

12455-101

06/23/2010

1/13

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Decision 402840

$\frac{360}{1155}$ $\frac{5-877024}{}$

JUN 23 2010

Bell Laboratories
3699 Kinsman Blvd.
Madison, WI 53704

Attention: Mr. John Lublinkhof

Subject **Talpirid**
 EPA Reg. No. 12455-101
 Your resubmission of June 17, 2010

Purpose This submission proposes to revise the label for this product, under sec 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), to comply with the May 28, 2008, "Risk Mitigation Decision (RMD) for Ten Rodenticides".

Review This product must be compliant with the RMD and consistent with the 1998 Rodenticide Cluster Reregistration Eligibility Decision (RED) document.

Labeling 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 before you release the product for shipment.


With the above condition, this product will be in full compliance with the Agency's revised May 28, 2008 "*Risk Mitigation Decision for Ten Rodenticides*" and consistent with the 1998 Rodenticide Cluster RED.

Website **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.

- 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.

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,


John Hebert, Team Leader
 Insecticide-Rodenticide Branch
 Registration Division (7505P)

Letter Location Dan Peacock, Flash Drive, 16gb, E:\4G
 Dan\Doc\Word\Bromethalin\Registration Actions\Amend, RMD, 12455-101, 6-22-2010.doc

OUTER CONTAINER- COMPLETE LABEL

TALPIRID

**This Product May Only be Used to Control Moles in Manual,
Below-Ground Applications.**

MOLE BAIT
KILLS MOLES

EFFECTIVE AGAINST MOST COMMON MOLES ACCEPTED

MIMICS A MOLE'S NATURAL FOOD SOURCE With COMMENTS
in EPA Letter Dated:

READY TO USE

JUN 23 2010
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the

Scientifically designed and tested to mimic a mole's natural food source. Moles may consume a lethal dose in a single feeding, but it may take two or more days from the time of bait consumption for moles to die.

pesticide Registered under EPA Reg. No.

12455-101

ACTIVE INGREDIENT:	
Bromethalin (CAS #63333-35-7):.....	0.025%
INERT INGREDIENTS.....	99.975%
TOTAL	100.00%

**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.

TREATMENT FOR PET POISONING

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

NOTE TO PHYSICIAN OR VETERINARIAN

Contains the nerve poison Bromethalin. This is not an anticoagulant type rodenticide. For humans or animals ingesting bait and/or showing poisoning signs (such as muscle tremors, loss of hind limb use, or seizures for animals), limit absorption by either emesis or gastric lavage. Sublethal symptoms, if present, would be the result of cerebral edema and should be treated accordingly through administration of an osmotic diuretic and corticosteroid.

012455-00101.20100617

NET WEIGHT: Range: 20 – 100 g

Manufactured by:

BATCH CODE:



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

EPA REG. NO. 12455-101

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 to this product or use it for any purpose other than to control moles. To help prevent accidents:

1. Store product not in use in locations out of the reach of children and pets.
2. Follow all application directions and **USE RESTRICTIONS** on this label. Apply bait only in underground runways of moles. Keep pets out of treated areas. Do **NOT** use this product above ground.
3. Dispose of product container and unused or spoiled product as specified on label.

USE RESTRICTIONS: This product may only be applied at the use sites and by the application methods indicated on this label. This product may only be used in lawns, parks, around homes, golf courses, ornamental gardens, nurseries and other non-crop grassy areas to control eastern moles (*Scalopus aquaticus*), star-nosed moles (*Conylura cristata*) or *Scapanus spp.* Bait must be applied directly into moles' burrow systems. This bait must be applied underground in either main underground runways or in subsurface feeding tunnels. This bait may not be used above ground. Wear gloves when bait is handled.

SELECTION OF TREATMENT AREAS: The presence of moles may be indicated by a network of subsurface runways in the turf or by a series of conical mounds of earth pushed up from deep burrows. Subsurface runways are indicated by raised ridges of vegetation and soil caused by moles foraging for food just below the soil surface. These runways are especially noticeable when the grass above them turns yellow. Conical mounds may be indicative of the location of deeper main underground runways.

