

12455-18

9/30/2004

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 30, 2004

Bell Laboratories Inc.
3699 Kinsman Boulevard
Madison, WI 53704

Attention: Mr. Craig A. Riekema

Subject: ZP® Rodent Bait
EPA Reg. No. 12455-18 ✓
Gopha-Rid®
EPA Reg. No. 12455-30
ZP® Rodent Bait Place Pacs
EPA Reg. No. 12455-59
Mole & Gopher Bait
EPA Reg. No. 12455-85
Your letter of June 8, 2004

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17 - 768729

Purpose The purpose of these submissions is to revise your label in response to our last letter, including changes to your precautionary statements, based on data submitted to the Special Review and Reregistration Division (SRRD).

Data Since the data submitted to SRRD have not been evaluated, we are unable to consider changing your precautionary statements at the present time. Once they have been reviewed, then you could amend the affected registrations consistent with our review.

Label 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 (12455-18 and -30) or 2 (12455-59 and -85).

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 (by E-Mail).

Sincerely yours,



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

- Enclosures**
1. Precautionary Text for EPA Reg. No. 12455-18 and 30
 2. Precautionary Text for EPA Reg. No. 12455-59 and 85
 3. Stamped labels

Letter Dan Peacock, USB Flask Drive 1, E:\Dan's Office Work\A Flash Drive 1\Zinc Phosphide\12455-18, -30, -59, -85 revised labels, 9-30-2004.wpd

Enclosure 1. Suggested Precautionary Text for EPA Reg. No. 12455-18 and -30.

FIRST AID	
<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"> •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	<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 or doctor 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 or doctor immediately for treatment advice.
If 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 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. If bait is handled, wear gloves. Wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet. Avoid contamination of feed or foodstuffs. Avoid contact with acids. Wash all utensils, spoons, or measuring devices thoroughly after using.

Environmental Hazards

This product ... high water mark.

Enclosure 2. Suggested Precautionary Text for EPA Reg. No. 12455-59 and -85.

FIRST AID	
<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"> •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	<ul style="list-style-type: none"> •Wash with plenty of soap and water.
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 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. Do not breathe dust. Wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet. Avoid contamination of feed or foodstuffs. Avoid contact with acids. Wash all utensils, spoons, or measuring devices thoroughly after using.

Environmental Hazards

This product ... high water mark.

ZP[®]

Rodent Bait

KILLS RATS, MICE AND GOPHERS

ACTIVE INGREDIENT:

Zinc Phosphide (CAS #1314-84-7) 2%

INERT INGREDIENTS:..... 98%

TOTAL 100%

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEP 30 2004

FIRST AID

HAVE LABEL WITH YOU WHEN OBTAINING TREATMENT ADVICE 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.

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

12455-18

NOTE TO PHYSICIAN OR VETERINARIAN

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.

NET WEIGHT: 12 lbs. (5.4 kg)

Manufactured by:



Bell Laboratories, Inc.
Madison, WI 53704 U.S.A.

EPA REG. NO. 12455-18 EPA EST. NO. 12455-WI-1

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.

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Apply bait used to control rats and mice 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 by 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 bait stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hooved livestock, raccoons, bears, other potentially destructive animals, or in areas prone to vandalism.
3. Apply bait used to control pocket gophers directly into their underground tunnels.
4. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

RATS AND MICE

USE RESTRICTIONS: Use against the Norway rat, Roof rat and the House mouse in and around homes, industrial, agricultural and commercial buildings, and similar man-made structures. Do not place in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. When used in USDA-inspected facilities, this product must be applied in tamper-resistant bait stations.

SELECTION OF TREATMENT AREAS: After removing as much food, water and harborage as possible, determine dry, acid-free areas where rats and 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 rats and mice or their signs have been observed.

APPLICATION DIRECTIONS FOR RATS: Apply 1 to 2 teaspoon amounts of bait per placement. For outdoor use, place bait in active rat burrows or tamper-resistant bait stations. Maintain an uninterrupted supply of fresh bait until all signs of feeding have stopped. Do not treat the same area at less than 30 day intervals.

APPLICATION DIRECTIONS FOR MICE: Apply 1 teaspoon of bait per placement at 8 to 12 foot intervals. For outdoor use, place bait in tamper-resistant bait stations. Maintain an uninterrupted supply of fresh bait until all signs of feeding have stopped. Do not treat the same area at less than 30 day intervals. Collect and dispose of all dead animals and excess bait properly.

POCKET GOPHERS

USE RESTRICTIONS: Use against pocket gophers in rangeland and cropland (grain fields, forage crops, hay and alfalfa crops and vegetable crops). May also be used in forest areas, parks, nurseries, lawns, golf courses, around homes, and other noncrop areas. Only apply the bait underground. Collect and bury all dead animals found above the ground.

APPLICATION DIRECTIONS FOR POCKET GOPHERS: Use one of the following baiting methods for controlling pocket gophers.

PLUG REMOVAL BAITING: Burrowing pocket gophers (Thomomys spp. and Geomys spp.) throw out low, fan shaped mounds on either side of their underground tunnel. These lateral tunnels coming to the surface are on the flat side of the fan and are plugged with soil. Using a long-handled spoon, carefully remove the plug. Insert one teaspoon of bait as far down as possible. Reclose opening, being careful not to cover bait with soil.

MAIN RUNWAY BAITING: To locate main runways, probe about 6 to 8 inches away from mounds by use of an iron bar, a strong stick, or other suitable implement. Resistance on probe will drop suddenly and probe will fall about two inches when main runway is entered. Carefully enlarge the opening to accommodate insertion of the bait. Insert one teaspoon of bait into each active tunnel. Carefully close the hole with a stone, sod, or soil. Take care not to cover bait with soil.

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 fish, birds and other wildlife. 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.

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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