

12455-94

PM-04

7-8-98

1 of 4



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

JUL 8 1998

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Christine E. Benter
Bell Laboratories, Inc.
3699 Kinsman Blvd.
Madison, WI 53704

S 534004 166/18
S 545374 166/18

Subject: Final Rodenticide Place Pac
EPA Reg. No. 12455-94
Your Letter and Revised Labeling dated May 20, 1998 and Letter and
Submission of Additional Data dated May 19, 1998.

Dear Ms. Benter,

Your two letters regarding EPA Reg. No. 12455-94, dated May 19 and May 20, 1998, with attached submissions of revised labeling and additional data for the mouse placepack penetration study (MRID No. 444522-01), have been reviewed. The conclusions of our review are discussed below.

1. We have examined the additional information submitted regarding the mouse placepack-penetration study (MRID# 444522-01) that was previously submitted on December 19, 1997. We conclude that the study and the proposed label changes related to the study are acceptable. We note, however, that the bait formulation did not appear to be accepted well by house mice, especially females, in some of the tests reported. As killing females is the key to successful control of this species, we suggest that you look for a bait formulation that female house mice will accept readily.
2. Your proposed revised labeling is acceptable from the standpoint of efficacy **provided** you make one change to the labeling for the individual placepacks and the outer container. When you print final labels, insert a space between the last two sentences of the "SELECTION OF TREATMENT AREAS:" subsection of the "DIRECTIONS FOR USE" on the outer-container label and the placepack label (i.e., change "snow.Remove" to "snow. Remove").

Please submit one copy each of your revised final printed labeling for the

outer container and the individual 50-g placepacks before you release the product for shipment. We caution you to refrain from adding any claims or directions to the final printed labeling that were not part of the stamped accepted labeling. 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 bearing the amended labeling constitutes acceptance of these conditions.

Stamped copies of the individual 50-g placepack label and the outer container label are enclosed for your records. If you have any questions regarding this letter, please call me at (703) 305-5417 or (703) 305-5404.

Sincerely yours,



Peg Perreault
Chemical Manager, Team 4
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosures (2)

ACCEPTED
with COMMENTS
In EPA Letter Dated:

July 8, 1998

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

12455-94

Final[®]
RODENTICIDE

PLACE PAC

KILLS RATS AND MICE

Kills Warfarin Resistant Norway Rats and House Mice

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

ACTIVE INGREDIENT: Brodifacoum, 3-(2,4,6-trichlorophenyl)-4-methyl-5-pyridyl-1,3,4-thiazole-5-carboxamide, 0.005%
INERT INGREDIENTS 99.995%
TOTAL 100.000%
*Contains Denatonium Benzoate

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

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 as indicated in fishery chemotherapy overdoses. Repeat as necessary based on monitoring of prothrombin times.

For 24-hour emergency medical advice, call 1-800-228-5635 ext. 311.

FOR SPECIFIC STATEMENTS OF PRACTICAL TREATMENT, REFER TO THE OUTER CONTAINER LABEL FOR THIS PRODUCT.

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful or fatal if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling bait.

ENVIRONMENTAL HAZARDS: This product is toxic to fish, birds, and wildlife. This product can pose a secondary hazard to birds of prey and mammals. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

Net Contents 1.76 oz. (50 grams)

Mfg. by:



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

EPA REG. NO. 12455-04
EPA EST. NO. 12455-WI-1

SELECTION OF TREATMENT AREAS: Determine areas where rats or mice will most likely find and consume the bait. Generally, these are along walls, by grained 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 or snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS: RATS: Apply 2 to 8 pacs (usually at intervals of 15 to 30 feet) per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days or until there no longer are signs of fresh rat activity.

HOUSE MICE: Open pac and apply 1/4 to 1/2 ounce of bait per placement. Space placements at 8- to 12 foot intervals. Larger placements, up to one uncovered pac, may be needed 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.

STORAGE AND DISPOSAL: STORAGE: Store only in original container, in a dry area inaccessible to children and pets. Do not reuse empty container. Security wrap original container in several layers of newspaper and discard in trash.

