

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

300
12
5-768732

- 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>	
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.

Mole & Gopher Bait

Premeasured Packets

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 Federal Insecticide, Fungicide, and Rodenticide Act

CAUTION as amended, for the pesticide registered under EPA Reg. No.

FIRST AID

12455-85

**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 CONTENTS: 100 x 7.5 g PACKETS

Manufactured by:



Bell Laboratories, Inc.
Madison, WI 53704

EPA REG. NO. 12455-85 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 pocket gophers and moles directly in their underground tunnels.
- 3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

POCKET GOPHERS AND MOLES

USE RESTRICTIONS: This product may be used to control pocket gophers (Thomomys spp. and Geomys spp.) and moles (Scalopus spp. and Scapanus spp.) in rangeland, cropland (grain fields, forage crops, hay and alfalfa crops and vegetable crops). This product may also be used in forest areas, parks, nurseries, lawns, golf courses, around homes, and other noncrop areas. Bait must be applied directly in moles' or pocket gophers' underground burrow systems. Collect and bury all dead animals found above the ground.

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 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. Open 1 packet and pour the contents into the tunnel as far down as possible. Reclose opening, being careful not to cover bait with soil.

MAIN RUNWAY BAITING: To locate main runways, probe about 6-8 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 placement of the bait. Open 1 packet and pour the contents into each active tunnel. Carefully close the hole with a stone, sod, or soil. Take care not to cover bait with soil.

DIRECTIONS FOR MOLES: The presence of moles may be indicated by a network of surface edges 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. Open 1 packet and pour the contents into the tunnel. 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. Then open and pour the contents of 1 packet into 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. Open 1 packet and sprinkle at sides of and around bulb and then cover. One packet will protect 7 to 10 bulbs.

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.

060804

Mole & Gopher Bait

Premeasured Packets
KILLS GOPHERS and MOLES

ACTIVE INGREDIENT:	
Zinc Phosphide (CAS #1314-84-7)	2%
INERT INGREDIENTS:.....	98%
TOTAL	100%

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID

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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 directions. It is illegal to sell these premeasured packets individually.

STORAGE AND DISPOSAL

Refer to label on container for full directions.

NET CONTENTS: 7.5 g

Manufactured by:



Bell Laboratories, Inc.
Madison, WI 53704

EPA REG. NO. 12455-85 EPA EST. NO. 12455-WI-1

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