

SEP 14 1993

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Ms. Judith A Thompson
Haco, inc.
P. O. Box 7190
Madison, WI 53707

Dear Ms. Thompson:

Subject: Zinc Phosphide Bait
EPA Registration No.: 2393-185
Zinc Phosphide Pellets
EPA Registration No.: 2393-521
Zinc Phosphide Rodent Pellets
EPA Registration No.: 2393-522
Your Letters Dated September 1. 1993

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

However, you are still required to provide us with your plan for the correction of product labeling in channels of trade as requested in our letter of July 26, 1993 as well as your plans for any existing inventory. You must also address the requirement for informing your distributors and retailers of the change in the emergency treatment statement. The present requirement is that you supply an "informational bulletin" to your distributors to be provided to all retailers who may still have your product on their shelves. We are concerned that anyone purchasing a Zinc Phosphide product be aware that the emergency treatment statement has been changed.

You must supply a copy of an informational bulletin that you will send immediately to all distributors that you have provided your product within the past year. We have enclosed an example of the bulletin used by the Zinc Phosphide Consortium, which you may use; if so, please let us know that you will be using it. Also, you must provide a list of your distributors, all of whom must be sent the bulletin.

Sincerely yours,

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

ORCHARDS & GROVES (Con't)
 During hand broadcast operations, three tablespoon amounts into heavy cover using tree roots, rock overcrops, and fence lines. Bait should be applied at the rate of 8 to 10 pounds per acre.

RANGELAND

USE RESTRICTIONS: For the control of Columbian (*Spermophilus columbianus*) and Richardson's (*S. richardsoni*) ground squirrels, blacktailed (*Cynomys ludovicianus*), whitetailed (*C. rutilus*), and Gunnison (*C. gunnisoni*) prairie dogs in Western United States, Arizona, Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, Utah, and Wyoming.

PRE-BAITING: To increase acceptance of treated bait by prairie dogs and ground squirrels, prebait with one teaspoon of cracked corn per mound, one or two days prior to using toxic bait.

BAITING: After all or most of the prebait has been eaten, apply bait only to areas where prebait was consumed. Establish observation period during prebaiting. Apply bait by hand as a six-inch bait spot on edge of each mound or in adjacent feeding area. Apply at the rate of one teaspoon per bait spot during late summer or fall period (July-December). Do not apply more than once during this period. Dispose of spoiled or uneaten bait by burial.

SUGARCANE

USE RESTRICTIONS: For control of Polynesian (*Rattus exulans*), Norway (*R. norvegicus*), Rice (*Oryzomys palustris*), Florida water (*Neotoma albigula*), cotton (*Sigmodon hispidus*), and Roof rats (*R. rattus*) in sugarcane fields. Do not apply within 30 days of harvest. Do not apply to adjacent noncrop areas. For a 36-month crop period, the total number of bait applications must not exceed four, and the total bait applied shall not exceed 20 pounds per acre.

PRE-BAITING: To increase acceptance of treated bait by rats, prebait with three pounds cracked corn per acre one or two weeks prior to using toxic bait.

BAITING: Apply five pounds of bait per acre broadcast. Apply broadcast by aircraft, ground driven devices or by hand (wear rubber gloves during hand broadcast operations).

GOPHERS

USE RESTRICTIONS: For control of the Plains pocket gophers (*Geomys bursarius*), Southeastern pocket gophers (*G. sinuatus*), yellow faced pocket gophers (*Pappogomys castaneus*), and *Thomomys* spp. pocket gophers in lawns, golf courses, and other noncrop areas.

GOPHERS (Con't)

HAND BAITING: Place one teaspoon (4 grams) of bait at 2-4 foot intervals using a mechanical probe or similar device into the underground runway. After bait is dropped into the probe, use cover the hole. Pick up and bury all spilled bait.

BURROW BUILDER: Drop teaspoonful quantity of bait at 4-5 foot intervals in the artificial burrow made by the machine. Apply at a rate of 2-3 pounds per acre. Pick up and bury all spilled bait.

KANGAROO RATS

USE RESTRICTIONS: For control of Ord's kangaroo rats (*Dipodomys ordi*), banner tailed kangaroo rats (*Dipodomys spectabilis*), and Merriam's kangaroo rats (*Dipodomys merriami*) in rangeland vegetation and noncrop areas.

