



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 6, 2016

Veronica Semetis Lawless
Farnam Companies, Inc.
1501 E. Woodfield Rd, Suite 200W
Schaumburg, IL 60173

Subject: Label Amendment – Response to Agency Initiated Action- Revising First Aid Statements, Hazards to Humans and Domestic Animals section, and PPE section
Product Name: Bromadiolone 2.5% Concentrate
EPA Registration Number: 270-371
Application Date: December 31, 2015
Decision Number: 512670

Dear Ms. Lawless:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Jessica Rogala by phone at 703-347-0263, or via email at rogala.jessica@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Marianne Lewis". The signature is written in a cursive style with a large, prominent "L" at the end.

Marianne Lewis,
Acting Product Manager 07
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

ACCEPTED

Jan 06, 2016

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 270-371

BROMADIOLONE 2.5% CONCENTRATE

A rodenticide only for formulation into other registered products for use in and around structures and inside transport vehicles to kill Norway rats, roof rats, and house mice

ACTIVE INGREDIENT:

Bromadiolone 3-[3-(4'-bromo [1,1'-biphenyl]-4-yl)-3-hydroxy-1-phenylpropyl]-4-hydroxy-2H-1-benzopyran-2-one 2.5%

OTHER INGREDIENTS: 97.5%

TOTAL: 100.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER/PELIGRO**



POISON

See side panels for additional Precautionary Statements

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a Poison Control Center or doctor for further treatment advice.
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a Poison Control Center or doctor for treatment advice.
HOTLINE NUMBER Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact CHEMTREC (800) 424-9300 (24 hours) for emergency medical treatment information.	
NOTE TO PHYSICIAN If swallowed, absorbed or inhaled, this product will reduce the clotting ability of the blood and will cause bleeding. In such cases, treat as in bishydroxycoumarin overdoses, giving Vitamin K, intramuscularly or orally in mild cases or intravenously with blood transfusions in severe cases. Repeat as necessary based on monitoring of prothrombin times.	
Note to Veterinarian: Contains bromadiolone, an anticoagulant. For domestic animals or pets that have ingested this product, or have obvious poisoning symptoms (bleeding) or lowered prothrombin times, give Vitamin K, by intramuscular or oral administration. Check prothrombin time every 3 days or until values return to normal.	

EPA Reg. No. 270-371
EPA Est. No. 70062-HUN-001 or 081367-IL-001

Net Contents:

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER/PELIGRO



POISON

Fatal if swallowed. Fatal if absorbed through skin. May be fatal if inhaled. Causes moderate eye irritation. Do not get on skin, in eyes, or on clothing. Do not breathe spray mist. Avoid exposure to this product during pregnancy.

Repeated exposures to small amounts of this product can produce accumulative toxicity. Persons at risk should have their prothrombin times checked periodically.

Personal Protective Equipment (PPE) required for this product:

Persons handling this product must use a closed system designed to provide complete dermal and inhalation protection. The system must be capable of removing the pesticide from the original container and transferring it into mixing tanks and/or other equipment used to produce the bait formulations. At any disconnect point, the system must be equipped with a dry disconnect or dry couple shutoff device that is warranted by the manufacturer to minimize drippage to not more than 2 milliliters per disconnect point.

Persons handling this product while using the closed systems must wear:

- Long-sleeve shirt and long pants,
- Shoes plus socks,
- Chemical-resistant gloves made out of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, polyvinyl chloride ≥ 14 mils, or viton ≥ 14 mils
- Chemical-resistant apron, and
- Face-sealing goggles

In case of an emergency spill, a breakdown in the closed system, or other situation where this opened product is not enclosed in a closed system, persons handling or in the immediate area of this product must wear:

- Coveralls worn over short-sleeve shirt or short pants,
- Chemical-resistant apron,
- Socks plus chemical-resistant shoe coverings or chemical-resistant footwear,
- Chemical-resistant gloves made out of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, polyvinyl chloride ≥ 14 mils, or viton ≥ 14 mils
- NIOSH-approved powered air-purifying respirator (PAPR) equipped with an organic-vapor-removing cartridge and a dust/mist prefilter
- If PAPR is not available, than a NIOSH-approved respirator with an organic vapor (OV) cartridge or canister with any R, P, or HE prefilter (if oil not present, an additional prefilter type, N, can be used).
- Face-sealing goggles if PAPR is not used.

Note: Fit test respirator prior to use.

User Safety Requirements

Follow manufacturer's instruction for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Wash thoroughly with soap and water after handling. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This product is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Directions: A rodenticide only for formulation into other registered products for use in and around structures and inside transport vehicles to kill Norway rats, roof rats, and house mice

Products formulated from this technical material will require registration with the U.S. Environmental Protection Agency (EPA).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE: Store in original container in a cool, dry place inaccessible to children and pets.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE

Farnam Companies, Inc. warrants that this product in its unopened package conforms to the chemical description on the label and is reasonably fit for the purposes set forth on the label when used according to directions under normal use conditions to the drops specified. There are no other warranties, expressed or implied, concerning the use of this product other than indicated on the label. This warranty does not extend to the handling or use of this product contrary to label instructions or under abnormal conditions or conditions not reasonably foreseeable to seller, and buyer assumes all risk of any such use.

Manufactured for:
Farnam Companies, Inc.
1501 East Woodfield Road 200W
Schaumburg, IL 60173