



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 4, 2016

Carrie Crawford
Regulatory Consultant for Roxide International, Inc.
Roxide International, Inc.
P.O. Box 239
Larchmont, NY 10538

Subject: Label Amendment – Revising state-specific language for North Carolina, general label updates and revisions
Product Name: Revenge Rodent Smoke Bomb
EPA Registration Number: 9086-4
Application Date: 12/15/2015
Decision Number: 505780

Dear Ms. Crawford:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Lisa Pahel by phone at (703) 347-0459, or via email at pahel.lisa@epa.gov.

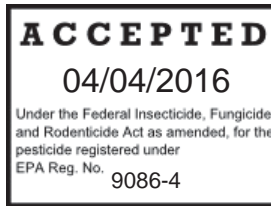
Sincerely,

A handwritten signature in cursive script that reads "Heather Garvie".

Heather Garvie, Product Manager 24
Fungicide and Herbicide
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

[OUTER PACKAGE LABEL]



REVENGE RODENT SMOKE BOMB

THIS PRODUCT MAY BE USED ON LAWNS, PARKS, GOLF COURSES, RANGELAND,
REFORSETED AREAS, OPEN FIELDS, MEADOWS, AND NON-CROP AREAS.

Do not use in, under or near buildings, homes, porches or any structure.

OPTIONAL MARKETING STATEMENT:

Kills Gophers, Moles**, Woodchucks*, Norway Rats**, Skunks, & Ground Squirrels

*Not for Use on Woodchucks in California

** Use in North Carolina on Norway rats and moles (excluding star-nosed mole) only.

ACTIVE INGREDIENTS:

Sulfur-----	39.4%
Potassium Nitrate-----	38.8%
Charcoal Carbon-----	9.3%

OTHER INGREDIENTS: -----	<u>12.5%</u>
TOTAL: -----	100.0%

Keep Out Of Reach Of Children

WARNING

See back panel and Insert for additional precautions, use directions, and restrictions, and endangered species considerations.

Net Contents when packed: 4 OZ. (113.4g)
Contains 4 Rodent Smoke Bombs

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
If Swallowed	<ul style="list-style-type: none"> • Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice. • Have person sip a glass of water if able to swallow. • 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. • Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.
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. • Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.
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 1-800-222-1222 immediately for treatment advice.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Causes eye irritation. Harmful if absorbed through skin. After ignition, cartridge produces toxic gases (such as oxides of sulfur gases and carbon monoxide). Fumes from ignited cartridge may be harmful if inhaled. Do not get in eyes or on skin or clothing. Do not breathe fumes. Wash thoroughly with soap and water after handling.

Environmental Hazards

This product is toxic to wildlife. Check all burrows for signs of nontarget species. If present do not treat burrows. See "Package Insert" for complete Environmental Hazards text including ENDANGERED SPECIES CONSIDERSTIONS.

Chemical Hazards

Once ignited by the fuse. This cartridge will burn vigorously until completely spent and is capable of causing severe burns to exposed skin and clothes, and igniting dry grass, leaves and other combustible materials. Keep ignited cartridge away from your face.

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: Nonrefillable Container. Do not reuse or refill this container.

IF EMPTY: Place in trash or offer for recycling if available.

IF PARTLY FILLED: To dispose of unused cartridges, soak in water, crush, and bury in at least 6" of loose soil. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE

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

See "insert" for complete use directions and use restrictions.

[LABEL INSERT]

Got Pests...Get Revenge Rodent Smoke Bomb Instructions

Before applying product, read entire labeling (Outer Package, Cartridge, and Insert Labels) for information on ingredients, storage/disposal, use directions, and precautions.

This Insert includes the “**Environmental Hazards**” text, included “**ENDANGERED SPECIES CONSIDERATIONS**”, and the “**DIRECTIONS FOR USE**”.

