

03/22/2004

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 22, 2004

Bell Laboratories Inc.
3699 Kinsman Boulevard
Madison, WI 53704

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S-74689

Attention: Mr. Craig A. Riekema

Subject: 12455-24
EPA Reg. No. 12455-24
Your amended application of September 19, 2003

Purpose The purpose of these submissions is to revise your label in accordance with PR Notices 2001 and to make other minor 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. Change "For Formulating Use Only" to:

"A Rodenticide Only for Formulation into Registered Products for Use In and Around Structures and Inside Transport Vehicles; and on Terrestrial Nonfood, Rangeland, Macadamia Nut Orchards; Pome Fruits; Stone Fruits; Sugarcane; Nursery Stock, Conifer/Christmas Trees; Poplars/Cottonwoods; Ornamental and Non-Bearing Fruit Trees; Grape Vineyards; Alfalfa, Lawns, and Golf Courses".

The above list should include the sites of your end-use, zinc phosphide products.

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2. Under "1" in your "**DIRECTIONS FOR USE**", modify the text to reflect the above sites as follows:
 1. Uses In and Around Structures and Inside Transport Vehicles; and on Terrestrial Nonfood, Rangeland, Macadamia Nut Orchards; Pome Fruits; Stone Fruits; Sugarcane; Nursery Stock, Conifer/Christmas Trees; Populars/Cottonwoods; Ornamental and Non-Bearing Fruit Trees; Grape Vineyards; Alfalfa, Lawns, and Golf Courses;
3. Consider changing "**PESTICIDE STORAGE**" to "**STORAGE**".
4. Revise your precautionary text according to Enclosure 1. Place the "**DIRECTIONS FOR USE**" after the "**PRECAUTIONARY STATEMENTS**".
5. Delete the following sentence that normally appears on concentrated formulations of anticoagulants:

Exposure to this product during pregnancy should be avoided.

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.k@epa.gov (by E-Mail)

Sincerely yours,



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

Enclosures 1. Suggested Precautionary Text for EPA Reg. No. 12455-24
 2. Stamped label

Letter Dan Peacock, Disk136,A:\Zinc Phosphide\12455-24, revised label, 1-15-2004.wpd

Enclosure 1. Suggested Precautionary Text for EPA Reg. No. 12455-24

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

Fatal if swallowed ... before reuse.

Environmental Hazards

This product ... of the EPA.

DIRECTIONS FOR USE

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ZP[®] 80

FOR FORMULATING USE ONLY

ACTIVE INGREDIENT:

Zinc Phosphide (CAS #1314-84-7) 80%

INERT INGREDIENTS:..... 20%

TOTAL 100%

KEEP OUT OF REACH OF CHILDREN

ACCEPTED
with COMMENTS
in EPA Letter Dated:

DANGER - POISON

MAR 22 2004



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

FIRST AID

12455-24

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 INHALED:

- Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

IF ON SKIN:

- Rinse skin with water for 15 – 20 minutes. Remove contaminated clothing. Get medical attention.

NOTE TO PHYSICIAN OR VETERINARIAN

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.

WEIGHT: 110 lbs. (50 kg)

Manufactured by:



Bell Laboratories, Inc.
Madison, WI 53704

EPA REG. NO. 12455-24 EPA EST. NO. 12455-WI-1

This Section For Product Label Identification Purposes Only:

ZP-80, EPA Reg. No. 12455-24, Container Label, 091703

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

Fatal if swallowed. Harmful if absorbed through the skin, or inhaled. Avoid breathing dust. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash clothing before reuse. Exposure to this product during pregnancy should be avoided.

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.

This product may be used only to formulate registered concentrates and end-use rodenticide products which are used for any of the following purposes:

1. to control Norway rats, roof rats, and house mice in and around homes, industrial and agricultural buildings, similar man-made structures; inside transport vehicles (ships, trains, aircraft), in and around related port or terminal buildings, and in alleys located in urban areas;
2. uses for which the U.S. Environmental Protection Agency has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
3. Experimental Use Permits that are in compliance with the requirements of the U.S. Environmental Protection Agency.

KEEP AWAY FROM AREAS WHERE THERE IS A POSSIBILITY OF CONTAMINATING FOOD OR SURFACES THAT COME IN DIRECT CONTACT WITH FOOD.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other water unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store only in original container in a dry place, inaccessible to children and pets. Store only in original container. Keep container closed when not in use. Do not store near food or feed.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

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.

091703

