

SEP 14 1993

541 782 360
18

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

BEST AVAILABLE COPY

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)

MADDEN Disk #2 9/13/93

RANGELAND (Con't.)

BAITING After all or most of the prebait has been eaten, apply pellets only to areas where prebait was consumed. Apply pellets 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 (July-December). Do not apply more than once during this period. Dispose of spilled or uneaten pellets by burial.

COLUMBIAN & RICHARDSON'S GROUND SQUIRREL
USE RESTRICTIONS For control of Columbian (*Spermophilus columbianus*) and Richardson's (*S. richardsoni*) ground squirrels, on rangeland.
BAITING Apply pellets 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.

SUGARCANE

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

PREBAITING To increase acceptance of treated pellets by rats, broadcast three pounds of untreated wheat per acre one or two weeks prior to using toxic pellets.

BROADCAST BAITING Apply five pounds of pellets per acre per treatment. Bait may be broadcast by aircraft, by ground-driven equipment, or by hand (wear rubber gloves during hand broadcast applications).

GOPHERS

USE RESTRICTIONS For control of the Plains pocket gophers (*Geomys bursarius*), Southeastern pocket gophers (*G. pinetis*), yellow-faced pocket gophers (*Perognathomys californicus*), and Thomomys spp. pocket gophers in lawns, golf courses, and other noncrop areas.

HAND BAITING To locate underground runways, use a metal rod or strong smooth stick, or other suitable implement to probe the ground 10 to 15 inches away from fan-shaped gopher mounds. Begin probing on the flat area of the fan. When the main runway has been exposed, the probe will drop about 2 inches due to decreased resistance from soil. Using a long-handled spoon or mechanical probe, drop one teaspoon of bait into the main runway at each baited point. Cover the opening with sod, a rock, or soil to exclude light. Take care not to cover bait with soil. Depending upon mound density, make two to five bait placements per burrow system. Recover and bury all spilled pellets.

ALFALFA AND NONCROP AREAS

USE RESTRICTIONS For control of the Plains pocket gophers (*Geomys bursarius*), Southeastern pocket gopher (*Geomys pinetis*), yellow-faced pocket gopher (*Perognathomys californicus*), and the pocket gopher (*Thomomys* spp.) in alfalfa field and noncrop areas.

HAND BAITING Place one teaspoon (4 grams) of bait at 2-4 locations using a mechanical probe or similar device into the underground runway. After bait is dropped into the probe hole, cover the hole.

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.

KANGAROO RATS

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

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

NONCROP RIGHTS-OF-WAY

USE RESTRICTIONS For control of Columbian ground squirrels (*Spermophilus beecheyi*) on noncrop rights-of-way next to canal and ditch banks and other noncrop habitats 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.

PREBAITING To increase acceptance of pellets by squirrels, broadcast six pounds of untreated wheat per acre along rights-of-way 2-3 days prior to using toxic pellets.

BAITING Broadcast pellets 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 any area more than once per year. When applying bait 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 pellets 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* spp.), thirteen-lined ground squirrels (*Spermophilus tridecemlineatus*), California ground squirrels (*S. beecheyi*), Columbian ground squirrels (*S. columbianus*) and Richardson's ground squirrels (*S. richardsoni*). Do not apply on roads, over water or where plants are grown for food or feed.

HAND BAITING IN NONCROP AREAS (Con't.)

PREBAITING To increase acceptance of treated pellets, squirrels probed with one teaspoon of untreated wheat around each active burrow 2-3 days prior to using toxic pellets.

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

IN AND AROUND BUILDINGS

USE RESTRICTIONS Use against the Norway rat, roof rat and the house mouse, in and around homes, industrial, agricultural and commercial buildings, and similar man-made structures. This product must be placed in locations not accessible to children, pets, domestic animals and wildlife, or in tamperproof bait boxes. Do not place this product in areas where there is a possibility of contaminating feed or surfaces that come in direct contact with feed.

SELECTION OF TREATMENT AREAS After removing as much alternative food as possible, determine dry acid-free areas where rats and mice will most likely find and consume the bait. Generally, these areas are along walls, by grained openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rats and mice or their signs have been observed.

APPLICATION DIRECTIONS FOR NORWAY RAT AND ROOF RAT Apply 1 to 2 teaspoon amounts of the product per placement. For outdoor use, place bait in active rat burrows or tamperproof bait boxes. Maintain an uninterrupted supply of fresh bait until all signs of feeding have stopped. Do not treat the same area with this product at less than 30-day intervals.

APPLICATION DIRECTIONS FOR HOUSE MOUSE Apply 1 teaspoon amount of this product per placement at 8 to 12 foot intervals. For outdoor use, protect bait from rain or snow. Maintain an uninterrupted supply of fresh bait until all signs of feeding have stopped. Do not treat the same area with this product at less than 30-day intervals. Collect and dispose of all dead animals and excess bait properly.

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 100

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

BEST AVAILABLE COPY

BEST AVAILABLE COPY

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. May be fatal if swallowed. Avoid skin contact. Wear rubber gloves when handling this product. Do not breathe dust. Avoid contamination of food or feedstuffs. Avoid contact with acids. Store in a dry place. Do not store around the home. Wash all utensils, spoons, or measuring devices thoroughly after using.

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and fish. Birds and other wildlife feeding on treated pellets 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 pellets. Keep out of lakes, streams, ponds and all aquatic systems. Do not apply where runoff from this product will enter an aquatic system. Do not contaminate water when disposing of equipment washwaters. Check for and dispose of excess or spilled pellets and carcasses daily until the pellets are expended or are removed.

ENDANGERED SPECIES CONSIDERATIONS:

Whooping Crane (*Grus americana*)
Do not use this product 30 days prior to arrival and 30 days after the whooping crane leaves known crane habitat.

