



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 10, 2021

April R. Vingum
Registration Specialist
Dept. of Regulatory Affairs
Bell Laboratories, Inc./Motomco
3699 Kinsman Blvd
Madison, WI 53704

Subject: Amendment to add a supplemental label in support of USDA APHIS, USAF, USFWS, and Island Conservation efforts to eradicate the invasive Polynesian rat (*Rattus exulans*) from Wake Atoll.
Product Name: ZP® Tracking Powder
EPA Registration Number: 12455-16
Application Date: July 30, 2021
Decision Number: 578036

Dear April Vingum:

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 is only for a supplemental label that is an addendum to the master label. 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.

This supplemental labeling contains some new and/or revised uses and/or directions which may be additional to the uses and/or directions found on the label on or attached to the container, but this supplemental labeling does not by itself constitute the complete set of use directions. The complete set of use directions is set forth on the container label as combined with this supplemental labeling.

To allow for the successful restoration of the island's ecosystem and nest habitat for various seabird species, all invasive Polynesian rats must be killed. To achieve this goal, the eradication program involves multiple application methods, including bait trays, structural voids baiting and hand baiting. These application methods will consequently result in accessibility of bait to nontarget species. However, many of the nontarget species will be at their lowest numbers during the time of application and the benefits of the long-term goals of protecting and restoring native

ecosystems and species by removing invasive Polynesian rats is believed to be justified and to outweigh these potential risks.

A stamped copy of your labeling is enclosed for your records. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling.

Your release for shipment of the product constitutes acceptance of these conditions. **This supplemental label will expire on December 31, 2026.** A monitoring plan must be submitted to the Agency that includes the monitoring actions prior to, during, and after the implementation of eradication within one year of completion of the eradication project. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Ralph Narain by phone at 202-566-2853, or via email at Narain.Ralph@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'VE', followed by a horizontal line extending to the right.

Venus Eagle, Product Manager 01
Invertebrate and Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure: Stamped supplemental label

RESTRICTED USE PESTICIDE

DUE TO ACUTE ORAL, ACUTE DERMAL, AND PRIMARY DERMAL IRRITATION TOXICITY.

For retail sale only to employees of federal agencies conducting rodent control or eradication for conservation purposes, or persons working under their authority, and to be used only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

SUPPLEMENTAL LABELING

For control and eradication of Polynesian rats on Wake Atoll.

ZP[®] TRACKING POWDER

EPA Reg. No. 12455-16

This supplemental label is only for use on Wake Atoll and expires on December 31, 2026.

ACTIVE INGREDIENT:

Zinc Phosphide (CAS # 1314-84-7) 10%

OTHER INGREDIENTS: 90%

TOTAL: 100%

KEEP OUT OF REACH OF CHILDREN

**DANGER- PELIGRO
POISON**

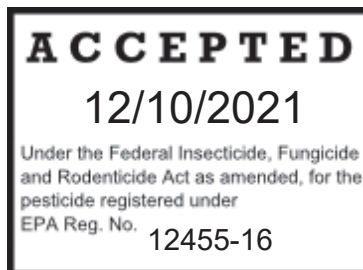


Manufactured By:
Bell Laboratories, Inc.
3699 Kinsman Blvd.
Madison, WI 53704

Net Contents: 1.1 lb. to 25 lb.

Batch Code: _____

EPA EST. NO. 12455-WI-1^k
EPA EST. NO. 12455-WI-2^p
EPA EST. NO. 12455-WI-3^w
[superscript is first letter of the lot number]



FIRST AID

If Swallowed:	<ul style="list-style-type: none">• Call a poison control center, doctor, or 1-877-854-2494 immediately for treatment advice, or transport the person to the nearest hospital.• DO NOT DRINK WATER.• Do not administer anything by mouth or 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 1-877-854-2494 immediately for treatment advice.
If Inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.• Call a poison control center, doctor, or 1-877-854-2494 immediately for treatment advice.

HAVE LABEL WHEN OBTAINING TREATMENT ADVICE

NOTE TO PHYSICIAN OR VETERINARIAN

Contains the phosphine-producing active, Zinc Phosphide. Probable mucosal damage may contraindicate the use of gastric lavage. For animals ingesting bait and/or showing poisoning signs, induce vomiting by using hydrogen peroxide. Sodium bicarbonate can be given orally to neutralize the stomach acidity. The stomach and intestinal tract can be evacuated, oxygen administered, and cardiac and circulatory stimulants given.

