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OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

R & M Exterminators South 24212 D Street Cheney, Washington 99004

Attention: Harold L. Jackson

Subject: Vole Bait Containing Zinc Phosphide

EPA Registration Number 4271-16

Your letter dated June 15, 1994 and amended label

Dear Mr. Jackson,

Thank you for your submission of the revised labeling for the subject product to comply with Pesticide Regulation Notice 93-1, which requires registrants of restricted use products to indicate the reason the products are restricted.

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

- Change the clarifying phrase, "DUE TO HIGH ACUTE 1. TOXICITY" which you added after "RESTRICTED PESTICIDE" to "DUE TO HAZARD TO NON-TARGET ORGANISMS". The former phrase is one of the criteria in 40 CFR § 152.175 that could apply if this product were labeled for a domestic use or if it had a much higher percentage of the active ingredient. The phrase it must be changed to is the one that applies for Zinc Phosphide products with greater than a 10% content of the active ingredient and that are labeled for non-domestic uses.
- 2. Submit one copy of your final printed labeling before you release the product for shipment.

If these conditions 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 stamped copy of the labeling is enclosed for your records.

Sincerely yours,

Robert A. Forrest

Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure: Stamped label

RECOMMENDED APPLICATIONS			
CROP	INSECT	PINTS	REMARKS -
Cotton	Tobacco budworm Cotton bollworm Lygus (Nymphs)	1 to 2	Apply specified dosage per acre by air or ground equipment atomor in sufficient water or refined vegetable oil for complete coverage. For best results during mid-to-late season or under ho dry conditions use 3 to 5 gallons of water per acre by air. When using oil, use at least one (1) quart total volume per acre. Pre mix material. Oil mixture should be sprayed within 12 hours to avoid compatibility problems. Always run a small ja compatibility test before large scale mixing, as batches of vegetable oil tend to very in composition.
	Fall armyworm Beet armyworm Pink bollworm	1-1/3 to 2	For application by sprinkler irrigation systems: Apply specified dosage per acre. Follow all directions given under the CHEMIGATION section of this label.
			For best control of bollworms, budworms and armyworms, make applications within 3 days of egg hatch and before young larvae migrate to squares, blooms, or bolls.
	Fleahoppers	2/3	Cotton bollworm and tobacco budworm: apply on a 5 to 7 day interval as needed, beginning when scouting indicates local egg or larval treatment thresholds have been reached. Fo light infestations of larvae (1st and 2nd instar) apply 1 pint (3/4 lb active) per acre. For moderate infestations of larvae (1st and 2nd instar) apply 1-1/3 pt (1 lb active) per acre. For heavy infestations of larvae (1st and 2nd instar), make 2 applications of the 2 pt (1-1/2 lb active) rate per acre to bring infestations unde control. Then reduce rate to 1-1/3 pt (1 lb active) per acre.
	Suppression of: Lygus (adults) Whiteflies (except sweet potato whitefly) Spider mites (Carmine and two-spotted)	2/3 to 2	In California and Arizona the minimum use rate for control of larvae is 1-1/3 pt (1 lb. active) per acre, regardless of degree of infestation of tobacco budworm or cotton bollworm.  NOTE: In areas of frequent rainfall the higher rates and close spray intervals (5-day minimum interval required) may be neede for adequate control.  For ovicidal effect: apply 1/3 pt (1/4 lb active) per acre. Time
	For early to mid-season use in Southern	1/3	applications for the "brown egg" stage just prior to egg hatch Higher rates of BOLSTAR 6 or a tank mix with another larvicid will be required for control of larvae.
	cotton growing areas  Thrips (Except western flower thrips) Fleahoppers Plant bugs		Armyworms: make 2 applications 5 days apart when larvae firs appear. For light infestations of 1st and 2nd instar larvae appl 1-1/3 pt (1 lb active) per acre. For moderate infestations of 1st and 2nd instar larvae apply 1-2/3 pt (1-1/4 lb active) per acre. For heavy infestations of 1st and 2nd instar larvae apply 2 pt (1 1/2 lb active) per acre.
	Ovicidal Effect Cotton bollworm Jobacco budworm	1/3	Early to mid-season thrips, fleahoppers, and plant bugs: appl 1/3 pt (1/4 lb active) per acre during early to mid-season whe thrips, fleahoppers, or plant bugs reach economic threshold.
	•		In any case do not apply more than a total of 8 pt per acre with the last application no closer to harvest than 21 days. California and Arizona, or 14 days in all other states. Allow a least 5 days between applications. Do not graze treated fields

NOTE: BOLSTAR 6 when used on cotton may be tank-mixed with GUTHION 2L or GUTHION 2S when GUTHION is used for control of cotton insects at the recommended rates of GUTHION.

Do not apply GUTHION alone within 14 days of harvest of cotton after applying tank mixes of BOLSTAR plus GUTHION. In California and Arizona, GUTHION alone should not be applied within 21 days of harvest of cotton after applying this tank mix.