APPLICATION DIRECTIONS:

(Qualifier statement for package containing worm shaped baits:) Remove and place worm shaped bait according to use directions below and **ADDITIONAL GRAPHICS AND TEXT.**

(Qualifier statement for package containing grub shaped baits:) Remove and place grub shaped bait according to use directions below and **ADDITIONAL GRAPHICS AND TEXT.**

SUBSURFACE RUNWAYS: TALPIRID has been specially designed to mimic the natural food sources of the mole. To achieve maximum effect, TALPIRID should only be placed in areas used habitually by moles for feeding.

ESTABLISHING INITIAL ACTIVITY: Use your finger, small wooden dowel or a narrow rod to puncture a hole in the top of subsurface runways. Be careful not to crush runways. Mark opened runways

and revisit them 48 to 72 hours later. Runways that have had holes resealed within 72 hours should be baited.

BAITING ACTIVE RUNWAYS: Make a hole in the top of the runway with a rod slightly larger than the diameter of the bait. Drop one worm into the runway, using the rod to push any exposed bait completely into the runway. Carefully reseat the runway with a small amount of dirt to exclude light. Repeat bait application every 5 to 10 feet of each active subsurface runway.

(Alternate language for package containing grub shaped baits only:)

BAITING ACTIVE RUNWAYS: Make a hole in the top of the runway with a rod slightly larger than the diameter of the bait. Drop two grubs (one placement) into the runway, using the rod to push any exposed bait completely into the runway. Carefully reseat the runway with a small amount of dirt to exclude light. Repeat bait application every 5 to 10 feet of each active subsurface runway.

DETERMINING BAITING RESULTS: Five (5) to 7 days after bait application, check for mole activity using the same procedure for determining initial activity. Return 48 to 72 hours later and retreat all active runs.

MAIN UNDERGROUND TUNNELS AND CONICAL MOUNDS: Moles construct deeper tunnels that are not visible from the surface. These deep tunnels systems are often marked by a series of conical mounds (piles of dirt) 4 to 12 inches high formed when dirt is pushed to the surface when moles construct these tunnels. To locate deep tunnels, push a probe, such as a broom handle, into the soil between mounds. When the probe enters a tunnel, the resistance on the probe will decrease rapidly. Mark opened tunnels and revisit them 48 to 72 hours later. Runways that have had holes resealed within 72 hours should be baited.

To bait deep tunnels, drop one TALPIRID worm through the probe hole, using the probe to push the bait completely into the tunnel. Cover the hole with a piece of sod, a small rock or a piece of newspaper to allow for visual inspection. Repeat bait application every 5 to 10 feet of each active deep tunnel and within 5 feet of each active conical mound. Check for the effects of treatment 5 to 7 days after bait application using the same procedure for determining tunnel location. Return 48 to 72 hours later and retreat all active tunnel systems.

(Alternate language for package containing grub shaped baits only:)

To bait deep tunnels, drop two TALPIRID grubs (one placement) through the probe hole, using the probe to push the bait completely into the tunnel. Cover the hole with a piece of sod, a small rock or a piece of newspaper to allow for visual inspection. Repeat bait application every 5 to 10 feet of each active deep tunnel and within 5 feet of each active conical mound. Check for the effects of treatment 5 to 7 days after bait application using the same procedure for determining tunnel location. Return 48 to 72 hours later and retreat all active tunnel systems.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Keep away from children, domestic animals and pets. Do not get in eyes, on skin, or on clothing.

All handlers (including applicators) must wear shoes, 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.

For consumer size products 1 lb. or less:
Replace "All handlers...gloves." and the User Safety Requirements with:

Anyone handling baits must wear gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

Prolonged or frequent repeat skin contact may cause allergic reactions in some individuals

Environmental Hazards

This product is extremely toxic to mammals and birds. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water.

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: Wastes resulting from the use of this product may be placed in trash or delivered to an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration.

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 are contrary to label instructions.

Alternate Storage and Disposal Language for packaging intended solely for household consumer use:

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: Nonrefillable container. Do not reuse or refill 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.

INNER CONTAINER – ABBREVIATED LABEL

TALPIRID

**This Product May Only be Used to Control Moles in Manual,
Below-Ground Applications.**

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See outer container for additional precautionary statements.

