

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

March 22, 2004

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Bell Laboratories Inc.  
3699 Kinsman Boulevard  
Madison, WI 53704

Attention: Mr. Craig A. Riekema

Subject: ZP® Rodent Bait AG  
EPA Reg. No. 12455-17  
Your amended application of September 19, 2003

**Purpose** The purpose of this submission is to revise your label in accordance with PR Notice 2001 and make other labeling changes.

**Label review** The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product.

1. Revise your "PRECAUTIONARY STATEMENTS" according to Enclosure 1.
2. Consider changing "PESTICIDE STORAGE" to "STORAGE".

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

**Existing stocks** Stocks of existing labels may be used for eighteen (18) months.

**Consequence for non-compliance** 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 constitutes acceptance of these conditions.

**Questions** If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or [peacock.dan@epa.gov](mailto:peacock.dan@epa.gov) (by E-Mail)

Sincerely yours,



Daniel B. Peacock, Biologist  
Insecticide-Rodenticide Branch  
Registration Division (7504C)

- Enclosures**
1. Precautionary Text for EPA Reg. No. 12455-17
  2. Stamped label

**Letter** Dan Peacock, Disk136,E:\Dan's Office Work\Disk 136\Zinc Phosphide\12455-17, revised label, 1-21-2004.wpd

Enclosure 1. Suggested Precautionary Text for EPA Reg. No. 12455-17

<b>FIRST AID</b>	
<p>Have label with you when obtaining treatment advice, including 1-877-854-2494.</p> <p>Any persons applying zinc phosphide products and experiencing signs and symptoms such as nausea, abdominal pain, tightness in the chest, or weakness, should be seen by a physician immediately.</p>	
If swallowed	<ul style="list-style-type: none"> <li>•Call a poison control center or doctor immediately for treatment advice or transport the patient to the nearest hospital.</li> <li>•Do not drink water.</li> <li>•Do not administer anything by mouth or induce vomiting unless told to do so by the poison control center or doctor.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>•Take off contaminated clothing.</li> <li>•Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>•Call a poison control center or doctor immediately for treatment advice.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>•Move person to fresh air.</li> <li>•If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>•Call a poison control center or doctor immediately for treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>•Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>•Call a poison control center or doctor immediately for treatment advice.</li> </ul>

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

Keep away from humans, domestic animals and pets. Harmful if swallowed, absorbed through the skin, inhaled, or in eyes. Do not breathe dust. Avoid contamination of feed or foodstuffs. Avoid contact with acids. Wash all utensils, spoons, or measuring devices thoroughly after using.

**Personal Protective Equipment (PPE)**

All handlers, including anyone who applies bait and retrieves carcasses and unused bait, must wear waterproof gloves.

Follow manufacturer's instructions for cleaning/maintaining PPE, such as gloves. If no instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet.

**Environmental Hazards**

This product ... high water mark.

**RESTRICTED USE PESTICIDE**  
**DUE TO HAZARDS TO NONTARGET SPECIES**  
For retail sale and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.

**ZP<sup>®</sup>**  
**RODENT BAIT**  
**AG**

FOR CONTROL OF GROUND SQUIRRELS, PRAIRIE DOGS, RATS, VOLES, MICE, MEADOW MICE, DEER MICE, KANGAROO RATS, AND GOPHERS.

ACTIVE INGREDIENT:		<b>ACCEPTED</b>
Zinc Phosphide (CAS #1314-84-7) .....	2%	with <b>COMMENTS</b>
INERT INGREDIENTS:.....	98%	in EPA Letter Dated:
		MAR 22 2004
TOTAL	100%	

Under the Federal Insecticide, Fungicide, and Rodenticide Act

**KEEP OUT OF REACH OF CHILDREN** for the pesticide registered under EPA Reg. No.

12455-17

**CAUTION**  
**FIRST AID**

**HAVE LABEL WITH YOU WHEN OBTAINING TREATMENT ADVICE**

Any persons applying zinc phosphide products and experiencing symptoms such as nausea, abdominal pain, tightness in the chest, or weakness, should be seen by a physician immediately.

