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FEB 28 1996

R.E. Broyles  
Purina Mills, Inc.  
P.O. Box 66812  
St. Louis, MO 63166-6812

Dear Mr. Broyles:

Subject: Purina Assault Rat Place Pack  
EPA Registration No. 602-316  
Amendment dated 2/1/96

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes to your label:

Comments for 1.5-oz placepack label

1. Delete the claim paragraph from the FRONT PANEL or modify it to read as shown below.

"Rats consume a lethal dose in a single feeding and usually die from 1 to 3 days after they eat the bait. Rats cease feeding after consuming a single dose in a single-night's feeding. ASSAULT Rat Place Pack is effective against anticoagulant-resistant rats."

If these placepacks are not to be sold individually, it should not be necessary to have this claim on the placepack's label.

If the packs are to be sold individually, the label would have to bear a qualifying statement to the effect that one pack could reasonably be expected to kill only limited numbers of rats. Since one rat could remove and cache an entire pack, the minimum number that one pack could be expected to kill would be one rat. We have determined that the highest number that one pack could be expected to kill would be 4. This figure comes from consideration of the ways in which the contents of one pack might become available to rats and the amounts of bait

B Edwards 11602-316-4

2/28/96

consumed per rat or that were in packs that were opened by rats per animal killed in some of your laboratory trials. An acceptable qualifying statement for a single 1.5-oz pack of this product would be as follows:

"The amount of bait in this placepack may not be sufficient to kill more than one to four rats."

This statement must appear either on the front of the panel below the name of the product or at the beginning of the "APPLICATION DIRECTIONS" portion of the "DIRECTIONS FOR USE."

2. Make sure that the claim "CONTAINS BITREX" appears in print that is smaller and less conspicuous than that used for "KEEP OUT OF REACH OF CHILDREN", "CAUTION", and "SEE OTHER CAUTIONS BELOW." (Since no other cautions actually follow "SEE OTHER CAUTIONS BELOW" on the front panel of this label, replace "BELOW" with text such as "ON BACK PANEL" which more accurately indicates where such cautions would be found.)

3. Correct the spelling error of "Determine" in the first sentence of the "SELECTION OF TREATMENT AREAS:" portion of the "DIRECTIONS FOR USE."

4. Change "one or two" to "one to three" (or "1-3", or "1 to 3") in the second sentence of the first paragraph of the "APPLICATION DIRECTIONS" portion of the "DIRECTIONS FOR USE."

When you print placepack labels, preserve the organizational framework which appears on your proposed revised label and make sure that the layout of the label does not result in any required text being obscured. Do not divide the "DIRECTIONS FOR USE" between label panels. Note that it might be possible to place all of the required precautionary text on the front panel of the label. As it is important to limit their potential conspicuousness and attractiveness to children, labels for placepacks should not be brightly colored.

Comments for Pail Containing 25 1.5-oz placepacks'

1. Delete the claim paragraph from the front panel or modify it to read as shown below.

"Rats consume a lethal dose in a single feeding and usually die from 1 to 3 days after they eat the bait. Rats cease feeding after consuming a single dose in a single-night's feeding. ASSAULT Rat Place Pack is effective against anticoagulant-resistant rats."

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

2. Make sure that the claim **"CONTAINS BITREX"** appears in print that is smaller and less conspicuous than that used for **"KEEP OUT OF REACH OF CHILDREN"**, **"CAUTION"**, and **"SEE OTHER CAUTIONS BELOW."** (Since no other cautions actually follow **"SEE OTHER CAUTIONS BELOW"** on the front panel of this label, replace **"BELOW"** with text such as **"ON BACK PANEL"** which more accurately indicates where such cautions would be found.)

3. Change **"one or two"** to **"one to three"** (or **"1-3"**, or **"1 to 3"**) in the second sentence of the first paragraph of the **"APPLICATION DIRECTIONS"** portion of the **"DIRECTIONS FOR USE."**

When you print placepack labels, preserve the organizational framework which appears on your proposed revised label and make sure that the layout of the label does not result in any required text being obscured. Do not divide the **"DIRECTIONS FOR USE"** between label panels.

Comments for Display Carton Pertaining to 25 1.5-oz placepacks

1. Delete the claim paragraph from the front panel or modify it to read as shown below.

"Rats consume a lethal dose in a single feeding and usually die from 1 to 3 days after they eat the bait. Rats cease feeding after consuming a single dose in a single-night's feeding. ASSAULT Rat Place Pack is effective against anticoagulant-resistant rats."