ACTIVE INGREDIENT:	
Bromethalin (CAS #63333-35-7):.....	0.025%
INERT INGREDIENTS.....	99.975%
TOTAL	100.00%

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.

TREATMENT FOR PET POISONING

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

NOTE TO PHYSICIAN OR VETERINARIAN

Contains the nerve poison Bromethalin. This is not an anticoagulant type rodenticide. For humans or animals ingesting bait and/or showing poisoning signs (such as muscle tremors, loss of hind limb use, or seizures for animals), limit absorption by either emesis or gastric lavage. Sublethal symptoms, if present, would be the result of cerebral edema and should be treated accordingly through administration of an osmotic diuretic and corticosteroid.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

See outer box for full "DIRECTIONS FOR USE" text.

See outer box for full "STORAGE AND DISPOSAL" text.

NET WEIGHT: 10-50 g

INDIVIDUAL SALE IS PROHIBITED BY LAW

Manufactured by:



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

EPA REG. NO. 12455-101

EPA EST. NO. 12455-WI-1

NOTE: MUST BE USED UNDERGROUND

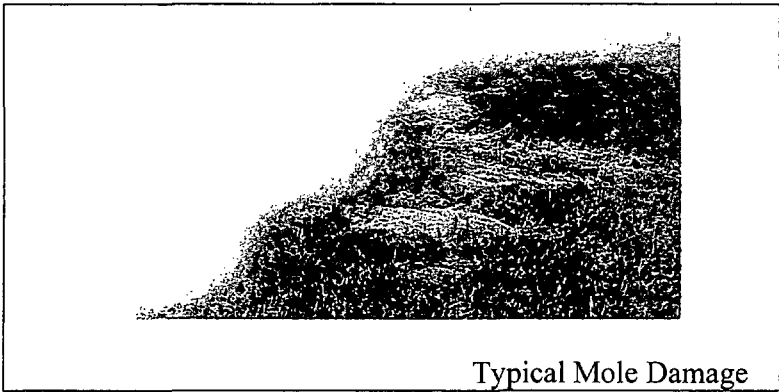
OPTIONAL MARKETING STATEMENTS FOR WORM SHAPED BAIT:

- 6 Placements
- 6 Worms – 1 Worm Per Placement
- 8 Placements
- 8 Worms – 1 Worm Per Placement
- Contains 20 worm shaped baits (TWO Individually Sealed Trays of 10)
- Worm Formula
- Worm Shaped Baits
- Available Exclusively From

OPTIONAL MARKETING STATEMENTS FOR GRUB SHAPED BAIT:

- 4 Placements
- 8 Grubs – 2 Grubs Per Placement
- Grub Formula
- Grub Shaped Baits
- Available Exclusively From

ADDITIONAL GRAPHICS AND TEXT FOR WORM SHAPED BAIT:



Other mole baits have been developed on the premise that moles are similar to rats and mice, when in reality moles are insectivores (insect eaters). Moles readily consume earthworms, and when available, grubs. In fact, more than 90% of a mole's average daily dietary requirements are from earthworms and grubs.

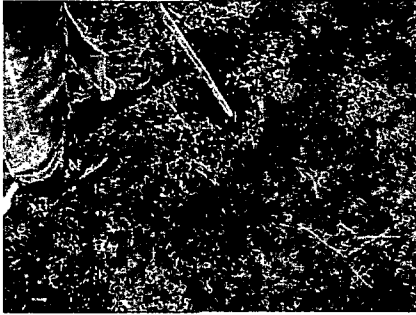
Thousands of hours of groundbreaking laboratory and field research have gone into the product you are holding. Talpirid has been carefully designed to mimic a mole's most common natural food source – earthworms and grubs. Moles may consume a lethal dose in a single feeding, but it may take two or more days from the time of bait consumption for moles to die.



1. Verify Active Runways

Use your finger, small wooden dowel or a narrow rod to puncture a hole in the top of subsurface** runways. NOTE: Be careful to not crush runway.

