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Mr. Stephen Smith
LiphaTech, Inc.
3600 West Elm Street
Milwaukee, WI 53209

AUG 11 1992

Dear Mr. Smith:

Subject: Ridall-Zinc® Rodent Field & Agricultural Bait
EPA Registration No. 7173-195
Your Letter Dated August 3, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below.

1. Under RESTRICTIONS FOR USE for GOPHERS AND MOLES, change "Similarly RIDALL-ZINC . . ." to "Similarly, RIDALL-ZINC . . . and Western U.S.".
2. Also under RESTRICTIONS FOR USE for GOPHERS AND MOLES, italicize the scientific names of the pest species in the sentence "Similarly RIDALL-ZINC . . . and Western U.S.".

A stamped copy of the label is enclosed for your records.

Submit one copy of the finished labeling before releasing the product for shipment.

Sincerely yours,

RAF

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

08/11/92:ERICKSON:DISK4:7173-195.LB2

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. Do not breathe fumes or dust. May be fatal if swallowed. Do not allow contact with skin. Wash hands after use. Do not use near food or feed-stuffs. Keep away from children. Wear gloves and protective clothing when using bait. Do not use or store in house.

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and fish. Birds and other wildlife feeding on treated bait 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 bait. Keep out of lakes, streams, ponds, and aquatic systems. Do not apply where run-off from this product will enter an aquatic system. Check for and dispose of excess spilled bait and carcasses daily until the bait is expended or removed.

ENDANGERED SPECIES CONSIDERATIONS

Before field use of this product, consult Federal, state and local game authorities to determine if the following wildlife are found in the area. If so, observe the following:

-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.

-Attwater's Greater Prairie Chicken (*Tympanuchus cupido attwateri*). Do not use this product in the presently occupied range of the Attwater Greater Prairie Chicken in the following Texas counties: Aransas, Austin, Brazoria, Colorado, Duvall, Fort Bend, Galveston, Goliad, Harris, Refugio, Victoria, Waller and Wharton.

-Yellow-Shouldered Black Bird (*Agelaius phoeniceus*) and Puerto Rican Plain Pigeon (*Columba inornata martinicensis*). This product must not be used in the following areas except in tamper-proof bait boxes (within 10 kilometers of central Aquila, Lago Cidra, Caba, 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 parvidens*). Do not use this product in the range of the Utah Prairie Dog (Utah).

-Salt Marsh Harvest Mouse (*Reithrodontomys raviventris*). Do not use this product within 1/2 mile of salt marsh vegetation and/or brackish water wetlands which are located (1) near or adjacent to San Pablo Bay and San Francisco Bay or (2) in the Sacramento River basin adjacent to the confluence of the Sacramento River and the San Joaquin River (California).

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

-Attention Canada Geese (*Branta canadensis*). Do not use this product from October to March in the federally designated geese hunting areas in the state of California. See current duck & 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.

This bait must not be applied on roads, near residential areas, or over water. Do not broadcast over growing crops other than sugarcane. Apply bait on warm, clear days. Do not graze animals in the treated area.

ORCHARDS, VINEYARDS, NURSERIES, NON-BEARING FRUIT TREES, ORNAMENTALS

RESTRICTIONS FOR USE: Use RIDALL-ZINC to control Meadow Voles (*Microtus pennsylvanicus*), Pine Voles (*M. pinetorum*) in orchards, vineyards, non-bearing fruit trees and ornamentals. Bait applications should be made during the non-bearing season when the grass is not yet matted.

BAITING: Provide bait at 2-5 locations on trails or near burrow openings adjacent to damaged trees (one teaspoon per bait point). Do not make broadcast application of bait over growing crops when the bait may lodge on the plants. Do not apply the bait to bare ground. Bait at the rate of 4 - 10 lb per acre in vole infested areas. If a trail builder is used, apply one teaspoon of bait at 5-foot intervals in the artificially made runway around infested trees. If heavy rains occur after baiting or additional mice move into area, additional treatment may be necessary. For aerial application apply at the rate of 4 - 10 lb per acre. As with broadcasting do not apply on bare ground or growing crops.

SUGARCANE

RESTRICTIONS FOR USE: Use RIDALL-ZINC to control Roof Rats (*Rattus rattus*), Rice Rats (*Oryzomys palustris*), and Cotton Rats (*Sigmodon hispidus*) in Florida and Roof Rats, Norway Rats (*R. norvegicus*), and Polynesian Rats (*R. exulans*) in Hawaii.

BAITING: Apply untreated rolled oats or barley (prebait) at the rate of 5 lb per acre to condition rats to extra food supply 2-4 days before baiting. This will increase acceptance of the bait. RIDALL-ZINC bait material must not be applied to sugarcane that is less than 6 months of age nor within 30 days of harvest. The total number of bait applications must not exceed four, and the total bait applied shall not exceed 20 lb per acre. Broadcast the bait with a ground spreader or an aircraft at the rate of 5 lb per acre.