ACTIVE INGREDIENTS:

Sulfur-----39.4%
Potassium Nitrate-----38.8%
Charcoal Carbon-----9.3%

OTHER INGREDIENTS:-----12.5%

TOTAL:-----100.0%

Keep Out Of Reach Of Children

WARNING

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
If Swallowed	<ul style="list-style-type: none">• Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.
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PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Causes eye irritation. Harmful if absorbed through skin. After ignition, cartridge produces toxic gases (such as oxides of sulfur gases and carbon monoxide). Fumes from ignited cartridge may be harmful if inhaled. Do not get in eyes or on skin or clothing. Do not breathe fumes. Wash thoroughly with soap and water after handling.

Environmental Hazards

This product is highly toxic to wildlife. Check all burrows for signs of nontarget species. If present, do not treat burrows.

Chemical Hazards

Once ignited by the fuse, this cartridge will burn vigorously until completely spent and is capable of causing severe burns to exposed skin and clothes, and of igniting dry grass, leaves and other combustible materials. Keep ignited cartridge away from your face.

ENDANGERED SPECIES CONSIDERATIONS

General Considerations

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 killing of a member of an endangered species due to the use of gas cartridges may result in a fine and/or imprisonment under the Endangered Species Act. All users of this product must determine whether endangered species are known to occur or might occur in the intended use areas. Consult the nearest U.S. Fish and Wildlife Service regional office or the appropriate State agency for current information on habitats occupied by endangered species.

SPECIFIC CONSIDERATIONS

Use this product according to these instructions to protect endangered species.

Black-Footed Ferret (*Mustella nigripes*): To limit risks to the black-footed ferret and to avoid destruction of its prey base, do not use this product within 4.3 miles (7 kilometers) of any prairie dog town unless the colony is an isolated black-tailed prairie dog town less than 80 acres in size or an isolated white-tailed or Gunnison prairie dog town less than 200 acres in size, or unless the town has been appropriately surveyed, using methods acceptable to the U.S. Fish and Wildlife Service, and found not to contain black-footed ferrets and found by the FWS not to be suitable site ferret reintroductions.

Use of this product within the occupied habitats of the organisms listed immediately below is limited to qualified individuals who have been trained to distinguish dens and burrows of target species from those of non-target species. Such individuals may be wildlife biologists, certified applicators, representatives of California state or Federal agencies, or agents of county agricultural offices or university extension offices.

Fresno kangaroo rat (*Dipodomys nitratooides exilis*) in Fresno and Merced Counties, California.

Giant kangaroo rat (*D. Ingens*) in Merced, Fresno, Kings, Tulare, Kern, San Luis Obispo, and Santa Barbara Counties, California.

Stephen's kangaroo rat (*D. Stephensii*) in Riverside, San Diego, and San Bernadino Counties, California.

Tipton kangaroo rat (*D.n.nitratooides*) in Kings, Tulare, Kern and Fresno Counties, California.

Point Arena mountain beaver (*Aplodontia rufa nigra*) in Mendocino County, California.

San Joaquin kit fox (*Vulpes macrotis mutica*) unless authorized by the U.S. Fish and Wildlife Service in Alameda, Contra Costa, Fresno, Kern, Kings, Merced, Monterey, San Benito, San Joaquin, San Luis Obispo, Santa Barbara, Santa Clara, Stanislaus, or Tulare Counties, California.

Desert Tortoise (*Fopherus agassizii*) in Arizona, southern California, southern Nevada, and southern Utah.

Do not use this product within the occupied habitats of the endangered animals listed immediately below.

Hualapal Mexican vole (*M. mexicanus hualpalensus*) in Mohave County, Arizona.

Morro Bay kangaroo rat (*D. heermanni morroensis*) in San Luis Obispo County, California.

Utah prairie dog (*Cynomys parvidens*) in Garfield, Iron, Kane, Piute, Sevier, and Wayne Counties, Utah.

Coachella Valley fringe-toed lizard (*Uma inornata*) in the Coachella Valley area of southern California.

Island night lizard (*Xantusia riversiana*) on Santa Barbara, San Clemente, and San Nicolas Islands, California.