Mark opened runways and revisit them 48-72 hours later. Runways that have had holes resealed within 72 hours should be baited. (See Step 2)

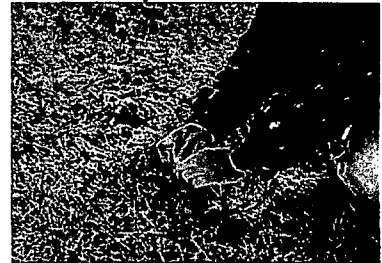
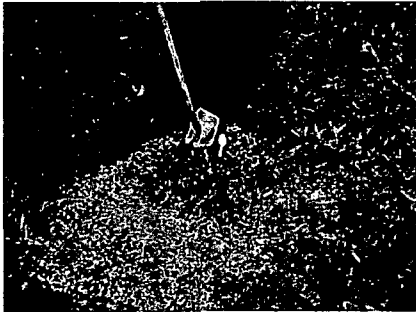


2. Bait Active Runways

Make a hole in the top of the runway with a rod slightly larger than the diameter of the bait.

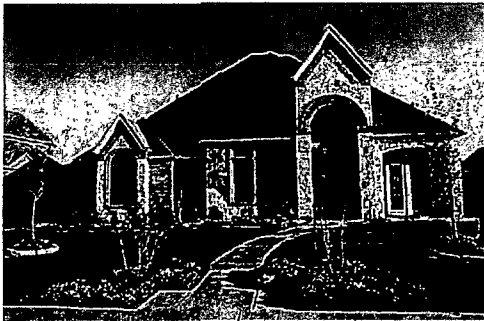
Drop one worm into the opening, ensuring that the worm is completely in the runway. No part of the worm should be exposed

Carefully reseat by pinching hole closed. If not possible, cover with a small rock. Repeat bait application every 5-10 feet of active runway.



3. Determine Baiting Results

Five to seven days after application, check for mole activity using the same procedure for determining initial activity. Return 48-72 hours later and retreat all active runs.

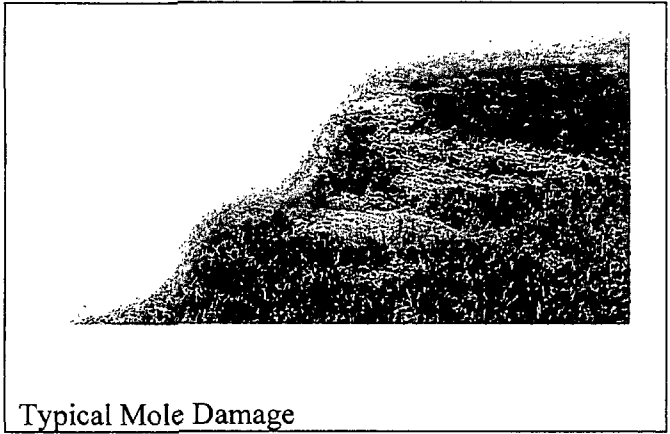


** Deep tunnel/mound systems require a slightly different procedure. See bottom of package for details.

NOTE: All properties are susceptible to recolonization. However, properties near woods, fields, streams/lakes, etc. are especially prone to this. These areas will have to be continually monitored and retreated if activity returns.

To bait deep tunnels, drop one TALPIRID worm through the probe hole, using the probe to push the bait completely into the tunnel. Cover the hole with a piece of sod, a small rock or a piece of newspaper to allow for visual inspection. Repeat bait application every 5 to 10 feet of each active deep tunnel and within 5 feet of each active conical mound. Check for the effects of treatment 5 to 7 days after bait application using the same procedure for determining tunnel location. Return 48 to 72 hours later and retreat all active tunnel systems.

ADDITIONAL GRAPHICS AND TEXT FOR GRUB SHAPED BAIT:



Other mole baits have been developed on the premise that moles are similar to rats and mice, when in reality moles are insectivores (insect eaters). Moles readily consume earthworms, and when available, grubs. In fact, more than 90% of a mole's average daily dietary requirements are from earthworms and grubs.

