12455-17

05/04/2005

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

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

May 4, 2005

505 5-778437

Bell Laboratories Inc. 3699 Kinsman Boulevard Madison, WI 53704

Attention: Mr. Craig A. Riekena

Subject: ZP® Rodent Bait AG EPA Reg. No. 12455-17 Our May 22 and September 30, 2004, letters Your letter of December 9, 2004 and E-Mail of April 12, 2005

PurposeThe purpose of this submission is to revise your label in accordance with our last
letters and to add new sites and pests to your label..

- Label The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) will be acceptable, provided you submit one (1) copy of final printed labeling to us, with the following change, before you ship your product:
 - 1. On the Front Panel, delete "For spot treatment ... at time of planting." This level of detail is not needed on the Front Panel.
 - 2. Revise your **"PRECAUTIONARY STATEMENTS**" according to Enclosure 1, which we first mentioned in our May 22, 2004, letter...
 - 3. Under "DIRECTIONS FOR USE", add the following sentence as a 2nd Sentence after "READ THIS LABEL:"

Do not apply to any site, against any pest, or by any method of applicable not stated on this label.

Page 2 of 3				
Label- continued	 Change RANGELAND AND NONCROP AREAS" to "RANGELAND AND ADJACENT NONCROP AREAS" in the heading for prairie dogs. 			
	 Under "ORCHARDS AND GROVES", use the text approved March 22, 2004, for "HAND BAITING" and "TRAILBUILDER". Delete the "BAIT PLACEMENT STATION" section. 			
	6. The heading on Page 6 at the bottom of the page must read:			
	TIMOTHY AND TIMOTHY/ALFALFA MIXTURES PRODUCED FOR HAY			
	 Add this sentence at the end of the "USE RESTRICTIONS" of the section entitled, TIMOTHY AND TIMOTHY/ALFALFA MIXTURES PRODUCED FOR HAY: 			
	Do not apply to timothy or timothy/alfalfa mixtures within 60 days of harvest.			
	8. Delete the section titled "IN AND AROUND BUILDINGS" because these uses involve public health pests, for which your company has never submitted efficacy data for this formula.			
	9. You need non-homeowner "Storage and Disposal" statements for this product.			
Existing stocks	Stocks of products with existing approved labels may be used for eighteen (18) months.			
Consequence for non- compliance	If this condition is 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 this condition.			
Questions	If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or <u>peacock.dan@epa.gov</u> (by E-Mail).			
	Sincerely yours,			
	DBP			
	Daniel B. Peacock, Biologist			
	Insecticide-Rodenticide Branch			
	Registration Division (7504C)			

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Enclosures1. Suggested Precautionary Text for EPA Reg. No. 12455-172. Stamped label with comments

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Page 3 of 3

Letter Dan Peacock, USB Flash Drive 1, E:\1-7-2005 Backup\Dan's Office Work\A Flash Drive 1\Zinc Phosphide\12455-17, revised label, 5-4-2005.wpd

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

FIRST AID				
Have label with you when obtaining treatment advice, including 1-877-854-2494.				
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.				
If swallowed	 Call a poison control center or doctor immediately for treatment advice or transport the patient 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	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor immediately for treatment advice. 			
If inhaled	 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 or doctor immediately for treatment advice. 			
If in eyes	 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 or doctor immediately for treatment advice. 			

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 form other laundry. Wash hands throughly 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® *RODENT BAIT* **AG**

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

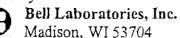
For spot treatment in and around buildings, around burrows, in orchards, vineyards and sugarcane fields and on rangeland and noncrop areas. For Broadcasting by ground spreader or aircraft in orchards, sugarcane fields and/or noncrop areas. For Ground Broadcasting in vineyards, in bushberries and in caneberries. For Broadcast use in California, Idaho, Oregon and Washington by ground spreader or aircraft in alfalfa. For Ground Broadcast use in Idaho, Oregon and Washington in timothy and timothy mixtures. For Broadcasting by ground spreader or aircraft in Idaho, Oregon, and Washington in barley, potatoes, sugar beets and wheat. For Ground Broadcasting in Idaho, Oregon and Washington in dry beans. For use in reduced tillage and no-till corn and in cucurbits at time of planting.

ACTIVE INGREDIENT:	with COMMENTS in EPA Letter Dated:						
Zinc Phosphide (CAS #1314-84-7)							
INERT INGREDIENTS:							
TOTAL	100% Under the Federal Insecticide, Fungicide, and Rodemiside Act						
KEEP OUT OF REACH OF CHIPPEd Nor the pesticide registered under EPA Reg. No. 124 55-17							
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 1-8 advice.	77-854-2494 immediately for treatment						
• 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:

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

Pygmy rabbit (Brachylagus idahoensis). To not use this product within one mile of alfalfa fields.

