PM 04 2393-390 968/99 5-569014 19 4

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

SEP 28 1999

Subject:

)

Warfarin Technical Rodenticide

EPA Reg. No. 2393-390

Your letter dated August 20, 1999

Dear Ms. Thompson:

The labeling referred to above, submitted in connection with registration with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the comply with the following change and submit one (1) copy to us before you ship your product.

• The respirator statement must be modified by notification to conform to PR-Notice 98-9. The fifth sentence below the precautionary statements must read as follows.

When mixing concentrates or baits, use a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R,P, or HE filter.

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of the label stamped "Accepted with Comments" is enclosed for your records.

Sincerely,

Daniel B. Peacock, Biologist Insecticide-Rodenticide Branch Registration Division (7505C)

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ACCEPTED with COMMENTS In EPA Letter Dated:

SEP 2 8 1999

HOPKINS COV-R-TOX®

Under the Federal Insecticide, Europeide, and Radenticide Act, as arounded, for the pesticide repistered under EPA Reg. No.

ENCAPSULATED WARFARIN - 50% TECHNICAL MANUFACTURING CONCENTRATE

For Formulation Only into Registered Rodenticide Concentrates and/or Registered End-Use Rodenticides to Kill Norway Rats, Roof Rats and House Mice.

ACTIVE INGREDIENT:

Warfarin [3-(alpha-Acetonylbenzyl)-4-hydroxycoumarin]	50.00%
INERT INGREDIENTS:	50.00%
TOTAL	100.00%

EPA Reg. No. 2393-390

EPA Est. No. 61282-WI-1

EEP OUT OF REACH OF CHILDREN DANGER



POISON



STATEMENTS OF PRACTICAL TREATMENT

Get medical attention in all cases of suspected poisoning.

IF SWALLOWED: Call a physician or Poison Control Center immediately. Induce vomiting by giving two glasses of water and touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Flush immediately with plenty of water.

IF ON SKIN: Wash thoroughly with soap and water.

IF INHALED: Remove from exposure. Clear airway and assist respiration if needed.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K_1 intramuscularly or orally, as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times. In severe cases, administer Vitamin K_1 intravenously and administer blood transfusions.

OVEREXPOSURE SYMPTOMS: Symptoms may include back pain, weakness (anemia), proneness to bruising, nose bleed, bleeding gums and bloody vomit or urine. If serious overexposure or ingestion is known to have occurred, do not delay medical attention.

See back panel for additional precautionary statements.

LBS.

COV-R-TOX Draft Label Page 2 of 3 August 18, 1999

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Fatal if swallowed or inhaled. If swallowed by humans, domestic animals, wildlife or pets, this material may reduce the clotting ability of the blood and cause bleeding. Do not get in eyes, on skin or on clothing. Do not breathe dust. When mixing concentrates or baits, use a dust filtering respirator (MSHA/NIOSH approval number prefix TC-21c) and chemical-resistant gloves. Wash thoroughly with soap and water after handling and before eating, smoking or using toilet. Protective goggles (or equivalent) and facility for eye-wash recommended. Wear body-covering clothing changed daily, or more often if contaminated. Launder clothing before reuse. Consult physician about baseline and periodic complete blood count and prothrombin time tests.

Keep away from domestic animals, wildlife or pets. Avoid contamination of feed and foodstuffs.

Exposure during pregnancy should be avoided. Warfarin may cause harm to the fetus, including possible birth defects.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes.

PRODUCT DESCRIPTION

Each particle of the warfarin in this product has been specially coated with a material that reduces detection of the warfarin by the rodents at the time the bait is consumed. The coating may help assure greater acceptance of the bait in cases where rodent awareness of uncoated warfarin is responsible for low bait acceptability.

DIRECTIONS FOR USE

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

Only for formulation into a Rodenticide, for (1) the following uses: control of Norway rats, roof rats, and house mice in and around homes, agricultural and industrial building, and similar man-made structures, and in sewers; (2) uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) uses for experimental purposes that are in compliance with USEPA requirements.

STORAGE AND DISPOSAL

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

Storage: Keep product in tightly closed original container. Store in a dry area not accessible to children, pets, domestic animals or wildlife. Do not store near material with a strong odor.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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: 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.

This product is for manufacturing purposes only. Formulators are responsible for compliance with pesticide registration regulations relating to use of this material.

NOTICE OF WARRANTY: Manufacturer and Seller make no warranty of merchantability, fitness for any purpose or otherwise, express or implied concerning this product or its use, which extends beyond the statements on this label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

COV-R-TOX is a registered TM of HACCO, Inc.

Manufactured For:

HACO, Inc.

P.O. Box 7190, Madison, WI 53707 U.S.A.

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Page 3 of 3 - For Shipping Container
August 18, 1999

TOXIC SOLID, ORGANIC, N.O.S. (WARFARIN), UN 2811

IATA: COUMARIN DERIVATIVE PESTICIDE, SOLID, TOXIC, NOS (WARFARIN), UN 3027, CLASS 6.1 (TOXIC)

TOXIC LABEL, CARGO AIRCRAFT ONLY LABEL

