

12455-91

8/4/2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. John Lublinkhof
Bell Laboratories, Inc.
3699 Kinsman Blvd.
Madison, WI 53704

AUG 04 2010

Dear Mr. Lublinkhof:

Subject: Compliance with EPA's May 28, 2008 Risk Mitigation Decision
Final® Rodenticide Ready-To-Use Place Pacs
EPA Registration No. 12455-91
Submission Date: March 3, 2010

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) to comply with the Agency's revised May 28, 2008 "Risk Mitigation Decision (RMD) for Ten Rodenticides" as amended, will be acceptable provided you submit one (1) revised final printed copy with the following changes before releasing the product for shipment:

1. Within the **SELECTION OF TREATMENT AREAS** section, change "rodents" to "rats and mice".
2. Revise **APPLICATION INSTRUCTIONS** to read **APPLICATION DIRECTIONS** found in the **DIRECTIONS FOR USE** on the place pac label.
3. Change "rata" to "rats" found in the marketing statement, "Place bait in...have been seen."

Terms/Conditions of Sale/Distribution (intended for PCO Only Use):

- a. The registrant must not sell or distribute the product in a manner that results in sale in stores oriented towards residential consumers (e.g. grocery, drug, hardware and home improvement stores). The registrant may sell or distribute the product in a manner that results in sale in stores oriented towards agricultural consumers (i.e. farm, agricultural, tractor stores) and pest control operators.
- b. Product may not be sold in packaging that holds less than 16 pounds of bait.

With the above revisions, this product will be in full compliance with the Agency's revised May 28, 2008 "Risk Mitigation Decision for Ten Rodenticides".

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EPA Registration No. 12455-91

Please be aware of the following stipulations concerning existing stocks:

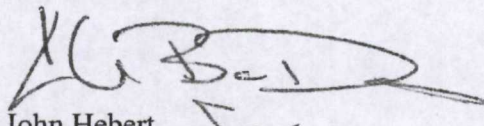
- The registrant may not distribute or sell existing stocks of this product after June 4, 2011 unless they conform to the terms and conditions of registration as amended today.
- Any person other than the registrant may sell and distribute existing stocks of this product with the previously approved label until such stocks are exhausted.
- Any person may use existing stocks of this product with the previously approved label until such stocks are exhausted.

Note: Should you wish to add a reference to the company's website on your label, please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, **regardless of whether a website is referenced on your product's label**, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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. If you have questions about this letter, please contact Jennifer Gaines at (703) 305-5967 or via e-mail at gaines.jennifer@epa.gov.

A stamped copy of the label is enclosed for your records.

Sincerely yours,



John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

30811

OUTER CONTAINER - COMPLETE LABEL - PACKAGE WEIGHTS 16 LB. OR GREATER

FINAL[®]
RODENTICIDE
Ready-To-Use Place Pacs

KILLS RATS AND MICE

ACCEPTED
with COMMENTS
In EPA Letter Dated
AUG 04 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
12455-91

KILLS WARFARIN RESISTANT NORWAY RATS AND HOUSE MICE

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

ACTIVE INGREDIENT:

Brodifacoum (CAS #56073-10-0).....	0.005%
OTHER INGREDIENTS*.....	99.995%
	<u>100.000%</u>

*Contains Denatonium Benzoate

KEEP OUT OF REACH OF CHILDREN
CAUTION

See Back/Side Panel for First Aid and additional precautionary statements.

NET WEIGHT:
16 lb. - 50 lb. containers

Manufactured by:

Batch Code:



Bell Laboratories, Inc.
3699 Kinsman Blvd.
Madison, WI 53704

EPA REG. NO. 12455-91

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 only for sites, pests, and application methods described on this label.

IMPORTANT: Do not expose children, pets, or nontarget animals to rodenticides. To help to prevent exposure:

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

hoofed 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.

Note: Bait stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait.

USE RESTRICTIONS: For control only of Norway rats, roof rats and house mice in and around homes, industrial, commercial, agricultural, and public buildings, and similar manmade structures. May also be used in transport vehicles (ships, trains, aircraft) and in and around related port and terminal buildings. **Do not apply further than 50 feet from buildings.** Do not use in sewers. Do not place near or inside ventilation duct openings. Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment or surfaces that come into direct contact with food. Do not broadcast bait. When used in USDA inspected facilities, this product must be applied in tamper-resistant bait stations.

Do not sell this product in individual containers holding less than 16 pounds of bait.

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:

RATS: Apply 4 to 16 pacs (at intervals of 15 to 30 feet) per placement in infested areas. Maintain an uninterrupted supply of fresh bait for at least 10 days or until there no longer are signs of fresh rat activity.

MICE: Apply 1 pac per placement. Space placements at 8 to 12 foot intervals in infested areas. Two pacs may be applied at points of extremely high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days or until there no longer are signs of fresh mouse activity.

FOLLOW-UP: Replace contaminated or spoiled bait immediately. Wearing gloves, 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. Keep away from children, domestic animals and pets.

All handlers (including applicators) must wear shoes plus socks, and gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves.

User Safety Requirements
Follow manufacturer's instruction for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

FIRST AID
HAVE LABEL WITH YOU WHEN OBTAINING TREATMENT ADVICE

If Swallowed	<ul style="list-style-type: none"> • Call a poison control center, doctor, or 1-877-854-2494 immediately for treatment advice. • Have a 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 In Eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with warm water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center, doctor, or 1-877-2494, immediately for treatment advice.