2. Make sure that the claim **"CONTAINS BITREX"** appears in print that is smaller and less conspicuous than that used for **"KEEP OUT OF REACH OF CHILDREN"**, **"CAUTION"**, and **"SEE OTHER CAUTIONS BELOW."** (Since no other cautions actually follow **"SEE OTHER CAUTIONS BELOW"** on the front panel of this label, replace **"BELOW"** with text such as **"ON BACK PANEL"** which more accurately indicates where such cautions would be found.)

3. Change **"one or two"** to **"one to three"** (or **"1-3"**, or **"1 to 3"**) in the second sentence of the first paragraph of the **"APPLICATION DIRECTIONS"** portion of the **"DIRECTIONS FOR USE."**

When you print placepack labels, preserve the organizational framework which appears on your proposed revised label and make sure that the layout of the label does not result in any required text being obscured. Do not divide the **"DIRECTIONS FOR USE"** between label panels. Note that it might be possible to place all of the required precautionary text on the front panel of the label.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

-4-

If this carton is to be used as a dispenser from which individual placepacks are to be sold, all placepacks packed into such a carton must bear an appropriate qualifying statement concerning the numbers of rats that one could expect to kill with the contents of a single pack. See discussion of this issue under item #1 above for the placepack label.

Submit one copy of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records. If you have any questions about this letter, please contact Beth Edwards at (703) 305-5400 or (703) 305-6600.

Sincerely yours,

Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure		CONCURRENCES					
SYMBOL							
SURNAME							
DATE							

5 of 13

Reason For Issue. Update per PR notice 94-7.

Date Issued: 2/1/96 (White)

Prev. Date Issued: 6/8/95

UPC CODE: 01929801204

FRONT PANEL

(9-Square Logo ® )

EPA Reg. No. 602-316

PURINA ®  
BRAND

ASSAULT™ RAT

PLACE PACK ®

CONTAINS  
BITREX

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 28 1996

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, this product has  
registered under EPA Reg. No.

602-316

Rat Poison  
For Indoor and Outdoor  
Rodent Control

Kills Roof Rats and Norway Rats

Rodents consume a lethal dose in a single feeding with dead rodents appearing one or two days after they eat the bait. Rodents cease feeding after consuming a lethal dose in a single-night's feeding. ASSAULT Rat Place Pack is effective against anticoagulant-resistant rats.

ACTIVE INGREDIENT:

bromethalin: N methyl-2,4-dinitro-N-(2,4,6-tribromophenyl) -  
6-(trifluoromethyl) benzenamine . . . . . 0.01%

INERT INGREDIENTS . . . . . 99.99%  
100.00%

KEEP OUT OF REACH OF CHILDREN  
CAUTION  
SEE OTHER CAUTIONS BELOW

NET WT 1.5 OZ

D-0131

Manufactured For  
PURINA MILLS, INC.  
P O Box 66812  
St. Louis, Missouri 63166-6812 U.S.A.

PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS & DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. May be harmful or fatal if swallowed. Avoid contact with skin, eyes or clothing. In case of accidental contact, flush eyes or skin with water and wash contaminated clothing. Seek medical attention immediately if ingested or if breathing difficulty occurs or irritation persists. Wash hands thoroughly after handling Assault Rat Place Pack.

NOTE TO PHYSICIAN

Assault Rat Place Pack is not an anticoagulant type of rodenticide. If ingested, limit absorption by either emesis or gastric lavage. Sublethal symptoms, if present, would be the result of cerebral edema and should be treated accordingly through administration of an osmotic diuretic and corticosteroid.

ENVIRONMENTAL HAZARDS

This product is toxic to mammals and birds. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

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 stations are needed in areas open to hoofed livestock, raccoons, bears, or 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.

**USE RESTRICTIONS:** For control of Norway rats and roof rats in and around homes, industrial and agricultural buildings, and similar man-made structures. This product may also be used in alleys located in urban areas, inside transport vehicles (ships, trains, aircraft), and in and around related port or terminal buildings. Do not use Assault Rat Place Pack in sewers. Do not place baits in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast placepacks or bait.

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

**APPLICATION DIRECTIONS:** Assault Rat Place Pack does not contain an anticoagulant rodenticide. Generally rats will consume a lethal dose in a single feeding with death occurring one or two days later.