HAND BAITING: Place one tablespoon (12 grams) of bait at 2 foot intervals on opposite sides of mounds. Attempt to place bait in feeding runs near the entrance to burrows.

NONCROP RIGHTS-OF-WAY

USE RESTRICTIONS: For control of California ground squirrels (*Spermophilus beecheyi*) on noncrop rights of way next to canal and ditch banks and other noncrop borders during late spring and summer. Do not apply on roads, near residential areas, over water, or where plants are grown for food or feed. Consult local, state and federal game authorities before use to insure this product is used in accordance with regulations.

PRE-BAITING: To increase acceptance of treated bait by squirrels, prebait with six pounds of cracked corn per acre along rights of way 2-3 days prior to using toxic bait.

BAITING: Broadcast bait in a 10-15 foot swath along rights of way using hand or ground driven dispensing devices. Do not exceed six pounds per acre. Do not treat more than once during treatment period. When applying next to canals, apply only to the canal right of way between the base of the levee and adjacent properties. Do not treat the canal and levee. Dispose of excess bait from application equipment by burial.

HAND BAITING IN NONCROP AREAS

Such as Lawns, Ornamentals, Golf Courses, Parks and Nurseries.
USE RESTRICTIONS: For control of meadow, prairie and pine voles (*Microtus*) to California ground squirrels (*Spermophilus beecheyi*).

HAND BAITING IN NONCROP AREAS (Con't)

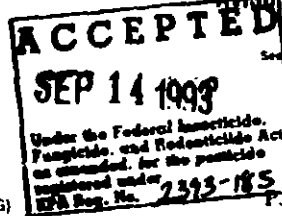
Columbian ground squirrels (*S. columbianus*), thirteen lined ground squirrels (*S. tridecemlineatus*), and Richardson's ground squirrels (*S. richardsoni*). Do not apply on roads, over water or where plants are grown for food or feed.

PRE-BAITING: To increase acceptance of treated bait by squirrels, prebait with one teaspoon of cracked corn around each active burrow 2-3 days prior to using toxic bait.

HAND BAITING: Apply one teaspoon bait around each active burrow or runway. Allow bait to fall through grass to ground surface but do not apply to bare ground. Do not place bait in piles.

NOTICE OF WARRANTY

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of seller. In no case shall the seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the buyer. Seller makes no warranties of merchantability or fitness for a particular purpose, nor any other express or implied warranty except as stated above.



CODE 100123456789 (I/OG)

RESTRICTED USE
 FOR RETAIL SALE TO AND USE BY APPLICATORS OR PERSONS UNDER SUPERVISION AND ONLY FOR THE CERTIFIED APPLICATION.

Hopk
ZINC PHOSPHIDE

For spot treatment around burrows, sugarcane fields and on rangeland, broadcasting by ground spreader, cane fields and/or noncrop areas, spreader in vineyards.

ACTIVE INGREDIENT
 Zinc Phosphide
INERT INGREDIENTS

EPA Reg. No. 2393-185

KEEP OUT OF REACH OF CHILDREN

WARNING
 PRECAUTION: All persons should avoid contact with this product. Do not breathe dust or fumes. Do not get on clothing. Do not get in eyes. See inside for additional precautions and directions.

Man
HA
 P.O. Box 7190, M
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STATEMENT OF PRACTICAL TREATMENT

Any person applying zinc phosphide products and experiencing signs and symptoms such as nausea, abdominal pain, weakness in the chest or weakness should be seen by a physician immediately.
If SWALLOWED: Immediately call a Poison Control Center or physician to transport the patient to the nearest hospital. Do not drink water. Do not administer anything by mouth to ease the patient until advised to do so by a physician.
If EYES: Flush with plenty of water. Get medical attention if irritation persists.
If ON SKIN: Remove contaminated clothing and wash affected area with soap and water.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Keep away from humans, domestic animals and pets. May be fatal or harmful if swallowed. Avoid skin contact. Wear suit... gloves when handling this product. Do not breathe dust.
Avoid contamination of feed or foodstuffs. Avoid contact with acids.
Wash thoroughly with soap and water after handling and before eating or smoking.

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and fish. Birds and other wildlife feeding on treated bait may be killed.