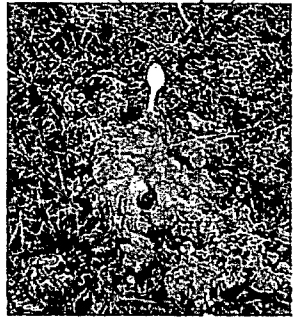
Thousands of hours of groundbreaking laboratory and field research have gone into the product you are holding. Talpirid has been carefully designed to mimic a mole's most common natural food source – earthworms and grubs. Moles may consume a lethal dose in a single feeding, but it may take two or more days from the time of bait consumption for moles to die.



1. Verify Active Runways

Use your finger, small wooden dowel or a narrow rod to puncture a hole in the top of subsurface** runways. NOTE: Be careful to not crush runway.

Mark opened runways and revisit them 48-72 hours later. Runways that have had holes resealed within 72 hours should be baited. (See Step 2)

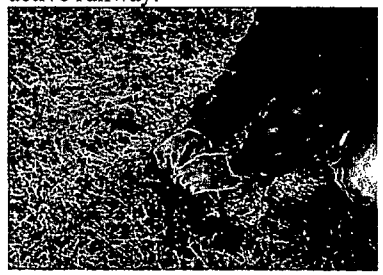
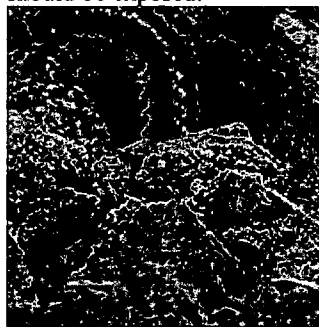


2. Bait Active Runways

Make a hole in the top of the runway with a rod slightly larger than the diameter of the bait.

Drop two grubs (one placement) into the opening, ensuring that the grubs are completely in the runway. No parts of the grubs should be exposed.

Carefully reseat by pinching hole closed. If not possible, cover with a small rock. Repeat bait application every 5-10 feet of active runway.



3. Determine Baiting Results

Five to seven days after application, check for mole activity using the same procedure for determining initial activity. Return 48-72 hours later and retreat all active runs.

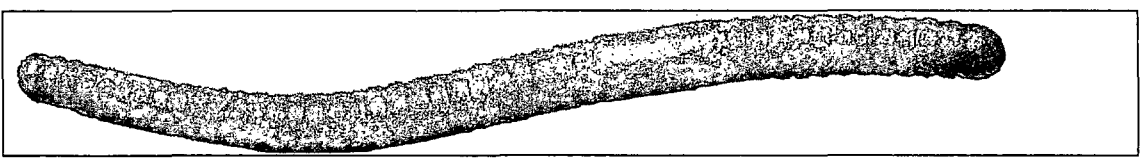


** Deep tunnel/mound systems require a slightly different procedure. See bottom of package for details.

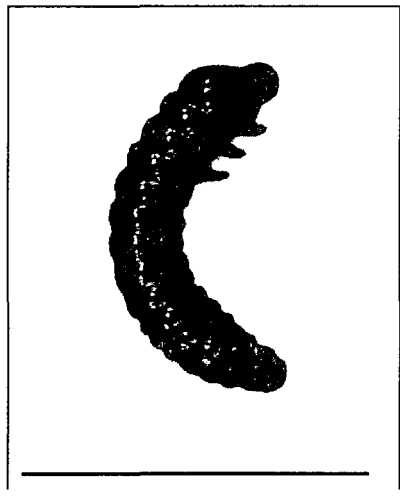
NOTE: All properties are susceptible to recolonization. However, properties near woods, fields, streams/lakes, etc. are especially prone to this. These areas will have to be continually monitored and retreated if activity returns.

To bait deep tunnels, drop two grubs (one placement) through the probe hole, using the probe to push the bait completely into the tunnel. Cover the hole with a piece of sod, a small rock or a piece of newspaper to allow for visual inspection. Repeat bait application every 5 to 10 feet of each active deep tunnel and within 5 feet of each active conical mound. Check for the effects of treatment 5 to 7 days after bait application using the same procedure for determining tunnel location. Return 48 to 72 hours later and retreat all active tunnel systems.

ADDITIONAL GRAPHICS WITHOUT TEXT FOR WORM SHAPED BAIT:



ADDITIONAL GRAPHICS WITHOUT TEXT FOR GRUB SHAPED BAIT:



Version 061710