**IF SWALLOWED:**

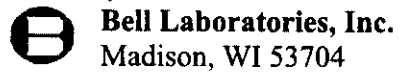
- Call a poison control center, doctor, or 1-877-854-2494 immediately for treatment advice.
- Do not drink water.
- Do not induce vomiting unless told to do so by the poison control center or doctor.

**IF ON SKIN:**

- Wash with plenty of soap and water.

**NET WEIGHT: 50 lbs. (22.72 kilos)**

Manufactured by:



EPA EST. NO. 12455-WI-1 EPA REG. NO. 12455-17

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION**

Harmful if swallowed. Wash thoroughly with soap and water after handling.

**ENVIRONMENTAL HAZARDS**

This product is toxic to wildlife and fish. Birds and other wildlife feeding on treated bait may be killed. Do not apply where runoff is likely to occur. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes.

**ENDANGERED SPECIES CONSIDERATIONS**

Whooping Crane (Grus americana). Do not use this product during the period 30 days prior to arrival and 30 days after the whooping crane leaves known crane habitat.

**UTAH:** Utah Prairie Dog (Cynomys parviden). Do not use this product in the range of the Utah Prairie Dog.

**CALIFORNIA:** 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 near or adjacent to San Pablo Bay and San Francisco Bay. Do not use this product within 1/2 mile of salt marsh vegetation and/or brackish water wetlands which are located in the Sacramento River below or adjacent to the confluence of the Sacramento River and the San Joaquin River.

Morro Bay Kangaroo Rats (Diposomys hurmani morroensis). Do not use this product within 2 1/2 miles of Bay Wood Park which is located on Morro Bay.

Aleutian Canada Goose (Branta canadensis leucoparia). Do not use this product from October to March in the Federally closed goose hunting areas in the State of California. See current Duck and Goose Hunting game laws for a current map.

**TEXAS:** Attwater's greater prairie chicken (Tympanuchus cupido attwateri). Do not use this product in the present occupied range of the Attwater's prairie chicken in the following Texas counties: Arkansas, Austin, Brazoria, Colorado, DeWitt, Fort Bend, Galveston, Goliad, Harris, Refugio, Victoria, Waller and Wharton.

**PUERTO RICO:** Yellow-shouldered Black Bird (Agelaius xanthomus) and Puerto Rican Plain Pigeon (Columba inornata wetmorei). This product must not be used in the following areas except in tamper proof bait boxes (within 10 kilometers of Central Aquirre, Lago Cidra, Ceiba, San German; 15 kilometers of La Esperanza, south of Highway 2 from city of Mayaguez to the city of Ponce and all Mona Island).

**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 use of this product may pose a hazard to Federally designated endangered/threatened species. Suggested measures to protect endangered species in your county may exist in an EPA "Interim Measures" pamphlet. You may call EPA's Endangered Species Hotline, 1-800-447-3813, to find out if an "Interim Measures" pamphlet exists for your county and have one sent to you. You can also consult your local county extension office or pesticide state lead agency to determine whether they have imposed any requirements in your area to protect endangered and threatened species.

## DIRECTIONS FOR USE

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

### NONCROP RIGHTS-OF-WAY

**USE RESTRICTIONS:** For control of California Ground Squirrels (Spermophilus beecheyi) on noncrop rights-of-way adjacent to canal and ditch banks and other noncrop borders during late spring and summer. ZP RODENT BAIT AG must not be applied on roads, near residential areas, over water or where plants are grown for food or feed.

**Prebaiting** with 6 pounds of untreated cracked corn per acre, 2-3 days prior to applying toxic bait may enhance acceptance by target species when baiting with acute toxicants.

**BAITING:** Treat only once during treatment period. Broadcast bait in a 10-15 foot swath along right-of-way, using hand or ground-driven dispensing devices not to exceed 6 pounds per acre. Bait will be applied only to the canal right-of-way between the base of the levee and adjacent properties. The canal and levee will not be treated. Dispose of excess bait from application equipment by burial.

### RANGELAND

**USE RESTRICTIONS:** For control of prairie dogs Blacktailed (Cynomys ludovicianus), Whitetailed (C. leucurus) and Gunnison (Zuni) on rangeland in Western United States (North Dakota, Nebraska, Kansas, Oklahoma, Texas, New Mexico, Arizona, Colorado, Montana, Utah and Wyoming).