Apply 1 to 4 place packs per placement. Adjust the number of packs applied to the level of rat feeding expected at each placement location. Placements should be spaced at 20 to 30 foot intervals.

Highest bait consumption is expected to occur on the first day or two after treatment. After several days, inspect the placements and replenish bait at sites where there is evidence of heavy feeding. Although one night's feeding will usually provide a lethal dose, maintain bait for at least a week to provide all rats a chance to feed on the bait. Baiting should be continued until all signs of feeding have ceased. Collect and properly dispose of all dead rodents and leftover bait. Where a continuous source of infestation is present, establish permanent bait stations and replenish bait as needed.

#### STORAGE AND DISPOSAL

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

**STORAGE:** Store in a cool, dry place away from other chemicals. Keep containers closed.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Do not reuse empty containers. Then dispose of liner in a sanitary landfill or by incineration if allowed by state or local authorities. If burned, stay out of smoke.

EPA Est. 67517-MO-1

9601 L

Printed in U S A

Reason For Issue: Update per PR Notice 94-7

Date Issued: 2/1/96 (White)

Prev. Date Issued: 6/8/95

UPC CODE: 01929801296

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FRONT PANEL

(9-Square Logo <sup>®</sup>)

EPA Reg. No. 602-316

Pail Copy

PURINA <sup>®</sup>

ASSAULT<sup>™</sup> RAT

PLACE PACK <sup>®</sup>  
BRAND

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 28 1996

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, this product is  
registered under EPA Reg. No.

602-316

CONTAINS  
BITREX

Rat Poison  
For Indoor and Outdoor  
Rodent Control

Kills Roof Rats and Norway Rats

Rodents consume a lethal dose in a single feeding with dead rodents appearing one or two days after they eat the bait. Rodents cease feeding after consuming a lethal dose in a single-night's feeding. ASSAULT Rat Place Pack is effective against anticoagulant-resistant rats.

ACTIVE INGREDIENT

bromethalin: N-methyl-2,4-dinitro-N-(2,4,6-tribromophenyl) -

6-(trifluoromethyl) benzenamine . . . . . 0.01%

INERT INGREDIENTS . . . . . 99.99%

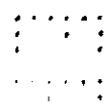
100.00%

KEEP OUT OF REACH OF CHILDREN  
CAUTION  
SEE OTHER CAUTIONS ON SIDE PANEL

NET WT 25 - 1.5 OZ PACKETS

D-0133

Manufactured For  
PURINA MILLS, INC.  
P.O. Box 66812  
St. Louis, Missouri 63166-6812 U.S.A.



PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS & DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. May be harmful or fatal if swallowed. Avoid contact with skin, eyes or clothing. In case of accidental contact, flush eyes or skin with water and wash contaminated clothing. Seek medical attention immediately if ingested or if breathing difficulty occurs or irritation persists. Wash hands thoroughly after handling Assault Rat Place Pack.

NOTE TO PHYSICIAN:

Assault Rat Place Pack is not an anticoagulant type of rodenticide. If ingested, limit absorption by either emesis or gastric lavage. Sublethal symptoms, if present, would be the result of cerebral edema and should be treated accordingly through administration of an osmotic diuretic and corticosteroid.

ENVIRONMENTAL HAZARDS

This product is toxic to mammals and birds. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

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 stations are needed in areas open to hoofed livestock, raccoons, bears, or 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.

**USE RESTRICTIONS** For control of Norway rats and roof rats in and around homes, industrial and agricultural buildings, and similar man-made structures. This product may also be used in alleys located in urban areas, inside transport vehicles (ships, trains, aircraft), and in and around related port or terminal buildings. Do not use Assault Rat Place Pack in sewers. Do not place baits in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast placepacks or bait.

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

**APPLICATION DIRECTIONS.** Assault Rat Place Pack does not contain an anticoagulant rodenticide. Generally rats will consume a lethal dose in a single feeding with death occurring one or two days later.

Apply 1 to 4 place packs per placement. Adjust the number of packs applied to the level of rat feeding expected at each placement location. Placements should be spaced at 20 to 30 foot intervals.