Do not apply to open ground, roads and areas in which no vegetation occurs. Pick up and properly dispose of all spilled toxic bait. Keep out of lakes, streams, ponds and all aquatic systems. Do not apply where runoff from this product will enter an aquatic system. Check for and dispose of excess or spoiled bait and carcasses daily until the bait is expended or removed.

ENDANGERED SPECIES CONSIDERATIONS

Whooping Crane (*Grus americana*)
Do not use this product 30 days prior to arrival and 10 days after the whooping crane leaves known crane habitat.
Attleater's greater prairie chicken (*Tympanuchus cupido attleateri*)
Do not use this product in the presently occupied range of the Attleater's greater prairie chicken in the following Texas counties: Arkansas, Austin, Brazoria, Colorado, DeWitt, Fort Bend, Galveston, Goliad, Harris, Reagan, Victoria, Waller, and Wharton.

ENDANGERED SPECIES CONSIDERATIONS (Can H)

Yellow shouldered Black bird (*Aegeria alberta*) and Puerto Rican Plain Pigeon (*Columba monita*) are more.

The product must not be used in the following areas except in temperate proof bait boxes (within 10 kilometers of Central America, Lago Cedo, Cabo San German, 15 kilometers of La Esperanza south of Highway 2 from city of Mayaguez to the city of Ponce and all of Mona Island, Puerto Rico).

Utah prairie dog (*Cynomys ludovicianus*)
Do not use this product in the range of the Utah prairie dog (Utah).

Salt marsh harvest mouse (*Reithrodontomys raviventris*)

Do not use this product within 1/2 mile of salt marsh vegetation and/or brackish water wetlands which are located 1/2 mile or adjacent to San Pablo Bay and San Francisco Bay or 2 1/2 miles in the Sacramento River below or adjacent to the confluence of the Sacramento River and the San Joaquin River (California).

Morro Bay Kangaroo Rat (*Dipodomys deserti morroensis*)
Do not use this product within 2 1/2 miles of Baywood Park which is located on Morro Bay (California).

Alaskan Canada goose (*Branta canadensis*)
Do not use this product from October to March in the Federally closed goose hunting areas in the state of California. See current Duck and Goose Hunting game laws for current map.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
STORAGE: Keep dry. Protect from direct contact with water or excessive moisture. Store in a well ventilated area not accessible to children, pets, domestic animals or wildlife. Keep away from heat and open flame. Once opened, do not store bag for prolonged period. In case of puncture, use oversize bag and securely close. PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or residue 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.
CONTAINER DISPOSAL: See Container Label.

REENTRY STATEMENT

Do not enter treated areas without protective clothing until dusts have settled. Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information. Written or oral precautions must be given to workers engaged in agricultural hand labor who are expected to be in a treated area or in an area about to be treated with this product. Written or oral precautions must include the following information: WARNING: area treated with zinc phosphide on (date of application). Do not enter treated area the day of application without protective clothing and gloves. Protective clothing at a minimum should include clean long pants, long sleeved shirt, shoes and socks. For accidental exposure, see Statements of Practical Treatment.
Oral precautions must be given if there is reason to believe that written precautions cannot be understood by workers. When oral precautions are given, precautions shall be given in a language customarily understood by workers.

LIMITATIONS

The Following Limitations apply to Agricultural Areas listed on this label. This bait must not be applied on roads, near residential areas, or over water. Do not broadcast over growing crops other than sugarcane. Apply bait on warm, clear days. Do not graze animals in treated areas.

GRAPE VINEYARDS

USE RESTRICTIONS: For control of meadow, prairie and pine voles (*Microtus* sp.) white footed mice (*Peromyscus* sp.) meadow jumping mice (*Zapus* sp.). Do not make broadcast application of bait over growing crops when the bait may lodge on the plant. Do not apply to bare ground.

BROADCAST BAITING: Broadcast bait evenly on the ground between the rows by cyclone seeder or by hand (wear rubber gloves during hand broadcast operations). Apply bait at a rate of 6-10 pounds per acre. Do not apply by air.

MACADAMIA NUT ORCHARDS

USE RESTRICTIONS: For control of Roof rats (*Rattus*), Unleavened must be removed from trees and ground prior to shaking, harvest or mechanized harvest. Orchards may be treated up to 30 days prior to harvesting. Do not make broadcast application of bait over growing crops when the bait may lodge on the plant. Do not apply to bare ground.