Blunt-nosed leopard lizard (*Gambelia silus*): Do not use this product within the occupied habitat of the blunt-nosed leopard lizard in Fresno, Kern, Kings, Merced, Monterey, San Benito, San Luis Obispo, Santa Barbara, Santa Clara and Stanislaus Counties, California, from October 1 to April 15 unless a specific blunt-nosed lizard protection plan for this period is approved by the U.S. Fish and Wildlife Service and fully implemented. Use of this product in occupied habitat of this species from April 15 through September 30 is limited to daylight hours when air temperatures are 77-95°F (20-30°C).

San Francisco garter snake (*Thamnophis sirtalis tetrataenis*): Do not use this product within the occupied habitat of the San Francisco garter snake in San Mateo, San Francisco, Santa Clara, and Santa Cruz Counties, California from November 1 to March 30 unless a specific San Francisco garter snake protection program for this period is approved by the U.S. Fish and Wildlife Service and fully implemented. Use of this product in occupied habitat of this species under such approved programs or from April 1 through October 31 is limited to qualified individuals who have been trained to distinguish dens and burrows of target species from those of nontarget species. Such individuals may be wildlife biologists, certified applicators, representatives of California State or Federal agencies, or agents of county agricultural offices or university extension offices.

Eastern Indigo snake (*Drymarchon corais couperi*): Do not use this product within habitat types and locales known to support the Eastern Indigo snake throughout Florida and the coastal plain of Georgia.

Gopher tortoise (*Gopherus polyphemus*): Do not use this product in or adjacent to known gopher tortoise occupied habitat west of the Mobile and Tombigbee Rivers in Alabama.

DIRECTIONS FOR USE

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

USE RESTRICTIONS:

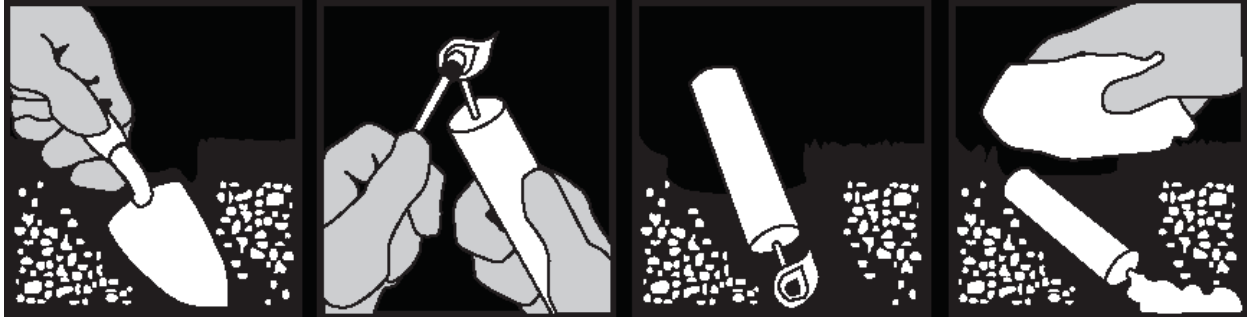
FOR OUTDOOR USE ONLY. This product may be used only to control woodchucks, pocket gophers, moles, Norway rats, skunks, and ground squirrels in non-crop areas (including residential lawns, parks, golf courses, reforested areas, open fields) and in rangeland. Do not use where use of gas cartridges is prohibited by local ordinances. Do not use under buildings, homes, porches or any structure due to possible fire hazard. Only use inside of burrows and never inside of buildings. Product effectiveness may be limited in dry or porous soil which permits the escape of toxic gases from treated burrow. Do not use on Woodchucks in California. Only for use on Norway rats and moles (excluding star-nosed mole) in North Carolina.

PRIOR TO APPLICATION:

Carefully observe areas to be treated. Apply cartridges only to burrow systems or dens currently being used by target species. Do not apply cartridges to burrows or dens known or believed to contain non-target vertebrate animals. Do not use cartridges where vegetation is dry and likely to catch fire.

