| PRX 152 | Prescott, C.V., <i>Efficacy assessment of a 50 ppm bromadiolone formulation - 15 day choice test, using Standard EPA Meal as the challenge diet, against male resistant house mice that are homozygous for the VKORC1 mutation Tyr139Cys</i> University of Reading, VPU/13/026 (2014). |
| PRX 153 | PR Notice 94-7, http://www.epa.gov/PR_Notices/pr94-7.html (last visited 3/13/14). |
| PRX 154 | EPA OPP Laboratory Test Methods; OPP Designations: 1.203, 1.204, 1.209, 1.210, 1.213, 1.214, 1.217 |
| PRX 155 | Environmental Fact Sheet, <i>Risk/Benefit Balancing Under the Federal Insecticide, Fungicide, and Rodenticide Act</i> , Office of Pesticides and Toxic Substances, U.S. EPA, Washington, D.C. (Feb. 1990). |
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| PRX 164 | Richard L. Kingston CV |
| PRX 165 | Ahna G. Brutlag CV |
| PRX 166 | James Davis McCluskey CV |
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| PRX 168 | James V. Hillman CV |
| PRX 169 | Beth E. Mileson CV |
| PRX 170 | Robert H. Poppenga CV |
| PRX 171 | Bradford David Gessner CV |
| PRX 172 | Carolyn B. Meyer CV |
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| PRX 179 | Steven M. Hall CV |
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| PRX 297 | Photograph of Contrac All Weather Blox Bait Bucket (18 lb) |
| PRX 298 | Photograph of Farham JustOneBite II Bars (8 lb) |
| PRX 299 | Photograph of Havoc Bait Bucket (8.2 lb) |
| PRX 300 | Photograph of Liphatech First Strike Soft Bait Bucket (8 lb) |
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| PRX 305 | AAPCC Data (2010-2011) - Bromethalin |
| PRX 306 | AAPCC Data (2010-2011) - Long Acting Anticoagulants |
| PRX 307 | Estimated exposure quantities from the 2010-2011 AAPCC data. Prepared by Dr. Richard Kingston. |
| PRX 308 | AAPCC SGARs Trends 1989-2011, chart. Prepared by Dr. Richard Kingston. |
| PRX 309 | AAPCC SGAR Trends 1989-2011, graph. Prepared by Dr. Richard Kingston. |
| PRX 310 | Data from AAPCC Annual Reports (2006-2011). Prepared by Dr. Richard Kingston. |
| PRX 311 | Percentage of Symptomatic Exposures Over a Six-year Period (2006-2011). Prepared by Dr. Richard Kingston. |
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| PRX 328 | Photograph of a dog-resistant bait station (Tier 1 or 2) chewed apart by a 2 year old Rottweiler in California. |
| PRX 329 | Comparison of SGAR and bromethalin rodenticide cases documented by Pet Poison Helpline (PPH) between July 2009 and December 2013. Prepared by Dr. Ahna Brutlag. (PRX 329 is a reformatted version of PRX 333) |
| PRX 330 | Costs associated with treatment for asymptomatic and symptomatic pet exposures involving various rodenticides. Prepared by Dr. Ahna Brutlag. |
| PRX 331 | Veterinary treatment plans and cost estimates associated with treatment for asymptomatic and symptomatic pet exposures involving various rodenticides. Prepared by Dr. Katherine Peterson and Dr. Ahna Brutlag. |
| PRX 332 | CDPR Domestic Animal and Wildlife Adverse Effects Reporting Data for bromethalin spanning the reporting period of August 1, 2011-September 11, 2013. Prepared by Dr. Ahna Brutlag. |
| PRX 333 | Comparison of SGAR and bromethalin rodenticide cases documented by Pet Poison Helpline (PPH) between July 2009 and December 2013. Prepared by Dr. Ahna Brutlag. |
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| PRX 384 | NYC Asthma Data Survey 2008 |
| PRX 385 | Figure 1. Percent of homes with detectable mouse allergen, by study and collection site. Prepared by Brad Gessner. |
| PRX 386 | Figure 2. Median home mouse allergen level, by study and collection site. Prepared by Brad Gessner. |
| PRX 387 | Figure 3. Percent of persons with asthma sensitized to home. Prepared by Brad Gessner. |
| PRX 388 | Figure 4. Among studies that stratified by asthma status or included total population results, percent sensitized to mouse allergen. Prepared by Brad Gessner. |
| PRX 389 | Figure 5. Odds ratio of relationship between rodent sensitization (versus no sensitization) and allergy/asthma symptoms among laboratory workers. Prepared by Brad Gessner. |
| PRX 390 | Figure 6. Odds ratio or prevalence ratio of relationship between exposure level and any asthma or allergy symptoms among laboratory workers. Prepared by Brad Gessner. |
| PRX 391 | Figure 7. Association between asthma or allergy and mouse or rat sensitization. Prepared by Brad Gessner. |
| PRX 392 | Figure 8. Association between mouse or rat sensitization and asthma complications. Prepared by Brad Gessner. |
| PRX 393 | Figure 9. Population attributable fraction (PAF) and risk (PAR) for mouse or rat sensitization and asthma or allergy. Prepared by Brad Gessner. |
| PRX 394 | Figure 10. Population attributable fraction (PAF) or risk (PAR) for mouse or rat |

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| PRX 395 | Figure 11. Simplified rodent transmission model. Prepared by Brad Gessner. |
| PRX 396 | Figure 12. Proportion of total rodenticide poisoning cases with different outcomes; National Poison Data System, 2005-11. Prepared by Brad Gessner. |
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| PRX 401 | Figure 17. Current asthma prevalence among the US population age 6+ years. Prepared by Brad Gessner. |
| PRX 402 | Figure 18. Mean total serum IgE in kU/L with standard error among US residents age 6+ years. Prepared by Brad Gessner. |
| PRX 403 | Figure 19. Percent (with standard error) of US residents age 6+ years with allergy outcomes. Prepared by Brad Gessner. |
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| PRX 405 | Figure 21. Percent of Puerto Rican children in Hartford with differing levels of home mouse allergen concentration, by income level. Prepared by Brad Gessner. |
| PRX 406 | Figure 22. Percent of Puerto Rican children in Puerto Rico with differing levels of home mouse allergen concentration, by income level. Prepared by Brad Gessner. |
| PRX 407 | Figure 23. Crude and adjusted odds ratios (with 95% CI) for high levels of bedroom mouse allergen levels in Boston. Prepared by Brad Gessner. |
| PRX 408 | Figure 24. Crude odds ratios (and 95% CI) for mouse allergen sensitization in Boston. Prepared by Brad Gessner. |
| PRX 409 | Figure 25. Proportion of US Households with Evidence of Rats. Prepared by Brad Gessner. |
| PRX 410 | Figure 26. Proportion of US Households with Evidence of Rats Without 2011 Data. Prepared by Brad Gessner. |
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| PRX 413 | Table 1. Risk factors for detectable mouse allergen or higher concentrations of mouse allergens reported in 10 studies. Prepared by Brad Gessner. |
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