MACADAMIA NUT ORCHARDS (Can H)

BROADCAST BAITING: Broadcast at the rate of five (5) pounds of bait per acre. The number of applications shall not exceed more than five (5) pounds of bait per acre per treatment. The total application shall not exceed 20 pounds of bait per acre per year.

HAND BAITING: Place 1-2 teaspoons of bait at the base of each tree (directly on ground) or in suitable forks in each tree (in bait box only).

NURSERY STOCK—ORNAMENTAL AND NON-BEARING FRUIT TREES

USE RESTRICTIONS: For control of meadow, prairie and pine voles (*Microtus* sp.) in ornamental and non-bearing nursery stock.

BROADCAST BAITING: Under infested nursery stock and/or non-bearing fruit trees broadcast evenly by cyclone seeder or by hand (wear rubber gloves during hand broadcast operations). Concentrate in areas with the heaviest vegetation cover. Do not broadcast on bare ground. Apply at a rate of 6-10 pounds per acre.

HAND BAITING: Near the base of infested stock, place teaspoonful quantities of bait in 2-4 locations: either on surface trails or at the mouth of holes leading to underground burrow systems. Do not allow bait to be exposed on bare ground. Do not disturb the runway system. Bait at a rate of 2-3 pounds per acre of infested stock.

ORCHARDS & GROVES

USE RESTRICTIONS: For control of meadow, prairie and pine voles (*Microtus* sp.) in orchards and groves. This product is to be applied during the dormant season. Apply bait after harvest while the orchard or grove is in a non-bearing phase. Do not apply to bare ground (wear rubber gloves during hand broadcast operations).

SPOT OR TRAIL BAITING: Place 1 teaspoon of bait in surface trails or at the mouth of holes leading to underground burrow systems. Two to four bait spots should be made near the base of each infested tree. Do not disturb the runway system and cover bait by putting overhanging grass back in place. Use 2 to 3 lbs. bait per acre.

BAIT PLACEMENT STATION: Place 25 ounces under at least ten established stations per tree. These stations should be established 2-3 months prior to the baiting period by placing rectangular (at least 15" x 15") asphalt shingles of fiberboard slabs or wood or metal at the tree dripline.

BROADCAST BAITING: This product may be broadcast by aircraft cyclone seeder or by hand. When applying by hand wear rubber

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14 1993
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
it is prohibited for the pesticide
registered under

ACTIVE INGREDIENT:

Zinc Phosphide 2.0%

INERT INGREDIENTS: 98.0%

Total 100.0%

KEEP OUT OF THE REACH OF CHILDREN

WARNING

AVISO PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido explicada ampliamente
TRANSLATION TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you

STATEMENT OF PRACTICAL TREATMENT

Any persons applying zinc phosphide products and experiencing signs and symptoms such as nausea, abdominal pain, tightness in the chest, or weakness, should be seen by a physician immediately.

IF SWALLOWED: Immediately call a Poison Control Center or physician, or transport the patient to the nearest hospital. Do not drink water. Do not administer anything by mouth or make the patient vomit unless advised to do so by a physician.

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Keep dry. Protect from direct contact with water or excessive moisture. Store in a well ventilated area not accessible to children, pets, domestic animals or wildlife. Keep away from heat and open flame. Once opened, do not store bag for prolonged period. In case of puncture, use overslip bag and securely close. **PESTICIDE DISPOSAL:** Pesticide wastes are toxic. 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. **CONTAINER DISPOSAL:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

See attached booklet for additional precautionary statements, re-entry and directions for use.

Do not use this product unless attached booklet has been read.

NOTICE OF WARRANTY

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of seller. In no case shall the seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the buyer. Seller makes no warranties of merchantability or fitness for a particular purpose nor any other express or implied warranty except as stated above.



Manufactured For:

HACO, inc.

P.O. Box 7190, Madison, WI 53707

U.S.A.

E.P.A. Reg. No. 2393-185

E.P.A. Est. No. 61282-WI-1

Code IOG 1 2 3 4 5 6 7 8 9 (VOG)

NET CONTENTS

50 LBS. (22.68 KILOS)