**PREBAITING:** Prebait with 4 grams (one teaspoon) of untreated cracked corn per mound, one or two days prior to baiting, to increase acceptance of treated baits by prairie dogs.

**BAITING:** Apply bait only after all or most of prebait is eaten and only to areas where untreated bait was consumed. Establish observation period during prebaiting. Apply bait by hand as a six-inch bait spot on edge of each mound or in adjacent feeding areas. Application rate should not exceed 4 grams (one teaspoon) per bait spot. Treat during late summer or fall period (July-December). Do not apply more than one bait application during this period. Dispose of spilled or unwanted bait by burial.

### MACADAMIA NUT ORCHARDS AND ADJACENT NONCROP AREAS

**USE RESTRICTIONS:** For control of roof rats (R. rattus) in Macadamia Nut orchards.

**SPOT TREATMENT:** Bait may be placed in bait stations on the ground or in stations in trees. Place 4-8 grams (1-2 teaspoons) of bait in stations at the base of each tree and in each station in trees. Uneaten bait must be removed from trees prior to shaker harvest or from ground prior to mechanized harvest. Orchards may be treated up to 30 days prior to a harvesting round.

**BURROW TREATMENT:** Place 4-8 grams (1-2 teaspoons) of bait in each burrow. No preharvest interval is required, provided nuts are not retrieved from burrows.

**BROADCAST BAITING:** Broadcast at the rate of five (5) pounds of bait per acre in orchard using a ground device or by hand. Aircraft may be used to treat adjacent noncrop areas if recommended and supervised by the Hawaii Dept. of Health. The number of applications shall not exceed four (4) per year. The total amount of bait applied shall not exceed 20 pounds per acre per year.

### ORCHARDS AND GROVES

**USE RESTRICTIONS:** For control of meadow voles, prairie voles, pine voles, California voles, long-tailed voles, Oregon voles, mountain voles and Townsend's voles (Microtus spp.) in orchards and groves. Apply bait after harvest while the orchard or grove is in a nonbearing phase.

**HAND BAITING:** Near the base of each infested tree, place teaspoonful quantities of bait at 2-4 locations, either on surface trails or at the mouth of holes leading to underground burrow systems. Cover bait artificially (e.g., mats, boards) or by pulling overhanging grass back into place. Do not allow bait to be exposed on bare ground. Do not disturb the runway system. Bait at the rate of 2-3 pounds per acre of infested trees.

**TRAILBUILDER:** Drop teaspoonful quantity of bait at 4-5 foot intervals in the artificial trail made by the machine just inside the drop line on both sides of the trees. Apply at the rate of 2-3 pounds per acre.

**BROADCAST BAITING:** Under infested trees broadcast evenly by cyclone seeder or by hand (wear rubber gloves during hand broadcast operations). Concentrate in areas with the heaviest vegetative cover. Do not broadcast on bare ground or growing crops. Apply at the rate of 6-10 pounds per acre.

**AERIAL APPLICATION:** Broadcast bait at a rate of 6-10 pounds per acre. Do not apply on bare ground or growing crops.

### SUGARCANE

**USE RESTRICTIONS:** For control of Polynesian (Rattus exulans), Norway (R. norvegicus), Roof (R. rattus), Rice (Oryzomys palustris), Florida water (Neofiber alleri), and Cotton rats (Sigmodon hispidus) in sugarcane fields.

**PREBAITING:** Prebaiting with three pounds of untreated cracked corn per acre one or two weeks prior to baiting is usually desirable to enhance acceptance of the treated bait by rats.

**BAITING:** Broadcast bait aircraft, ground-driven devices, or by hand at the rate of five (5) pounds of bait per acre. The number of applications shall not exceed four (4) per crop. The total application shall not exceed 20 pounds per acre. Do not apply within 30 days of harvest.

### NURSERY STOCK, CONIFER/CHRISTMAS TREE, POPLAR/COTTONWOOD, ORNAMENTAL AND NON-BEARING FRUIT TREES

**USE RESTRICTIONS:** For control of meadow voles, prairie voles, pine voles, California voles, long-tailed voles, Oregon voles, mountain voles and Townsend's voles (Microtus spp.) in nursery stock, conifer/Christmas tree, poplar/cottonwood, ornamental, and non-bearing fruit trees.