UTAH: Utah Prairie Dog (<u>Cynomys parviden</u>). Do not use this product in the range of the Utah Prairie Dog.

CALIFORNIA: Salt marsh harvest mouse (<u>Reithrodontomys ravirentris</u>). 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 (<u>Diposomys hurmani morroensis</u>). 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.

Giant Kangaroo Rat (<u>Dipodomys ingens</u>). Follow the Interim measures for Protecting Endangered Species in the California Endangered Species Bulletin for the following California counties: Fresno, Kern, Kings, Merced, Monterey, San Benito, San Luis Obispo, Santa Barbara and Tulare.

Tipton Kangaroo Rat (<u>Dipodomys nitratoides nitratoides</u>). Follow the Interim Measures for Protecting Endangered Species in the California Endangered Species Bulletin for the following California counties: Kern, Kings and Tulare.

Fresno Kangaroo Rat (<u>Dipodniys nitraoides exilis</u>). Follow the Interim Measures for Protecting Endangered Species in the California Endangered Species Bulletin for the following California counties: Fresno, Kings, Madera and Merced.

Stephan's Kangaroo Rat (<u>Dipodomys stephens</u>). Follow the Interim Measures for Protecting Endangered Species in the California Endangered Species Bulletin for the following California counties: San Bernardino, San Diego and Riverside. San Bernardino Kangaroo Rat (<u>Dipodomys merriami parvus</u>). Follow the interim Measures for Protecting Endangered Species in the California Endangered Species Bulletin in the following California counties: San Bernardino and Riverside.

TEXAS: Attwater's greater prairie chicken (<u>Tympanuchus cupido attwateri</u>). 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 (<u>Agelaius xanthomus</u>) and Puerto Rican Plain Pigeon (<u>Columba inornata wetmorei</u>). 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.

READ THIS LABEL: Read this entire label and follow all use directions and use precautions.

Use Restrictions: 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 this application.

LIMITATIONS

The following Limitations apply to the Agricultural Areas listed on this label: Pellets must not be applied on roads, near residential areas, o rover water. Do not broadcast over growing crops others than alfalfa, barley beans (dry), potatoes, sugar beets, sugarcane and wheat. Apply pellets on warm clear days. Do not graze animals in treated areas.

NONCROP RIGHTS-OF-WAY

USE RESTRICTIONS: For control of California Ground Squirrels (<u>Spermophilus</u> <u>beecheyi</u>) 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 AND NONCROP AREAS

USE RESTRICTIONS: For control of prairie dogs Blacktailed (<u>Cynomys ludovicianus</u>), Whitetailed (<u>C. leucurus</u>) and Gunnison (<u>Zuni</u>) 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 (<u>R. rattus</u>) in Macadamia Nut orchards and adjacent noncrop areas.

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. Uncaten 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 (<u>Microtus spp.</u>) in orchards and groves. Apply bait after harvest while the orchard or grove is in a nonbearing phase.

BAIT PLACEMENT STATION: Place 2.5 ounces under at least two established stations per tree. These stations should be established 2-3 months prior to the baiting period by placing rectangular pieces (at least 15" x 15") of asphalt shingles, fiberboard rays, wood or metal at the tree dripline.

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.

SPOT OR 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 (<u>Rattus</u> <u>exulans</u>), Norway (<u>R</u>. <u>norvegicus</u>), Roof (<u>R. rattus</u>), Rice (<u>Oryzomys palustris</u>), Florida water (<u>Neofiber alleri</u>), and Cotton rats (<u>Sigmodon hispidus</u>) in sugarcane fields.

PREBAJTING: 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 by 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 TREE PLANTATIONS

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 plantations.

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, prairie and pine voles (<u>Microtus pennsylvanicus</u>) (<u>Microtus spp.</u>) and meadow jumping mice (<u>Zapus hudsoricus</u>) 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 (<u>Geomys bursarius</u>), southeastern pocket gophers (<u>G. pinetis</u>), yellow-faced pocket gophers (<u>Pappogeomys castanops</u>) and pocket gophers (<u>Thomomys spp.</u>), in alfalfa, rangelands, croplands, noncrop areas, lawns, golf courses, parks, forests, and reforestation areas, conifer/Christmas trees, and poplar/cottonwood plantations other and noncrop areas. 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.

<u>Locating Underground Runways:</u> Use a metal rod, a strong smooth stick or other suitable implement to probe the ground 10 to 15 inches away from fan-shaped gopher mounds. Begin probing on the flat side of the fat. When the main runway has been entered, the probe will drop about 2 inches due to decreased resistance from soil.