Amador's greater prairie chicken (*Tympanuchus cupido adairi*)
Do not use this product in the presently occupied range of the Amador's greater prairie chicken in the following Texas counties: Aransas, Austin, Brazoria, Colorado, DeWitt, Fort Bend, Galveston, Goliad, Harris, Reagan, Victoria, Waller, and Wharton.

Yellow-shafted Black bird (*Agelaius phoeniceus*) and Puerto Rican Plain Pigeon (*Columba inornata martinicensis*)

This product must not be used in the following areas except in bumper-proof bait boxes (within 10 kilometers of Central Aquino, Lago Chilo, Colón, 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).

Self-maintaining mouse (*Reithrodontomys reithrodontomys*)
Do not use this product within 1/2 mile (1 ball marsh vegetation and/or brushy water wetlands which are located (1) near or adjacent to San Pablo Bay and San Francisco Bay or (2) in the Sacramento River below or adjacent to the confluence of the Sacramento River and the San Joaquin River (California).

ENDANGERED SPECIES CONSIDERATIONS (Cont.)

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

Neotoma Canada goose (*Branta canadensis leucophaea*)
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 purchase, use overlap 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 of 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.

RE-ENTRY STATEMENT

Do not enter treated areas until protective clothing and dusts have settled. Because certain crops may require more specific re-entry intervals for various crops, treated with this product, consult your State Department of Agriculture for further information. 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. 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: CAUTION: Area treated with zinc phosphide on (date of application). Do not enter treated area the day of

RE-ENTRY STATEMENT (Cont.)

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 Statement 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 the Agricultural Areas Listed on this label: Pellets must not be applied on roads, near residential areas or over water. Do not broadcast over growing crops other than sugarcane. Apply pellets on warm, clear days. Do not graze animals in treated areas.

GRAPE VINEYARDS

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

BROADCAST BAITING: Broadcast pellets evenly on the ground between the rows by cyclone seeder or by hand (wear rubber gloves during hand broadcast application). Apply pellets at a rate of 8-10 pounds per acre. Do not apply by air.

MACADAMIA NUT ORCHARDS

USE RESTRICTIONS: For control of roof rats (*R. rattus*) in Macadamia Nut orchards.

SPOT TREATMENT: Bait may be placed in bait stations on the ground or in stations in trees. Place 4-6 grams (1-2 teaspoons) of bait in stations at the base of each tree and in each station in trees. Unbaited bait must be removed from trees prior to shaker harvest or from ground prior to macadamia harvest. Orchards may be treated up to 30 days prior to a harvesting round.

BURROW TREATMENT: Place 4-6 grams (1-2 teaspoons) of bait in each burrow. No preharvest interval is required, provided nuts are not retrieved from burrows.

BROADCAST BAITING: Broadcast at the rate of five (5) pounds of bait per acre in orchard using a ground device or by hand. Ayclon may be used to treat adjacent noncrop areas if recommended and supervised by the Hawaii Dept. of Health. The number of applications shall not exceed four (4) per year. The total amount of bait applied shall not exceed 20 pounds per acre per year.

NURSERY STOCK ORNAMENTAL AND NON-BEARING FRUIT TREES

USE RESTRICTIONS: For control of meadow, prairie and pine voles (*Microtus* spp.) 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. Concentrate in areas with the heaviest vegetation cover. Do not broadcast bait on bare ground. Apply at a rate of 8-10 pounds per acre.

HAND BAITING: Near the base of infested stock, place teaspoonful quantities of pellets in 2-4 locations, either on surface trails or at the mouths of holes leading to underground burrow systems. Do not allow pellets 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* spp.) in orchards and groves. This product is to be applied during the dormant season. Apply pellets after harvest while the orchard or grove is in a non-bearing phase. Do not apply to bare ground.

SPOT OR TRAIL BAITING: Place 1 teaspoon of pellets in surface trails or at the mouths 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 pellets by pulling overhanging grass back in place. Use 2 to 3 lbs. pellets per acre.

BAIT PLACEMENT STATION: Place 2.5 ounces under at least two established seasons 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 or fiberglass rays or wood or metal at the tree drip line.

BROADCAST BAITING: This product may be broadcast by cyclone, cyclone seeder, or by hand. When applying by hand (wear rubber gloves during hand broadcast operation), throw teaspoon amounts into heavy cover along tree rows, neck outcrops, and fence lines. Pellets should be applied at the rate of 8 to 10 pounds per acre.

RANGELAND

USE RESTRICTIONS: For control of prairie dogs, black-tailed (*Cynomys ludovicianus*), white-tailed (*C. leucurus*), and Gunnison's (*C. gunnisoni*) on rangeland in Western United States: Arizona, Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, Utah and Wyoming.

PREBAITING: To increase acceptance of treated pellets by prairie dogs, prebait with one teaspoon of untreated wheat per mound, one or two days prior to using toxic pellets. Establish observation period during prebaiting.

...with plenty of water. Get
medical attention if irritation persists.
IF ON SKIN: Remove contaminated clothing
and wash affected areas with soap and water.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. May be fatal or harmful if swallowed. Avoid skin contact. Wear rubber gloves when handling this product. Do not breathe dust. Avoid contamination of feed or foodstuffs. Avoid contact with acids. Store in a dry place. Do not store around the home. Wash all utensils, spoons, or measuring devices thoroughly after using.

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and fish. Birds and other wildlife feeding on treated pellets 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 pellets. 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 pellets and carcasses daily until the pellets are expended or are removed.

See Attached Booklet For Endangered Species Considerations, additional precautionary statements, re-entry and directions for use.

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

BEST AVAILABLE COPY



Manufactured For:

HACO, inc.

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

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.

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.