TREATMENT FOR PET POISONING

If an animal eats this bait, call a veterinarian, or **1-877-854-2494** at once.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Fatal if swallowed. Fatal if absorbed through the skin. Causes skin burns. Harmful if inhaled. Do not get in eyes, on skin, or on clothing. Avoid breathing dust.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Coveralls, long-sleeved shirt, and long pants
- Chemical-resistant shoes plus socks
- Waterproof gloves
- When mixing and loading, wear a chemical-resistant apron
- When cleaning equipment, wear a chemical-resistant apron

Any person who retrieves carcasses or unused product following application of this product must wear:

- Waterproof gloves

USER SAFETY REQUIREMENTS

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing them.

USER SAFETY RECOMMENDATIONS

- Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing them. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to birds, fish, and other wildlife. Dogs, cats, and other animals might be poisoned if they feed upon animals that have eaten this bait. Do not contaminate water when disposing of equipment wash water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. A copy of this supplemental labeling and the container labeling for ZP® TRACKING POWDER (EPA Reg. No. 12455-16) must be in the possession of the user at the time of application.

READ THIS LABEL: Read this supplemental label and the container label for ZP® TRACKING POWDER (EPA Reg. No. 12455-16) before applying this product.

This product must be used strictly in accordance with this label's precautionary statements and use directions, as well as with all applicable state and federal laws and regulations. Use of ZP® TRACKING POWDER (EPA Reg. No. 12455-16) according to this labeling is subject to the use precautions and limitations imposed by the label affixed to the container for ZP® TRACKING POWDER (EPA Reg. No. 12455-16).

USE RESTRICTIONS

- This supplemental label applies only to the control and eradication of Polynesian rats (*Rattus exulans*) on Wake Atoll. All modifications to ZP® TRACKING POWDER contained in this supplemental label apply only to this eradication effort.
- If rats (or rat sign) are found following commencement of the first bait application, additional small-scale use is permitted up to twelve [12] months following commencement of the first bait application and only in the area where the rat or rat sign was found, in an effort to eliminate the few remaining survivors.
- Do not apply this product in a way that will contact workers or other persons, either directly or through drift.
- Only protected handlers may be in the area during application.
- Keep all other persons out of the treated area during application.
- Do not apply by any method, to any pest, or to any site not specified on this label.
- Apply only in locations inaccessible to children, pets, or domestic animals.
- Do not place this product near or inside ventilation duct openings.
- Do not apply this product along walls, in corners, or in open floor area of rooms in which food is handled or stored.
- Do not apply ZP® TRACKING POWDER in areas where there is a possibility of contaminating drinking water, food, or food handling equipment, or surfaces that come in direct contact with food.

APPLICATION DIRECTIONS

Find dry, acid-free areas where rats will likely pick up ZP® TRACKING POWDER on their feet or fur. Generally, these areas are along walls, by gnawed openings, in corners and concealed places, in places between floors and walls, and in structural voids and spaces. This product may also be used in outdoor, non-crop use areas along likely rat paths of movement. Obstacles may be positioned to create constricted areas along likely rat paths of movement.

Using a spoon or similar utensil, evenly sprinkle 3 to 6 grams by lightly shaking one to two level teaspoons of ZP® TRACKING POWDER in approximately 3-inch by 24-inch patches on dry ground or within flat-bottomed trays.

Using a hand-powered duster, dust into structural voids and spaces.

Maintain treatments for 7 days or for as long as rat activity is evident in the area, but no longer than twelve [12] months following the primary broadcast application.

POSTTREATMENT CLEAN-UP

For all methods of baiting, monitor the baited area periodically for carcasses during and after the operation as able. If practical, collect carcasses of target and non-target animals using waterproof gloves. Dispose of carcasses in accordance with federal, state, and local regulations.

Using waterproof gloves, collect and dispose of any powder or bait trays that is accessible and retrievable at the end of control or eradication operations as specified under **STORAGE AND DISPOSAL**.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store only in original closed container in a cool, dry place inaccessible children and pets. Keep containers closed and away from other chemicals.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be place in trash or delivered to an approved waste disposal facility.

CONTAINER HANDLING: *Nonrefillable container.* Do not reuse or refill this container.

[Plastic:] Offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill.

[Paper:] Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration.

NOTICE: To the extent consistent with applicable law, buyer assumes all risks of use, storage, or handling of the material not in strict accordance with directions given herewith. The efficacy of the product may be reduced under high moisture conditions.