

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**

5-7 @ 784      300  
                              17

**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.

2/0

- 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](mailto: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.**

<b>FIRST AID</b>	
<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"> <li>•Call a poison control center or doctor immediately for treatment advice or transport the patient to the nearest hospital.</li> <li>•Do not drink water.</li> <li>•Do not administer anything by mouth or induce vomiting unless told to do so by the poison control center or doctor.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>•Take off contaminated clothing.</li> <li>•Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>•Call a poison control center or doctor immediately for treatment advice.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>•Move person to fresh air.</li> <li>•If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>•Call a poison control center or doctor immediately for treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>•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.</li> <li>•Call a poison control center or doctor immediately for treatment advice.</li> </ul>

**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.**

<b>FIRST AID</b>	
<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"> <li>•Call a poison control center or doctor immediately for treatment advice or transport the patient to the nearest hospital.</li> <li>•Do not drink water.</li> <li>•Do not administer anything by mouth or induce vomiting unless told to do so by the poison control center or doctor.</li> </ul>
<p>If on skin or clothing</p>	<ul style="list-style-type: none"> <li>•Wash with plenty of soap and water.</li> </ul>
<p>If inhaled</p>	<ul style="list-style-type: none"> <li>•Move person to fresh air.</li> <li>•If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>•Call a poison control center or doctor immediately for treatment advice.</li> </ul>

**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.

5/0

# ZP<sup>®</sup> Rodent Bait

Place Pacs

*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:

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.**

12455-59

### 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.

### 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.

### 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.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Refer to label on container for full instructions.

### STORAGE AND DISPOSAL

Refer to label on container for full instructions.

6/10

**NET CONTENTS: 7.5 g (0.265 oz.)**

Manufactured by:



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

EPA REG. NO. 12455-59

EPA EST. NO. 12455-WI-1

060804