

SEP 14 1993

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18

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)

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**BEST AVAILABLE COPY**

**STATEMENT OF PRACTICAL TREATMENT**

Any person applying this pesticide product and experiencing signs and symptoms such as nausea, dizziness, 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.

**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 food or feedstuffs. Avoid contact with acids.

**ENVIRONMENTAL HAZARDS**

This product is toxic to birds and other wildlife. Do not allow pellets to be exposed on soil surface. Do not apply where runoff is likely to occur. Keep out of any body of water. Check for and dispose of excess or spilled pellets and carcasses daily until the pellets are expended or are removed.

**DIRECTIONS FOR USE**

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

**MOLES AND POCKET Gophers—Use Restrictions:** For use against moles and pocket gophers in lawns, golf courses, and other noncrop areas. Do not apply in gardens and areas where food or feed may be contaminated. Only apply the bait underground. Collect and bury all dead animals found above the ground. This product is to be used in manual applications only. Do not apply this product by use of an artificial burrow builder.

**Specific Direction For Moles:** The presence of moles may be indicated by a network of surface ridges in the turf, by a series of conical mounds of earth pushed up from deep burrows, or by damage to turfs.

**Surface Ridges:** Prior to treatment determine which burrows are active according to one of the following two methods. Either press down a

small section of the tunnel or remove a one inch section of the tunnel's roof. Mark these sections and recheck in 24 hours. The burrow is considered active if the flattened runway has been raised up or if the roof has been repaired. Only treat active burrows.

**Carefully punch a hole in the top of active tunnels, drop a teaspoon amount of this product and carefully close the hole with sand or stone. Do not collapse the runway again or allow loose soil to cover the bait. After a few days check to see if the burrows are still active according to one of the two methods described above. If so, repeat treatment.**

**Conical Mounds:** Remove center plug from the conical mounds with aid of a long-handled spoon and drop a teaspoon amount of this product into the underground tunnel. Close opening with rock or soil. Do not allow loose dirt to cover bait.

**Bait Protection (Fall Planted):** Pack about one-quarter inch of soil against each bulb. Place several pellets of sides of and around the bulb. Then cover.

**Specific Directions For Pocket Gophers:** Burrowing pocket gophers (*Thomomys* spp. and *Geomys* spp.) throw out low, fan shaped mounds on either side of their underground tunnels. These lateral tunnels coming to the surface are on the flat side of the fan and are plugged with soil. With a long-handled spoon carefully remove the plug. Insert a teaspoon of this product as far down as possible. Replace opening, being careful not to cover bait with soil.

**RATS AND MICE—Use Restrictions:** Use against the Norway rat, roof rat and the house mouse, in and around homes, industrial, agricultural and commercial buildings, and similar manmade 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 food or surfaces that come in direct contact with food.

**Selection of Treatment Areas:** After removing as much 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 gnawed 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 this 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 feet 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.

**DISPOSAL**

Do not reuse empty container. Wrap container and put in trash collection.

**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.

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**ACCEPTED**  
**SEP 14 1993**  
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 2393-524

288