

12455-30

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

306
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5-768731

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 Flash 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	
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	<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>	
<p>If swallowed</p>	<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.
<p>If on skin or clothing</p>	<ul style="list-style-type: none"> •Wash with plenty of soap and water.
<p>If inhaled</p>	<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.

Gopha-Rid®

KILLS GOPHERS and MOLES

ACTIVE INGREDIENT:

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

INERT INGREDIENTS:..... 98%

TOTAL 100%

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 30 2004

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

FIRST AID

12455-30

**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.

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: 50 lbs.

Manufactured by:



Bell Laboratories, Inc.
Madison, WI 53704

EPA REG. NO. 12455-30 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.

USE RESTRICTIONS: For use against pocket gophers and moles in lawns, golf courses, and other noncrop areas. Do not apply in gardens and areas where food or feed may be contaminated. Only apply the bait underground. Collect and bury all dead animals found above the ground. This product is to be used in manual applications only. Do not apply this product by use of an artificial burrow builder.

SPECIFIC DIRECTIONS FOR POCKET GOPHERS: Burrowing pocket gophers (Thomomys spp. and Geomys spp.) throw out low, fan shaped mounds on either side of their underground tunnels. 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 teaspoonful of GOPHA-RID as far down as possible. Replace opening, being careful not to cover bait with soil.

SPECIFIC DIRECTIONS FOR MOLES: The presence of moles may be indicated by a network of surface ridges in the turf, by a series of conical mounds of earth pushed up from deep burrows, or by damage to bulbs.

Surface Ridges: Prior to treatment, determine which burrows are active according to one of the following two methods. Either press down a small section of the tunnel or remove a one-inch section of the tunnel's roof. Mark these sections and recheck in 24 hours. The burrow is considered active if the flattened runway has been raised up or if the roof has been repaired. Only treat active burrows.

Carefully punch a hole in the top of active tunnels, drop a teaspoonful amount of GOPHA-RID and carefully close the hole with sod or stone. Do not collapse the runway again or allow loose soil to cover the bait. After a few days check to see if the burrows are still active according to one of the two methods described above. If so, repeat treatment.

Conical Mounds: Remove center plug from the conical mounds with a long-handled spoon and drop a teaspoonful amount of GOPHA-RID in the underground tunnel. Close opening with rock or sod. Do not allow loose dirt to cover bait.

Bulb Protection (Fall planted): Pack about one-quarter inch of soil against each bulb. Place several teaspoons of baits at side of and around the bulb and then cover.

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.

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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