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56176-1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 27 1992

Ms. Linda Watson  
Pesticide Regulatory Services  
3703 Sedgefield Drive  
Valdosta, GA 31602

S424362 301  
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Dear Ms. Watson:

Subject: Nu Bro Rat-A-Tac Rat Bait  
EPA Registration No. 56176-1  
Your Submission Dated August 18, 1992

The labels submitted with your "8-months" response to the Reregistration Eligibility Document for Warfarin have been reviewed and are generally acceptable. Because you had previously applied for an amendment to revise the labeling and now need to print labels, we are stamping these labels subject to the modifications required below.

1. On the label for the outer package:
  - a. delete second sentence ("Treated baits . . . wildlife.") from "USE RESTRICTIONS";
  - b. change the first sentence of the "APPLICATION DIRECTIONS" for "RATS" to read  

"Apply 1 to 4 4-OZ. packs of bait per placement.";
  - c. in last sentence of "APPLICATION DIRECTIONS" for "RATS," change "1-3 rats" to "1-2 rats";
  - d. change the first sentence of the "APPLICATION DIRECTIONS" for "MICE" to read  

"Open pack and apply 1/4 to 1/2 ounces of (1-2 level tablespoons) of bait at 8- to 12-foot intervals.";

and
  - e. place all statements of contents together. If this container holds, as the proposed label suggests, six lots of 20 4-oz placepacks apiece, each lot of 20

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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packs also should bear an accepted label. The contents statement for the 20-pack container should read something like

"Contains 20 4-OZ. placepacks. Net Weight: 5 LBS. of bait".

The contents statement on the container of six 20-packs should read something like

"Contains six packages of 20 4-OZ. placepacks each. Net Weight: 30 LBS. of bait".

- f. We prefer that the DIRECTIONS FOR USE statements begin at the top of the left panel. In such an arrangement, the PRECAUTIONARY STATEMENTS and STORAGE AND DISPOSAL STATEMENTS should follow the APPLICATION DIRECTIONS as you have done on the placepack label.
2. On the label for the 4-oz placepack:
    - a. delete second sentence ("Treated baits . . . wildlife.") from "USE RESTRICTIONS";
    - b. change the first sentence of the "APPLICATION DIRECTIONS" for "RATS" to read

"Apply 1 to 4 4-OZ. packs of bait per placement.";
    - c. in last sentence of "APPLICATION DIRECTIONS" for "RATS," change "1-3 rats" to "1-2 rats";
    - d. change the first sentence of the "APPLICATION DIRECTIONS" for "MICE" to read

"Open pack and apply 1/4 to 1/2 ounces of (1-2 level tablespoons) of bait at 8- to 12-foot intervals."; and
    - e. Delete first period (".") in second sentence of item "2." under "IMPORTANT." This sentence ends with "and obtaining bait." rather than "reaching into bait." Some of the problem seems to be due to the fact that the sentence is split between the front and the back panels. We feel that it would be better to place the entire "DIRECTIONS FOR USE" on the back panel and to move "PRECAUTIONARY STATEMENTS," "ENVIRONMENTAL HAZARDS," and (if necessary) "STORAGE AND DISPOSAL" to the front panel than to split the "DIRECTIONS FOR USE" between the front and back panels.
    - f. The "KEEP OUT OF REACH OF CHILDREN" statement must precede the signal word ("CAUTION") on the front

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panel.

Note that this product must be packaged in 4-oz placepacks. Its "DIRECTIONS FOR USE" would be incorrect for other sizes of placepacks and inappropriate for bait not contained in placepacks.

When you print labels, note that the subheading "IMPORTANT" should be at least equal in prominence with "USE RESTRICTIONS," "SELECTION OF TREATMENT AREAS," and "APPLICATION DIRECTIONS." The subheadings "RATS," "MICE," and "RATS/MICE" should be equal in prominence to one another and should be less prominent than "APPLICATION DIRECTIONS." When labels are printed, preserve paragraph distinctions. Do not run the numbered items under "IMPORTANT" together in one paragraph. The type used for "KILL RATS & MICE WITH" must be significantly smaller than that used for "NU-BRO RAT-A-TAC RAT BAIT" so that it is clear that "NU-BRO RAT-A-TAC RAT BAIT" is the name of the product.

The efficacy studies cited for this product remain acceptable. These bait acceptance studies have the MRID numbers 402125-01 (mice) and 402125-02 (rats).

The placepack-penetration study submitted for rats (MRID number 423989-01) also is acceptable.

A stamped copy of the label is enclosed for your records.

Submit one copy of the finished labeling before releasing the product for shipment.

Sincerely yours,

Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)

**STORAGE AND DISPOSAL**

**STORAGE:** Store only in original container, in a dry place inaccessible to children and pets.  
**DISPOSAL:** Do not reuse empty container. Securely wrap in newspaper and discard in trash.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION**

Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding.

**NOTE TO PHYSICIAN:** If ingested, administer Vitamin K, intra-muscularly or orally, as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

**ENVIRONMENTAL HAZARDS**

This product is toxic to mammals and birds. Do not apply this product to water, swamps, bogs, or pot-holes.