<u>Applying Bait to Runways</u>: Using a long-handled spoon or mechanical probe, drop one teaspoon of bait into the main runway at each baited point. Cover the opening with sode, a rock, or soil to exclude light. Take care not to cover bait with soil. Depending upon mound density, make two to five bait placements per burrow system. Recover and bury all spilled pellets.

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.

ALFALFA

USE RESTRICTIONS: For control of vole complex (<u>Microtus spp.</u>) complex in alfalfa. All applications must occur shortly after a cutting of the hay, and/or prior to the new growth attaining a length of 2 inches. Alfalfa forage from treated areas must not be harvested until it reaches maturity. This use is restricted to California, Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground driven dispensing devices. A maximum of 2 applications by air or ground may be made at the rate of 4 to 6 pounds per acre. The second application may not be made to the same field or to other areas of the same field within 30 days. Do not apply by air when wind velocity exceeds 10 mph. Do not apply in piles or permit piles to be formed by equipment.

TIMOTHY, TIMOTHY/ALFALFA AND TIMOTHY/CLOVER MIXTURES PRODUCED FOR HAY

USE RESTRICTIONS: For control of vole complex (<u>Microtus spp</u>) complex in timothy, timothy/alfalfa and timothy/clover mixtures. Do not apply by air. Do not apply to actively growing timothy or timothy/alfalfa or timothy/clover mixtures. This use is restricted to California, Idaho, Oregon and the state of Washington.

BROADCAST BAITING: Broadcast pellets using hand, cyclone seeder, or grounddrive dispensing devices. A maximum of 2 applications by ground may be made at the rate of 5 to 10 pounds per acre, one in the fall after the last cutting and one in the spring when timothy and timothy-legume mixtures are still dormant. Do not apply in piles or permit piles to be formed by equipment.

TIMOTHY PRODUCED FOR SEED

USE **RESTRICTIONS**: For control of vole complex (<u>Microtus spp</u>) complex in growing season. Do not apply by air. Do not apply to actively growing timothy or timothy/alfalfa or timothy/clover mixtures. A minimum of 158 days must pass between an application of zinc phosphide pellets and any livestock foraging activity. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by hand, cyclone seeder, or ground-driven dispensing devices at a rate of up to 10 lbs (0.2 lb active) per acre during crop dormancy. A maximum of 20 lbs (0.4 lb active) per acre may be applied annually.

BARLEY

USE RESTRICTIONS: For control of vole complex (<u>Microtus spp.</u>) complex in barley, or preplant. Do not apply this product to barley within 50 days of harvest. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground driven dispensing devices. Apply zinc phosphide pellets at a rate up to 6 lbs (0.12 lb active) per acre. Two applications may be made at a minimum interval of 25 days. A maximum of 12 lbs (0.24 lb active) per acre may be applied per year. All applications must be made prior to the boot stage.

POTATOES

USE RESTRICTIONS: For control of vole complex (<u>Microtus spp</u>.) complex in potatoes or pre-plant. Do not apply this product to potatoes within 30 days of harvest. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground driven dispensing devices. Apply zinc phosphide pellets at a rate up to 10 lbs (0.2 lb active) per acre, or two applications of zinc phosphide pellets at the rate of up to 5 lbs (0.1 lb active) per acre. The maximum application rate per year is 10 lbs (0.2 lb active).

SUGAR BEETS

USE RESTRICTIONS: For control of vole complex (<u>Microtus spp</u>.) complex in sugar beets or pre-plant. Do not apply this product to sugar beets within 30 days of harvest. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground driven dispensing devices. Apply zinc phosphide pellets at a rate of up to 10 lbs (0.2 lb active) per acre at planting. A second application may be made at this rate. The maximum application rate per year is 20 lbs (0.4 lb active).

WHEAT

USE RESTRICTIONS: For control of vole complex (<u>Microtus spp.</u>) complex in wheat or pre-plant. Do not apply this product to wheat within 50 days of harvest. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground driven dispensing devices. Apply zinc phosphide pellets at a rate up to 6 lbs (0.12 lb active) per acre. A second application may be made within 25 days. The maximum application rate per year is 12 lbs (0.24 lb active).

BEANS (DRY)

USE RESTRICTIONS: For control of prairie voles (<u>Microtus ochrogaster</u>), meadow voles (<u>M. pennsylvanicus</u>), house mice (<u>Mus musculus</u>); deer mice (<u>Peromyscus maniculatus</u>), white-footed mice (<u>P. leucopus</u>), thirteen-lined ground squirrels (<u>Spermophilus tridecemlineatus</u>), Ord's kangaroo rats (<u>Dipodomys ordii</u>), banner-tailed kangaroo rats (<u>D. spectabilis</u>), and Merriam's kangaroo rats (<u>D. merriami</u>) in dry beans growing season. Do not apply y air. Do not apply this product to dry beans within 30 days of harvest. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by hand or ground driven dispensing devices at a rate of 6 lbs (0.12 lb active) per acre. No more than oneapplication per growing season is permitted.

