

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 8, 2003

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

Attention: Ms. Judith A. Thompson

Subject: Zinc Phosphide Rodent Pellets
EPA Reg. No. 2393-522
Our letter of October 31, 2002
Your letter of November 12, 2002

- Purpose** The purpose of this submission is to revise your labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is to revise your label according to our October 31, 2002, letter.
- Review of label** The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling to us before you release product for shipment. A copy of the stamped label is enclosed for your records.
- Existing stocks** Stocks of existing labels may be used for eighteen (18) months.
- Consequence for non-compliance** If this condition is not complied with, the registrations will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of this condition.

Questions If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock,dan@epa.gov (by E-Mail).

Sincerely yours,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Letter location Disk 91,A:\Zinc Phosphide\2393-522, revised label per last ltr, 1-1-2003.wpd
January 1, 2003

ZINC PHOSPHIDE RODENT PELLETS

Kills Moles, Gophers, Rats and Mice

ACTIVE INGREDIENT:

Zinc Phosphide 2.0%

INERT INGREDIENTS: 98.0%

Total 100.0%

EPA Reg. No. 2393-522

EPA Est. No. 61282-WI-1

KEEP OUT OF REACH OF CHILDREN CAUTION

See Side Panels for additional precautionary statements and directions for use

FIRST AID	
Have label with you when obtaining treatment advice. Any person applying zinc phosphide products and experiencing signs and symptoms such as nausea, abdominal pain, tightness in the chest, or weakness, should be seen by a physician immediately.	
If swallowed:	<ul style="list-style-type: none"> Call a poison control center, doctor, or 1-800-228-5635, ext. 136, immediately for treatment advice or transport the patient to the nearest hospital. Do not drink water. Do not administer anything by mouth. Do not induce vomiting unless told to do so by the poison control center or doctor.
If on skin or clothing:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
If inhaled:	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing call an ambulance, then give artificial respiration preferably mouth-to-mouth, if possible.
If in eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
Call a poison control center, doctor, or 1-800-228-5635, ext. 136, immediately for treatment advice.	

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 eye or skin contact. Wear rubber gloves when handling this product. Do not breathe dust. Wash thoroughly with soap and water after handling. Avoid contamination of food or foodstuffs. Avoid contact with acids.

NET WEIGHT:

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. 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. Check for and dispose of excess or spoiled pellets and carcasses daily until the pellets are expended or are removed.

Notice: It is a federal offense to use any pesticide in a manner that results in the death of a member of an endangered species. The use of this product may pose a hazard to Federally designated endangered/threatened species. Suggested measures to protect endangered species in your county may exist in an EPA "Interim Measures" pamphlet. You may call EPA's Endangered Species Hotline, 1-800-447-3813, to find out if an "Interim Measures" pamphlet exists for your county and have one sent to you. You can also consult your local county extension office or pesticide state lead agency to determine whether they have imposed any requirements in your area to protect endangered and threatened species.

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.

LAWNS, GOLF COURSES, NON-CROP AREAS

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 bulbs.

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 sod 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 sod. Do not allow loose dirt to cover bait.

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

RECORDED
with COMMENTS
in EPA Letter Data

JAN 8 2003

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

2393-522

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 tunnel. 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. Reclose opening being careful not to cover bait with soil.

IN AND AROUND STRUCTURES

Important: Do not expose children, pets, or other nontarget 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 nontarget 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, other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

Use Restrictions: Use against Norway rats, roof rats and house mice, in and around homes, industrial, agricultural and commercial buildings, and similar manmade structures. 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 seen. Protect bait from rain or snow. Remove as much alternative food as possible.

Application Directions:

RATS: Apply 1 to 2 teaspoon amounts of this product per placement. Maintain an uninterrupted supply of fresh bait until all signs of feeding have stopped.

MICE: Apply 1 teaspoon amount of bait at 8- to 12-foot intervals. Maintain an uninterrupted supply of fresh bait until all signs of feeding have stopped.

RATS AND MICE: Replace contaminated or spoiled bait immediately. 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. Do not treat the same area with this product at less than 30 day intervals

STORAGE & DISPOSAL

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

STORAGE: Store only in original container, in a dry acid-free place inaccessible to children and pets.

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 container. Then 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.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

Manufacturer and Seller warrant that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Manufacturer, and Buyer and User assume the risk of any such use. MANUFACTURER AND SELLER MAKE NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no event shall Manufacturer or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF MANUFACTURER AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF MANUFACTURER OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Manufacturer and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Manufacturer.

Manufactured For:
HACO, Inc.
P.O. Box 7190, Madison, WI 5370