**BROADCASTING BAITING:** Under infested nursery stock, conifer/Christmas trees, poplar/cottonwood trees, ornamental and/or non-bearing fruit trees broadcast evenly by cyclone seeder or by hand. Concentrate in areas with the heaviest vegetative cover. Do not broadcast on bare ground. Apply at a rate of 6-10 pounds per acre.

**HAND BAITING:** Near the base of infested nursery stock, conifer/Christmas trees, poplar/cottonwood trees, ornamental and/or non-bearing fruit trees, place teaspoonful quantities of bait at 2-4 locations, either on surface trails or at the mouth of holes leading

to underground burrow systems. Do not allow bait to be exposed on bare ground. Do not disturb the runway system. Bait at a rate of 2-3 pounds per acre of infested stock.

**GRAPE VINEYARDS**

**USE RESTRICTIONS:** For control of deer mice, white-footed mice, and oldfield mice (Peromyscus spp.), meadow voles (Microtus pennsylvanicus), and meadow jumping mice (Zapus hudsonicus) in grape vineyards. Do not use this product in areas of Alabama and Florida occupied by endangered subspecies of the oldfield mouse.

**BROADCAST BAITING:** Broadcast bait evenly on the ground between the rows by cyclone seeder or by hand. Apply bait at a rate of 6-10 pounds per acre. Do not apply by air.

**ALFALFA, LAWNS, GOLF COURSES, AND OTHER NONCROP AREAS**

**USE RESTRICTIONS:** For control of plains pocket gophers (Geomys bursarius), southeastern pocket gophers (G. pinetis), yellow-faced pocket gophers (Pappogeomys castanops) and pocket gophers (Thomomys spp.), in alfalfa, rangelands, croplands, noncrop areas, lawns, golf courses, parks, forests, and reforestation areas, conifer/Christmas trees, and poplar/cottonwood plantations. Bait must be applied directly into pocket gopher's underground burrow systems. Do not apply bait above ground or directly to crops grown for food or feed. Do not apply by use of burrow-builders in lawns, golf courses, or municipal parks.

**HAND BAITING:** Place one teaspoon (4 grams) of bait at 2-4 locations using a mechanical probe or similar device into the underground runway. After bait is dropped into the probe hole, cover the hole. Pick up and bury all spilled bait.

**BURROW BUILDER:** Drop teaspoonful quantity of bait at 4-5 foot intervals in the artificial burrow made by the machine. Apply at a rate of 2-3 pounds per acre. Pick up and bury all spilled bait.

**RANGELANDS AND NONCROP AREAS**

**USE RESTRICTIONS:** For control of the Ord's Kangaroo rat (Dipodomys ordii), banner-tailed kangaroo rat (Dipodomys spectabilis), and Merriam's kangaroo rat (Dipodomys merriami) in rangeland vegetation and noncrop areas.

**HAND BAITING:** Place one tablespoon (12 grams) of bait at 2 locations on opposite sides of mounds. Attempt to place in feeding runs near the entrance to burrows.

**HAND BAITING IN NONCROP AREAS:**

**Such as Lawns, Ornamentals, Golf Courses, Parks and Nurseries**

**USE RESTRICTIONS:** For control of meadow voles, prairie voles, pine voles, California voles, long-tailed voles, Oregon voles, mountain voles and Townsend's voles (Microtus spp.), Thirteen-lined ground squirrels (Spermophilus tridecemlineatus), and California ground squirrels (Spermophilus beecheyi). ZP RODENT BAIT AG must not be applied on roads, over water or where plants are grown for food or feed.

**PREBAITING** with 6 pounds of untreated cracked corn per acre, 2-3 days prior to applying toxic bait has been shown to provide more consistent acceptance by target species when baiting with acute toxicants.



**HAND BAITING:** Place 4 grams (one teaspoon) of bait around each active burrow or runway, allow bait to fall through grass to ground surface but do not apply to bare ground. Do not place bait in heaps or piles.

**STORAGE AND DISPOSAL**

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

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

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product placed in trash or delivered to an appropriate waste disposal facility.

**CONTAINER DISPOSAL:** Do not reuse empty container. Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Call your local waste agency for any questions on proper disposal.

**WARRANTY:** Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

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