RANGELANDS

RESTRICTIONS FOR USE FOR CONTROL OF PRAIRIE DOGS: Use RIDALL-ZINC to control Blacktailed Prairie Dogs (*Cynomys ludovicianus*) and White-tailed Prairie Dogs (*C. leucurus*) on rangelands in the western U.S. (Colorado, Montana, Arizona, New Mexico, Texas, Oklahoma, Kansas, Nebraska, North & South Dakota). Use this bait only in areas not inhabited by Black-footed Ferrets. Consult local state and Federal Wildlife authorities concerning the range of the Ferret before using RIDALL-ZINC.

BAITING: Use a prebait of one teaspoon of untreated rolled oats or barley placed near each active mound 2-4 days before using RIDALL-ZINC bait. This will increase bait acceptance of the bait. When 50% of the mounds are prebaited, use one teaspoon of bait placed within a one-foot radius of each mound entrance. The recommended baiting time is from July to December.

RESTRICTED-USE PESTICIDE

For retail sale and use only, by Certified Applicators or persons under their direct supervision and only for the uses covered by the Certified Applicator's Certification.

RIDALL-ZINC®

RODENT FIELD & AGRICULTURAL BAIT

For Use In The Control Of:

- Gophers & Moles
- Rats in sugarcane
- Prairie Dogs (grasslands)
- Ground Squirrels (noncrop use)
- Pine & Meadow Voles (orchards & noncrop areas)

Active ingredient:	1.00%
Zinc Phosphide	98.12%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

STATEMENT OF PRACTICAL TREATMENT

- Any persons applying zinc phosphide products and experiencing signs and symptoms such as nausea, abdominal pain, tightness in the chest, or weakness, should see a doctor immediately.
- If swallowed, drink 1-2 glasses of water and induce vomiting by touching the back of the throat with the finger. Avoid the use of oil. Have person lie down and keep warm. Do not induce vomiting or give anything by mouth to an unconscious person.
- If on skin or eyes, flush with plenty of water.
- See bait side for additional precautionary statements.

Manufactured by:
AlphaTech Inc.
3161 W. Custer Ave.
Milwaukee, WI 53220

NET CONTENTS: 45 LB (20.25 KG)

INSTRUCTIONS FOR USE CONTINUED

with only one application each year. Bury the untreated bait or dead animal found.

FOR THE CONTROL OF GROUND SQUIRRELS: Use RIDALL-ZINC to control California Ground Squirrels (*Spermophilus beecheyi*) and Richardson's Ground Squirrels (*S. richardsoni*) in the Western U.S.

BAITING: Prebait with one teaspoon of rolled oats or barley near each active burrow system. After 2-4 days apply RIDALL-ZINC at the rate of one teaspoon of bait near each active burrow. Place the bait on bare soil. Apply bait in the mid-afternoon so most squirrels will emerge inside the burrows. The recommended baiting time is late spring and early summer (April-June) as soon as squirrels emerge from hibernation.

NON-CROP AREAS

RESTRICTIONS FOR USE—HAND BAITING: Use RIDALL-ZINC to bait areas such as right-of-ways, golf courses, nurseries and lawns to control California Ground Squirrels (*Spermophilus beecheyi*), Richardson's Ground Squirrels (*S. richardsoni*), Thirteen-lined Ground Squirrels (*S. tridecemlineatus*), Meadow Voles (*Microtus pennsylvanicus*) and Pine Voles (*M. pinetorum*). Do not apply bait over areas where plants are used as food or food, on roads or over water (such as lakes).

BAITING: For ground squirrel control, use untreated rolled oats or barley and place one teaspoon of grain near active burrows 2-4 days before baiting. Apply one teaspoon of RIDALL-ZINC near active burrows or runways directly on bare ground. Bury all dead animals found and the untreated bait. For Meadow and Pine Vole control provide bait in 2-5 locations on trails or near burrow openings adjacent to damaged trees—use one teaspoon per bait point. Do not apply to bare ground. Bait at the rate of 4 lb per acre in infested areas. If a trail builder is used, apply RIDALL-ZINC at the rate of one teaspoon of bait at 5-foot intervals in the artificially made runway around infested trees. If heavy rains occur after baiting or additional mice move into area, additional treatment may be necessary.

BROADCAST BAITING: Use RIDALL-ZINC along non-crop right-of-ways to control California Ground Squirrels, Richardson's Ground Squirrels, and Thirteen-lined Ground Squirrels along field borders or ditch banks during a 3-month period after squirrel emergence from hibernation (April-June). Use rolled oats or barley as a prebait and apply over the area at a rate of 4 lb per acre 2-4 days before providing RIDALL-ZINC. This should increase bait acceptance. Broadcast in 20-foot swaths using hand- or ground-driven equipment at a rate not to exceed 4 lb per acre. Apply bait in the mid-afternoon so most animals will emerge in their burrows. Do not broadcast near homes where food or feed is grown or on roads. Consult wildlife authorities for local regulations. In right-of-ways bait may only be applied between the bottom of the ditch and the property. Always bury excess bait left in the equipment. For control of Meadow and Pine Voles, prebait the infested area by broadcasting rolled oats or barley at the rate of 4 lb per acre 2-4 days before applying the bait. Using hand- or mechanically-driven equipment, apply RIDALL-ZINC in 20-foot swaths at a rate not to exceed 4 lb per acre.

ACCEPTED
with COMMENTS
in EPA Letter D-92-04

AUG 11 1992

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

7173-195

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EPA