NOTE TO PHYSICIAN

If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. If ingested, administer Vitamin K₁ intramuscularly or orally. Vitamin K₁ is antidotal at doses of 10-20 mg (not mg/kg). Repeat as necessary based on monitoring of prothrombin times.

TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian or 1-877-854-2494 at once.

NOTE TO VETERINARIAN

Anticoagulant Brodifacoum: For animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K₁ at doses of 2-5 mg/kg. If needed, check prothrombin times every 3 days until values return to normal (up to 30 days). In severe cases, blood transfusions may be needed.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to mammals and birds. Dogs, cats and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. This pesticide is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff also may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash water or rinsate.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store only in original container in a cool, dry place inaccessible to children and pets. Keep containers closed and away from other chemicals.

Pesticide Disposal: Dispose of wastes resulting from the use of this product in trash or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. **[Plastic:]** Triple rinse (or equivalent), then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or by incineration. In most states, burning is not allowed. **[Paper:]** Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration. In most states, burning is not allowed.

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WARRANTY: To the extent consistent with applicable law, 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.

INNER CONTAINER - COMPLETE LABEL - PACKAGE WEIGHT 2 LB. TO 10 LB.

FINAL[®]
RODENTICIDE
Ready-To-Use Place Pacs

KILLS RATS AND MICE

KILLS WARFARIN RESISTANT NORWAY RATS AND HOUSE MICE

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

ACTIVE INGREDIENT:	
Brodifacoum (CAS #56073-10-0).....	0.005%
OTHER INGREDIENTS*:	<u>99.995%</u>
	100.000%

*Contains Denatonium Benzoate

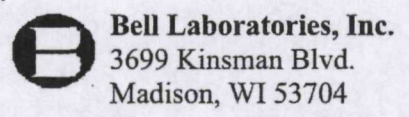
KEEP OUT OF REACH OF CHILDREN
CAUTION

NET WEIGHT: 2 lb. to 10 lb. containers

INDIVIDUAL SALE IS PROHIBITED BY LAW

Manufactured by:

Batch Code:



EPA REG. NO. 12455-91

EPA EST. NO. 12455-WI-1

DIRECTIONS FOR USE

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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.

Note: Bait stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait.

USE RESTRICTIONS: For control only of Norway rats, roof rats and house mice in and around homes, industrial, commercial, agricultural, and public buildings, and similar manmade structures. May also be used in transport vehicles (ships, trains, aircraft) and in and around related port and terminal buildings. **Do not apply further than 50 feet from buildings.** Do not use in sewers. Do not place near or inside ventilation duct openings. Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment or surfaces that come into direct contact with food. Do not broadcast bait. When used in USDA inspected facilities, this product must be applied in tamper-resistant bait stations.

Do not sell this product in individual containers holding less than 16 pounds of bait.

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APPLICATION DIRECTIONS:

RATS: Apply 4 to 16 pacs (at intervals of 15 to 30 feet) per placement in infested areas. Maintain an uninterrupted supply of fresh bait for at least 10 days or until there no longer are signs of fresh rat activity.

MICE: Apply 1 pac per placement. Space placements at 8 to 12 foot intervals in infested areas. Two pacs may be applied at points of extremely high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days or until there no longer are signs of fresh mouse activity.

FOLLOW-UP: Replace contaminated or spoiled bait immediately. Wearing gloves, 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.

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NOTE TO PHYSICIAN

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STORAGE AND DISPOSAL

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INNER CONTAINER – ABBREVIATED LABEL – INDIVIDUAL PLACE PACS

FINAL[®]

RODENTICIDE

Ready-To-Use Place Pac

KILLS RATS AND MICE

KILLS WARFARIN RESISTANT NORWAY RATS AND HOUSE MICE

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ACTIVE INGREDIENT:

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OTHER INGREDIENTS*..... 99.995%

100.000%

*Contains Denatonium Benzoate

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

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SEE LABEL ON OUTER PACKAGING FOR ADDITIONAL PRECAUTIONARY INFORMATION

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. See outer package label for complete DIRECTIONS FOR USE including USE RESTRICTIONS and APPLICATION INSTRUCTIONS. It is illegal to sell this product unless it is accompanied by a complete set of its accepted labeling.

NET WEIGHT: 0.88 oz. (25 g)

INDIVIDUAL SALE IS PROHIBITED BY LAW

Manufactured by:



Bell Laboratories, Inc.
3699 Kinsman Blvd.
Madison, WI 53704

EPA REG. NO. 12455- 91

EPA EST. NO. 12455-WI-1

OPTIONAL MARKETING STATEMENTS:

With Brodifacoum
For Use in and Around Homes and Buildings
Palatable Formulation
Mouse and rat bait
For indoor and outdoor rat and mouse control
Bait pacs can be used indoors or out
Place pacs fit into rat burrows where they live and breed

Place bait in locations inaccessible to children, pets, and wildlife or if children, pets, non-target mammals, or birds may access the bait, place bait in tamper-resistant bait stations where rats and mice or their signs have been seen.

Maintain an uninterrupted supply for 15 days (mice) or 10 days (rats) or until all signs of activity stop.

- Pre-measured
- Ready to Use
- Made in USA
- Pelleted Bait
- Contains Pelleted Bait
- Pellets
- Pellet formula
- Pellet formulation
- Bulk pellets
- Ready To Use Place Pack (Pac) Pellets
- Place Pack (Pac) Pellets
- Place Packs (Pac)

OPTIONAL GRAPHICS WITHOUT TEXT:



Version 060810