

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: CONTRAC® All-Weather Cake
EPA Reg. No. 12455-34 ✓
CONTRAC® All-Weather Blox
EPA Reg. No. 12455-79
Your letter of June 8, 2004

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-17
5-78752

Purpose Each submission revises your label according to our last letter.

Claims We have the following comments about two claims on your proposed label: 1) all-weather and 2) sewers.

1. All-Weather

In our January 2, 1997, letter, we noted problems with the use of weather-resistant claims for this and related products because Bell had not submitted data on weathered product. To retain such claims and use of the product in wet or damp areas (including sewers), you need to submit the supporting data or remove these types of claims. Without data, we could not re-register this product with such claims.

2. Sewers

If you wish a sewer claim for these products, let us know, and we will determine the requirements.

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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. Add "Do not use in sewers." to your "USE RESTRICTIONS", as it had appeared in your January 2, 1997, label approval.
2. For non-homeowner sizes (1 lb), use the following format for your "Storage and Disposal" text:

STORAGE AND DISPOSAL

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

Storage: Store ...other chemical.

Pesticide Disposal: Wastes ... disposal facility.

Pesticide Container: Do not ... proper disposal.

3. We prefer that you structure your "USE RESTRICTIONS" as follows to clarify the relationship between this heading and its two subheadings:

USE RESTRICTIONS: For control ... Do not broadcast bait. Do not use in sewers.

Urban Areas: This product ... in alleys.

Non-Urban Areas: This product ... buildings.

4. For EPA Reg. No. 12455-79, include revised labeling for your 4 oz and 8 oz package sizes.
5. After "For control of Norway rats, roof rats, and house mice." add this sentence:

Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food.

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)

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1\Bromadiolone\12455-34, -79, revised label, 9-25-2004,wpd.wpd

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CONTRAC®

All-Weather Cake
Mold Resistant Moisture Resistant

KILLS RATS AND MICE

KILLS WARFARIN RESISTANT NORWAY RATS

Norway rats and house mice may consume a lethal dose in one night's feeding. First dead rodents appearing four or five days after feeding begins.

ACCEPTED with COMMENTS
in EPA Letter Dated:

ACTIVE INGREDIENT:

Bromadiolone (CAS #28772-56-7):0.005%

SEP 30 2004

INERT INGREDIENTS*: 99.995%

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

*Contains Denatonium Benzoate

12455-34

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

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.
- Have person sip a glass of water if able to swallow.
- 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

If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. If ingested, administer Vitamin K₁ intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

NET WEIGHT: 10 lbs. (4.5 Kg)

Manufactured by:



Bell Laboratories, Inc.
Madison, WI 53704

EPA REG. NO. 12455-34

EPA EST. NO. 12455-WI-1

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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 nontarget animals to rodenticides. To help to prevent accidents:

1. Store unused product 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 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. Stronger bait stations are needed in areas open to hooved livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container and unused, spoiled, or unconsumed bait as specified on this label.

USE RESTRICTIONS: For control of Norway rats, roof rats and house mice. When used in USDA-inspected facilities, this product must be applied in tamper-resistant bait stations. Do not broadcast bait.

URBAN AREAS: This product may be used in and around the periphery of homes, industrial, commercial, and public buildings. May also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. May also be used in alleys.

NON-URBAN AREAS: This product may be used inside of homes and agricultural buildings.

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 and snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

Each CONTRAC CAKE consists of a one-pound slab scored to be broken into four 4 oz. pieces.

RATS: Break and apply 1 to 4 pieces of CONTRAC CAKE (usually at intervals of 15 to 30 feet) per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days or until signs of rat activity cease.

MICE: Obtain 1 oz. bait pieces by breaking 4 oz. pieces of CONTRAC CAKE in half and breaking each half in half. Use one 1 oz. piece per bait placement. Space placements at 8 to 12 foot intervals. Two 1 oz. pieces may be needed at points of very

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high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days or until signs of mouse activity cease.

FOLLOW-UP: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead, exposed animals and leftover bait. To prevent reinfestation, limit sources of rodent food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish as needed.

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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