BUSHBERRIES and CANEBERRIES

USE RESTRICTIONS: For control of meadow, prairie and pine voles (Microtus spp.) in bushberries [blueberries (Highbush and lowbush), currant, elderberry, gooseberry and huckleberry] and in caneberries [blackberry, raspberry (black and red), loganberry, and cultivars or hybrids of these caneberries]. Only apply this product in the dormant season: after final harvest and not later than the beginning of leaf emergence in the spring. Do not apply when ground is snow covered. Do not apply by air. Minimum preharvest interval is 70 days.

BROADCAST BAITING: This product may be broadcast by cyclone seeder, or by hand. When applying by hand (wear rubber gloves during hand broadcast operations), throw tablespoon amounts into heavy cover along bushes, rock outcrops, and fence lines. Make up to 2 applications at a minimum interval of 21 days, at the rate of 6 to 10 pounds per acre per application.

CUCURBITS, REDUCED TILLAGE and NO-TILL CORN

USE RESTRICTIONS: For control of prairie voles (<u>Microtus ochrogaster</u>), meadow voles (<u>M. pennsylvanicus</u>), house mice (<u>Mus musculus</u>); deer mice (<u>Peromyscus maniculatus</u>) white-footed mice (<u>P. leucopus</u>), thirteen-lined ground squirrels (<u>Spermophilus tridecemlineatus</u>), Ord's kangaroo rats (<u>Dipodomys ordii</u>), banner-tailed kangaroo rats (<u>D. spectabilis</u>), Merriam's kangaroo rats (<u>D. merriami</u>), and cotton rats (<u>Sigmodon hispidus</u>) in cucurbits [includes chayote, Chinese wasgourd, citron melon, cucumber, gherkin, edible gourd, <u>Momordica spp.</u>, muskmelon, pumpkin, squash (summer and winter), and watermelon.] and in reduced tillage and no-till corn.

IN-FURROW APPLICATION ONLY: Do not broadcast. Only use equipment designed for In-Furrow delivery and properly adjusted to avoid crushing pellets into pieces too small to be effective. Make one application at planting, or pre-planting, at a rate of 4 to 6 pounds per acre. Collect excessive quantities of pellets deposited on surface soil or crop residues during equipment malfunction or spills.

CALIBRATION / ROW

Row spaces	4 Ibs/A Rate	5 lbs / A rate	6 lbs / A rate
Inches	oz. Per 1000 ft	oz. Per 1000 ft	oz. Per 1000 ft
20	2.5	3.1	3.7
30_	3.7	4.6	5.5
36	4.4	5.5	6.6
38	4.7	5.8	6.9

RANGELANDS AND NONCROP AREAS

USE RESTRICTIONS: For control of the Ord's Kangaroo rat (<u>Dipodomys ordii</u>), banner-tailed kangaroo rat (<u>Dipodomys spectabilis</u>), and Merriam's kangaroo rat (<u>Dipodomys merriami</u>) 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, <u>Oregon voles, mountain voles and Townsend's voles</u> (<u>Microtus spp.</u>), Columbian ground squirrels (S. columbianus), Richardson's ground squirrels (S. richardsonii), Thirteen-lined ground squirrels (<u>Spermophilus</u> <u>tridecemlineatus</u>), and California ground squirrels (<u>Spermophilus</u> <u>beecheyi</u>). 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.

IN AND AROUND BUILDINGS

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help to 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 nontarget wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and 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 lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
- 3. Dispose of product container, and unused, spoiled and unconsumed bait as specified on this label.

USE RESTRICTIONS: For control of Norway rats (<u>R</u>. <u>norvegicus</u>), Roof rats (<u>R</u>. <u>rattus</u>), and house mice (<u>Mus musculus</u>) in and around homes, industrial, agricultural 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 or mice will most likely find and consume the bait. Generally, these areas 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 seen. Protect bait from rain or snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

RATS: Apply 1 to 2 teaspoon amounts of bait per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days.

MICE: Apply 1 teaspoon amount of bait at 8-to 12-foot intervals. Maintain an uninterrupted supply of fresh bait for at least 15 days.

RATS AND MICE: 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. Do not treat the same area with product at less than 30-day intervals.

STORAGE AND DISPOSAL

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

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

DISPOSAL: If empty: do not reuse this container. Place in trash or offer for recycling if available. If partially filled: Place in trash or call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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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