**DIRECTIONS FOR USE**

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

**READ THIS LABEL:** Read this entire label and follow all use directions and use precautions.

**IMPORTANT:** Do not expose children, pets, or other nontarget animals to rodenticides. To help to prevent accidents:

1. Store product not in use in a location out of reach of children, and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and nontarget wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hooved livestock, raccoons, bears, other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

**KILL RATS & MICE WITH  
NU-BRO RAT-A-TAC RAT BAIT**

Kills Norway Rats, Roof Rats, and House Mice

**ACTIVE INGREDIENT:**

Warfarin (3-(alpha-Acetylbenzyl)-4-hydroxycoumarin).....	0.025%
INERT INGREDIENTS.....	99.975%
TOTAL.....	100.000%

**CAUTION**

**KEEP OUT OF REACH OF CHILDREN  
SEE LEFT PANEL FOR ADDITIONAL  
PRECAUTIONARY STATEMENTS**

Contains:

6 X 20 X 4 OZ.

EPA Reg. No. 56176-1 EPA Est. No. 56176-IA 001

Manufactured By:

**E-2 PRODUCTS COMPANY**  
P. O. Box 169  
Manson, IA 50563

NET WEIGHT: 30 LBS.

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated:**

**AUG 27 1992**

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

56176-1

**USE RESTRICTIONS -**  
Roof rats and House  
industrial and agri  
ilar man-made struc  
be placed in tamper  
not accessible to c  
imals or wildlife.  
where there is a po  
food or surfaces th  
with food.

**SELECTION OF TREATM**  
where rats and/or mi  
and consume the bait  
are along walls, by  
side burrows, in cor  
between floors and v  
rodents or their sig  
Protect bait from sn  
possible.

**APPLICATION**  
**RATS:** Apply 4 to 16  
ment. Maintain an u  
bait for at least 10  
tains enough bait to  
**MICE:** Apply 1/4 to 1  
spoons) of bait at 8  
placements (up to 2  
points of very high  
uninterrupted supply  
15 days.

**RATS & MICE:** Replace  
immediately. Collec  
animals and unconsum  
reinfestation, elimin  
age as much as possi  
occur, repeat treatm  
source of infestatio  
permanent bait stati  
needed.

Buyer assumes all r  
this material when  
trary to label inst.

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FRONT PANEL

KILL RATS & MICE WITH

NU-ERO RAT A-TAC RAT BAIT

Kills Norway Rats, Roof Rats, and House Mice

ACTIVE INGREDIENT:

Warfarin (3-[alpha-Acetylbenzyl]-  
4-hydroxycoumarin)..... 0.025%  
INERT INGREDIENTS:..... 99.975%  
TOTAL.....100.000%

DIRECTIONS FOR USE

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

READ THIS LABEL: Read this entire label and follow all  
use directions and use precautions.

IMPORTANT: Do not expose children, pets, or other non-  
target animals to rodenticides. To help to prevent  
accidents:

1. Store product not in use in a location out of reach  
of children, and pets.

2. Apply bait in locations out of reach of children,  
pets, domestic animals and nontarget wildlife, or in  
tamper-resistant bait stations. These stations must  
be resistant to destruction by dogs and by children  
under six years of age, and must be used in a manner  
that prevents such children from reaching into bait.

See back panel for remainder of DIRECTIONS FOR USE and  
precautionary and disposa' statements.

CAUTION

KEEP OUT OF REACH OF CHILDREN

SEE BACK PANEL FOR ADDITIONAL  
PRECAUTIONARY STATEMENTS

EPA Reg. No. 56176-1  
EPA Est. No. 56176-IA 001

NET CONTENTS: 4OZ.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

AUG 27 1992

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

56176-1

MANUFACTURED BY: E-Z-PRODUCTS COMPANY  
P. O. Box 169  
Manson, Iowa 50563

mals or wildlife. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food.

**SELECTION OF TREATMENT AREAS-** Determine areas where rats and/or mice will most likely find and consume the bait. Generally, these areas are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been observed. Protect bait from snow. Remove as much food as possible.

#### APPLICATION DIRECTIONS

**RATS:** Apply 1 to 4 packs of bait per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days. One 4-oz. pack contains enough bait to control 1-3 rats.

**MICE:** Apply 1/4 to 1/2 ounces (1-2 level table-spoons) of bait at 8 to 12 foot intervals. Larger placements (up to 2 ounces) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days.

**RATS & MICE:** Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and unconsumed bait properly. To prevent reinfestation, eliminate food, water, and harbor-age as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish bait as needed.

#### STORAGE AND DISPOSAL

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

**DISPOSAL:** Do not reuse empty container. Securely wrap in newspaper and discard in trash.

#### PRECAUTIONARY STATEMENTS

##### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding.

**NOTE TO PHYSICIAN:** If ingested, administer Vitamin K, intra-muscularly or orally, as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

##### ENVIRONMENTAL HAZARDS

This product is toxic to mammals and birds. Do not apply this product to water, swamps, bogs, or potholes.

**NOTICE:** Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.