



PM-14

Reg # 2393-497

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN

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OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

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HACO, Inc.  
P.O. Box 7190  
Madison, Wisconsin 53707

Attention: Judith A. Thompson

Subject: Ramik Brown  
EPA Registration Number 2393-497  
Your amended labeling dated January 18, 1995

Dear Ms. Thompson,

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, and pursuant to PR Notice 94-7, is acceptable provided that you:

1. In the "APPLICATION DIRECTIONS" for "RATS", change "ozs." to "oz."
2. Limit the minimum packaging size for the subject product to not less than 1 lb. (16 oz.). We note that the minimum packaging size that you have indicated for this product on the amendment application form is 4 oz. A 4-oz package and any other package significantly smaller than 1 lb. would require an amendment to add text to the label indicating that the contents of the small package only could be expected to control a limited number of rats or the deletion of all claims and directions pertaining to the control of commensal rats. Allowing for some defending of the food source and repeated feedings over 3-4 pre-moribund days, 4 oz of this product would be unlikely to be provide, reliably, enough bait to kill more than one or two rats.
3. Submit one copy of your final printed labeling before you release the product for shipment.

We have the following additional comments and precautions concerning the labeling, the printing of the labeling, and the product itself.

1. When you print labels, make sure that the subheadings "READ THIS LABEL" and "IMPORTANT" are "parallel" in placement and at least equal in prominence with "USE RESTRICTIONS",

"SELECTION OF TREATMENT AREAS", and "APPLICATION DIRECTIONS". All of these subheadings must be subordinate to "DIRECTIONS FOR USE", which should be centered while the subheadings remain left-justified. When labels are printed, preserve the existing paragraph distinctions. Do not run the numbered items under "IMPORTANT" together in one paragraph. We prefer that all of the use directions appear on one label panel, with the heading "DIRECTIONS FOR USE" being in prominent type and centered at the top of the panel. Make sure that there is a blank line between the heading "DIRECTIONS FOR USE" and the "It is a violation" statement.

- 2. The "wet or damp areas" claims may be retained on the label for the time being, but must either be supported with efficacy data generated with weathered baits (see item 7.5 in Protocols 1.213 and 1.214) Data supporting these claims were requested more than a dozen years ago but have not yet been received. As this request was made of the previous registrant, we do not hold the delinquency of the data against HACO, Inc., but we still must address the issue of the unsupported claims. Within 12 months of the date of this letter, you must either submit acceptable efficacy data generated with weathered bait made according to this product's current formulation or submit proposed revised labels from which all stated or implied claims of weather resistance and all references to uses in "wet or damp area" sites have been deleted. As you report that such studies were expected to be completed by the end of May, 1995, we infer that you intend to support the claim and, if the results are positive, will have little difficulty in meeting the deadline for data submission.
- 3. The "APPLICATION DIRECTIONS" on the current accepted label (stamped on March 1, 1973) and the proposed revised label pertain only to a rodenticide product that is packaged as a "loose-bait" within a single labeled container. The information in the current amendment application also pertains only to "loose-bait" packaging. This product may not be "subpackaged" into placepacks or any other form of use-related "convenience packaging".
- 4. Do not add any claims or directions to the final printed label that were not part of the label stamped "Accepted with Comments", as modified by the changes required by this letter. Doing so could constitute unauthorized and unacceptable amending of the label and lead to regulatory action against the subject product.

If the above conditions of acceptance 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.

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

If you have any questions about this letter, please contact John Bazuin at (703)305-6600.

Sincerely yours,

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

Enclosure: Label stamped "Accepted with Comments"  
OPP Efficacy Protocols 1.213 and 1.214

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ACCEPTED  
with COMMENTS  
in EPA Letter Dated

JUN 6 1995

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

2393-497

RAMIK® BROWN  
EPA Reg. No. 2393-497  
Page 1 of 4

RAMIK® BROWN  
Weather-Resistant Rodenticide  
For Control of Commensal Rats and Mice, Indoors & Outdoors

ACTIVE INGREDIENT:

Diphacinone (2-Diphenylacetyl-1,3	
Indandione).....	0.005%
INERT INGREDIENTS:.....	<u>.99.995%</u>
TOTAL.....	100.000%

KEEP OUT OF THE REACH OF CHILDREN

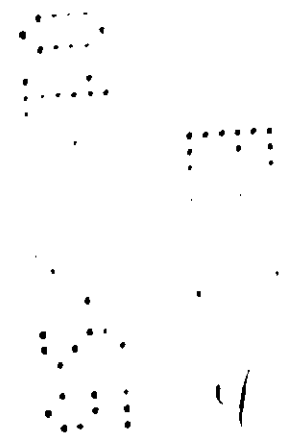
CAUTION

See side panels for additional precautionary statements.

EPA Reg. No. 2393-497  
EPA Est. No. 61282-WI-1

Manufactured For:  
HACO, Inc.  
Madison, WI 53707

NET WEIGHT 50 lbs.



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PRECAUTIONARY STATEMENTS  
HAZARD 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<sub>1</sub>, intramuscularly or orally, as indicated in bishydroxycoumarin overdose. Repeat as necessary based on monitoring of prothrombin times.

IN ALL CASES OF HUMAN INGESTION IMMEDIATELY NOTIFY A PHYSICIAN.

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.

NOTICE OF WARRANTY: Because Manufacturer and Seller have no control over storage, handling, and conditions of use, which are of critical importance, Manufacturer and Seller make no representation or warranty, either express or implied, for results due to misuse, improper handling, or storage of this material. Nor do Manufacturer or Seller assume any responsibility for injury to persons, crops, animals, soil or property arising out of misuse, improper handling or storage of this material.

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 non-target 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, or other potentially destructive animals, or in areas prone to vandalism.

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DIRECTIONS FOR USE (cont.)

3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

**USE RESTRICTIONS:** For control of Norway rats, roof rats and house mice in and around homes, industrial and agricultural buildings, and similar man-made structures. This product is especially suited for use in wet or damp areas, including river banks, gullies, irrigation ditches, railroad tracks, loading areas, in or around rat holes, under granaries, along fences, garbage dumps, and landfills.

Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not apply bait directly to ground surface or in grass or other ground cover. Do not broadcast bait.

**SELECTION OF TREATMENT AREAS:** Determine areas where rats or mice will most likely find and consume the bait. Generally, these 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 seen. Protect bait from rain or snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS

**RATS:** Place 4 to 16 ozs. of bait per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days.

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

**Rats/** Replace contaminated or spoiled bait immediately.  
**Mice** Collect and dispose of all dead animals and leftover bait properly. To prevent reinfestation, limit sources of rodent food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish as needed.

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**STORAGE AND DISPOSAL**

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

**STORAGE:** Store only in original closed container in a cool, dry place inaccessible to children and pets. Store separately from fertilizer and away from products with strong odors which may contaminate the bait and reduce acceptability. Spillage should be carefully swept up and collected for disposal.

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

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

**FIBER DRUMS WITH LINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom. Dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If fiber drum is contaminated, puncture and dispose of in same manner; otherwise, offer drum for recycling or reconditioning.