feg # 2373 - 501

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460.

JUN

6 1995

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: Gold Crest Promar Fish Flavored Bait Pellets

EPA Registration Number 2393-501

Your amended labeling dated December 18, 1994

Dear Ms. Thompson,

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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. A stamped copy is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

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

- When you print labels, make sure that the subheadings "READ 1. 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 subordinant 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 "APPLICATION DIRECTIONS" on the current accepted label (stamped on March 30, 1978) 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".

- 3. 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.
- 4. We note that the minimum packaging size that you have indicated for this product is 4 oz. The smallest packaging size that you may adopt for this product without applying to amend the registration is 1 lb. (16 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 else 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.

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"

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ACCEPTED with COMMENTS in EPA Lotter Dated

PROMAF RAT & MOUSE KILLER EPA Req. No. 2393-501 Page 1 of 4

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PROMAR RAT & MOUSE KILLER Weather Resistant Rodenticide For Control of Commensal Rats and Mice, Indoors & Outdoors

ACTIVE INGREDIENT:

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

KEEP OUT OF THE REACH OF CHILDREN

CAUTION

See side panels for additional precautionary statements.

EPA Req. No. 2393-501 EPA Est. No. 61282-WI-1

Manufactured For: HACO, Inc. Madison, WI 53707

NET WEIGHT 10 Lbs.

PROMAR is a Registered Trademark of HACCO, INC.

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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_1 , 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 hoofed 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

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- RATS: Apply 4 to 16 oz. 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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PROMAR RAT & MOUSE KILLER EPA Reg. No. 2393-501 Page 4 of 4

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.

CONTAINER DISPOSAL:

Non-Household Use Disposal - Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Household Use Disposal - Do not reuse empty container. Securely wrap in newspaper and discard in trash.

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