DISPOSAL: Do not reuse empty container. Security wrap original container in several layers of newspaper and discard in trash.

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:

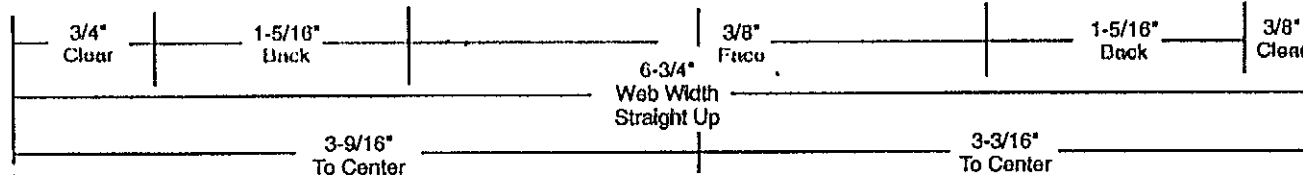
1. Store product out of use in a location out of reach of children and pets.

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 stolen from stations when they are filled, units must be secured or otherwise immobilized. Even 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, and unconsumed bait as specified on this label.

USE RESTRICTIONS: For control of Norway rats, roof rats and house mice in and around homes, industrial, commercial, agricultural and public buildings, and similar manmade structures. FINAL[®] Place Pacs may also be used in transport vehicles (buses, trains, aircraft) and in and around relative port or terminal buildings. This product may also be used in sewers. Do not use in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast bait.

5.027"
Cut Off
3 Around
15.080"
Cylinder
Straight Up



3044

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 to prevent accidents:

1. Store product not in use in a location 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 stations when they are lifted, units must be secured or otherwise immobilized. Even 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, and unconsumed bait as specified on this label.

USE RESTRICTIONS:

For control of Norway rats, roof rats and house mice in and around homes, industrial, commercial, agricultural and public buildings, and similar manmade structures. FINAL® Place Pacs may also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product may also be used in alleys. Do not use in sewers. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast bait.

SELECTION OF TREATMENT AREAS: Determine areas where rats or mice will most likely find and consume the bait. Generally, these 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 or snow. Remove as much alternative food as possible.

See right side panel for additional DIRECTIONS FOR USE



KILLS RATS AND MICE

Kills Warfarin Resistant Norway Rats and House Mice
Norway rats and house mice may consume a lethal dose in one feeding with first dead rodents appearing four or five days after treatment begins.

ACTIVE INGREDIENTS: Brodifacoum; 3-[3-(4-Bromo-1,1'-biphenyl)-4-yl]-1,2,3,4-tetrahydro-1-naphthalenyl]- 4-hydroxy-2H-1-benzopyran-2-one.....		0.005%
INERT INGREDIENTS*.....		99.995%
*Contains Denatonium Benzoate	TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN CAUTION

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Call physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

If on Skin: Wash with plenty of soap and water. Get medical attention if symptoms persist.

If in Eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

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 as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

For 24-hour emergency medical advice, call 1-800-228-5635 ext. 311.

(SEE RIGHT PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.)

NET WEIGHT: 100 x 50 g

Mfg. by:



Bell Laboratories, Inc.
Madison, WI 53705

EPA REG. NO. 12455-94

**ACCEPTED
with COMMENTS**

In EPA Letter Dated:

July 8, 1998

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

12455-94

DIRECTIONS FOR USE (Continued from left side panel.)

APPLICATION DIRECTIONS:

RATS: Apply 2 to 8 pacs (usually at intervals of 15 to 30 feet) per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days or until there no longer are signs of fresh rat activity.
HOUSE MICE: Open pac and apply 1/4 to 1/2 ounce of bait per placement. Space placements at 8- to 12-foot intervals. Larger placements, up to one unopened pac, may be needed 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.

RATS/MICE: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and leftover bait properly. 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

HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful or fatal if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling bait.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and wildlife. This product can pose a secondary hazard to birds of prey and mammals. For terrestrial uses, do not apply 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 dry area inaccessible to children and pets.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of onsite or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty container. Then dispose of empty container in sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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