APPLICATION STEPS:

1. Read and understand the specific directions for the type of animal that you intend to control.
2. Collect sufficient soil, rocks or other noncombustible materials to close burrow system after insertion of cartridge.
3. Make sure the burrow or den hole(s) are large enough for easy insertion of cartridge.
4. Position yourself so that you can light fuse and promptly insert cartridge into burrow. The minimum burn time is 5 seconds. Do not breathe cartridge smoke.
5. Prepare hole for treatment as specified below [on this label] for target animal control.
6. Insert fuse into cartridge, making sure at least two inches of fuse protrudes from the cartridge (minimum burn time 5 seconds). Working quickly, light fuse and insert cartridge into hole fuse-end first. Never light the cartridge directly [or with less than 2 inches of fuse] nor hold a burning cartridge in your hand. Cover hole immediately with rock or sod, taking care not to smother cartridge. Immediately cover all openings from which gas escape is visible.



NOTE: The effectiveness of this product will be limited under conditions of dry or porous soil which permit the escape of toxic gases from treated burrow.

FOLLOW THESE INSTRUCTIONS

*Not for use on Woodchucks in California

**Use in North Carolina on Norway rats and moles (excluding star-nosed mole) only.

MOLES: (lawns, golf courses, non-crop areas) — To locate the main runway, look for fresh conical mounds of dirt. Select the freshest of these, remove plug and dig in the direction of main runway. If lateral to the mound is plugged, either dig past the plug or probe ground around the plug to locate main runway. Main runway will be found when probe meets little or no resistance. Follow application steps illustrated above. Proceed to the next closest burrow and treat as above.

NORWAY RAT: (non-crop areas) Use only where burrows are isolated from homes, barns, and other man-made structures. DO NOT USE inside buildings or anywhere where gasses could enter buildings. Follow application steps shown above. Proceed to next closest burrow and treat as above.

GROUND SQUIRRELS: (rangeland) Follow application steps shown above. Proceed to next closest burrow and treat as above.

SKUNKS: (non-crop areas) Locate all entrances to den. Do not treat dens under inhabited structures or buildings where toxic gasses could reach humans, pets or domestic animals including livestock. Follow application steps shown above. For use in KANSAS wildlife permit required.

WOODCHUCKS*: (open fields, non-crop areas) - Locate all burrow entrances. Select one for use and close all other entrances with rock and dirt. Follow application steps shown above. Consult State game laws before using this product for woodchuck control.

POCKET GOPHERS: (meadows, reforested areas) - Locate a characteristic fan-shaped mound with signs of recent gopher activity (e.g., recently excavated soil) at plugged burrow entrances. Determine if burrow is active by removing soil plug from center of each burrow entrance. Return the next day to see if the burrow opening has been re-plugged, indicating active use by a pocket gopher. DO NOT treat burrows that remain unplugged. Find the horseshoe-shaped depression on one side of the plugged mound. Locate the main runway by probing the ground 15-18" (38-46cm) from the mound, starting on the same side as the depression. The main runway has been located when friction on the probe is released and it falls into the runway. Using a shovel or trowel, dig down to the main runway, taking care not to block it with soil, to create a hole. Follow application steps shown above. Treat all active mounds. One cartridge placed in the

end of a runway should be sufficient. One or more additional cartridges should be used if treatment takes place in the middle of runway or if runway is "T-shaped" to reach pocket gophers that may be on the untreated side of the plugged runway. Re-treat in 5-7 days if new or residual activity appears.

For larger animals, longer or multiple runways, use more than one cartridge. Proceed to the next runway, burrow or den entrance and treat as above.

[CARTRIDGE LABEL]

Revenge Rodent Smoke Bomb

WARNING: Keep Out of Reach of Children. After ignition, cartridge produces toxic gasses (such as oxides of sulfur and carbon monoxide). Fumes may be harmful if inhaled.

Net Weight 1 oz. [each cartridge]

IMPORTANT: SEE PRECAUTIONARY STATEMENTS ON BACK OF PACKAGE AND ON INSERT AND FOLLOW ENTIRE DIRECTIONS FOR USE BEFORE USING.

ACTIVE INGREDIENTS:

Sulfur-----39.4%

Potassium Nitrate-----38.8%

Charcoal Carbon-----9.3%

OTHER INGREDIENTS:-----12.5%

TOTAL:-----100.0%

Minimum Fuse Burn Time: 5 seconds

[Insert batch code]