

PM-14

Reg # 7122-66

MAY 18 1995



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

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OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

ArChem Corporation  
1514 11th Street  
P.O. Box 767  
Portsmouth, Ohio 45662

Attention: Howard Arbaugh

Subject: Rodere Rat Bait  
EPA Registration Number 7122-66  
Your amended labeling dated December 9, 1994

Dear Mr. Arbaugh,

We have reviewed the labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, and pursuant to PR Notice 94-7. This labeling is acceptable provided that you make the following changes and accommodate the following considerations:

1. The organization of subheadings within the "DIRECTIONS FOR USE" on your proposed revised label is acceptable. When you print labels, make sure that the subheadings "READ 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. Indent the text in item 2 under "IMPORTANT" so that the second line and all subsequent lines begin directly below the "A" in "Apply". Make sure that the type used is legible and of a size large enough to be read easily.
2. Delete from the label the "INSTRUCTIONS" section which appears on the right side panel, below the "ENVIRONMENTAL HAZARDS" section. The heading "INSTRUCTIONS" is inappropriate as it might draw attention away from the "DIRECTIONS FOR USE". The content of this section is inappropriate. To our knowledge, you have not supported the claims made for this product, let alone those which pertain to any special effectiveness that the bait might have in "areas that may have excessive dampness". Note that the use sites permitted by the "USE RESTRICTIONS" generally would not be expected to be excessively wet or damp.

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- 3. Do not add any claims or directions to the final printed label that were not part of the stamped-accepted label.
- 4. Submit one copy of your final printed labeling before you release the product for shipment.

We have the following additional observations concerning the labeling of the subject product:

- 1. The "APPLICATION DIRECTIONS" on the current accepted label, which was stamped on July 7, 1970, and the proposed revised label pertain only to a rodenticide product that is packaged as a "loose bait" within a single labeled container. The registration of this product does not cover anything but "loose-bait" packaging. This product may not be "subpackaged" into placepacks or any other form of "convenience packaging" such as bait trays or ready-to-use, self-feeding bait stations. Note that only one size of pellets may be sold under a single registration number.
- 2. We note that your proposed revised labels refer to a one-pound container of bait and that no additional information on net contents appears on your amendment application of December 9, 1994. The smallest packaging size that you may adopt for this product without applying to amend the registration is one pound (16 oz.). Packages smaller than one pound would require adding text to the label to indicate that the contents of the product only could be expected to control a limited number of rats.

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.

A stamped copy of the labeling is enclosed for your records. 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)

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**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 nontarget animals to rodenticides. To help 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 other 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 closed, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to holed livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
- 3. Dispose of food product container and unused, spoiled, and unconsumed bait as specified on this label.

**USE RESTRICTIONS-** For control of Norway Rats, roof rats, in and around homes, industrial buildings, and similar man-made structures. 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 broadcast bait.

**SELECTION OF TREATMENT AREAS**

Determine areas where rats and/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 observed. Remove as much food as possible.

**APPLICATION DIRECTIONS**

**RATS:** Apply 4 to 16 ounces of bait per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days. 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. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent stations and replenish as needed.



EPA Est 7122-OH-1  
EPA Reg 7122-66

NET CONTENTS: 1 LB.  
GRAMS: 454

**STORAGE:** Store only in original container. In a cool, dry place.  
**DISPOSAL:** Do not reuse empty container. Crush and dispose of in a sanitary manner.

**PRECAUTIONS**  
**HAZARD TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Keep away from humans, domestic animals, and birds. Avoid contact with skin, eyes, nose, and mouth. Do not breathe dust. Do not swallow. Do not eat, drink, or use tobacco while using this product. Wash hands thoroughly after handling. Do not use in areas where food is prepared or consumed. Do not use in areas where food is stored.

**NOTE TO PHYSICIAN:** If ingested, administer Vitamin K1. Repeat as necessary based on monitoring. If swallowed: Call a physician or Poison Control Center. Do not induce vomiting. If swallowed by humans, domestic animals, or pets, cause bleeding. In such case, intravenous and oral Vitamin K1 are indicated as in the case of hemorrhage caused by this product.

**ENVIRONMENTAL PRECAUTIONS:** This product is toxic to mammals and birds. Do not use in areas where water is present or to intertidal areas below the mean low water mark.

Paraffin baits are not to replace regular meal baits and make them more effective. Buyer assumes all risks of use, storage, and disposal. Directions given hereon.

*Or Chem Corp*  
1414 Elmwood Street • Portsmouth, Ohio 43082 • Phone 814/333-1111

ACCEPTED  
with COMMENTS  
by EPA Letter Dated

MAY 18 1995

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 7122-66

BEST COPY AVAILABLE