Highest bait consumption is expected to occur on the first day or two after treatment. After several days, inspect the placements and replenish bait at sites where there is evidence of heavy feeding. Although one night's feeding will usually provide a lethal dose, maintain bait for at least a week to provide all rats a chance to feed on the bait. Baiting should be continued until all signs of feeding have ceased. Collect and properly dispose of all dead rodents and leftover bait. Where a continuous source of infestation is present, establish permanent bait stations and replenish bait as needed.

**STORAGE AND DISPOSAL**

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

**STORAGE:** Store in a cool, dry place away from other chemicals. Keep containers closed.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

EPA Est. 67517-MO-1

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Reason For Issue: Update per PR Notice 94-7

Date Issued: 2/1/96 (White)

Prev. Date Issued: 6/8/95

UPC CODE: 01929801299

FRONT PANEL

(9-Square Logo ® )

EPA Reg. No. 602-316

Display Carton Copy

ACCEPTED  
with COMMENTS  
in EPA Label Data

FEB 28 1996

**CONTAINS  
BITREX**

PURINA ®  
ASSAULT™ RAT  
PLACE PACK ®  
BRAND

Under the Product  
Fungicide, etc.  
as provided, etc.  
registered under EPA Reg. No.  
602-316

Rat Poison  
For Indoor and Outdoor  
Rodent Control

Kills Roof Rats and Norway Rats

Rodents consume a lethal dose in a single feeding with dead rodents appearing one or two days after they eat the bait. Rodents cease feeding after consuming a lethal dose in a single-night's feeding. ASSAULT Rat Place Pack is effective against anticoagulant-resistant rats.

ACTIVE INGREDIENT

bromethalin N methyl-2,4-dinitro-N-(2,4,6-tribromophenyl) -  
6-(trifluoromethyl) benzenamine

0.01%

INERT INGREDIENTS

99.99%

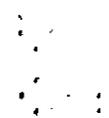
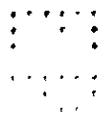
100.00%

KEEP OUT OF REACH OF CHILDREN  
CAUTION  
SEE OTHER CAUTIONS ON SIDE PANEL

NET WT 25 - 1.5 OZ PACKETS

D-0135

Manufactured For  
PURINA MILLS, INC  
P.O. Box 66812  
St. Louis, Missouri 63166-6812 U.S.A.



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PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS & DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. May be harmful or fatal if swallowed. Avoid contact with skin, eyes or clothing. In case of accidental contact, flush eyes or skin with water and wash contaminated clothing. Seek medical attention immediately if ingested or if breathing difficulty occurs or irritation persists. Wash hands thoroughly after handling Assault Rat Place Pack

NOTE TO PHYSICIAN:

Assault Rat Place Pack is not an anticoagulant type of rodenticide. If ingested, limit absorption by either emesis or gastric lavage. Sublethal symptoms, if present, would be the result of cerebral edema and should be treated accordingly through administration of an osmotic diuretic and corticosteroid.

ENVIRONMENTAL HAZARDS

This product is toxic to mammals and birds. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

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 stations are needed in areas open to hooved livestock, raccoons, bears, or 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.

**USE RESTRICTIONS** For control of Norway rats and roof rats in and around homes, industrial and agricultural buildings, and similar man-made structures. This product may also be used in alleys located in urban areas, inside transport vehicles (ships, trains, aircraft), and in and around related port or terminal buildings. Do not use Assault Rat Place Pack in sewers. Do not place baits in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast placepacks or bait.

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**APPLICATION DIRECTIONS:** Assault Rat Place Pack does not contain an anticoagulant rodenticide. Generally rats will consume a lethal dose in a single feeding with death occurring one or two days later.

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Highest bait consumption is expected to occur on the first day or two after treatment. After several days, inspect the placements and replenish bait at sites where there is evidence of heavy feeding. Although one night's feeding will usually provide a lethal dose, maintain bait for at least a week to provide all rats a chance to feed on the bait. Baiting should be continued until all signs of feeding have ceased. Collect and properly dispose of all dead rodents and leftover bait. Where a continuous source of infestation is present, establish permanent bait stations and replenish bait as needed.

#### STORAGE AND DISPOSAL

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

**STORAGE** Store in a cool, dry place away from other chemicals. Keep containers closed.

**PESTICIDE DISPOSAL** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL** Do not reuse empty containers. Then dispose of liner in a sanitary landfill or by incineration if allowed by state or local authorities. If burned, stay out of smoke.

EPA Est. 67517-MO-1

9601 J

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**BEST AVAILABLE COPY**