

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 28, 2008

Bell Laboratories
3699 Kinsman Blvd.
Madison, WI 53704

300
1165
5-821034

Attention: Mr. John Lublinkhof

Subject: ZP® Rodent Oat Bait AG
EPA Reg. No. 12455-102
Your amended application of September 27, 2007
Your amended application of December 7, 2007

- Purpose** The purpose of this submission is to revise the label of this product, under section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). These changes include adding the state of Montana and Richardson's Ground Squirrels under directions for alfalfa, barley, and wheat; adding ground squirrels and gophers to "Orchards and Groves"; and extending treatment period from "July-December" to "July-January" under "Rangeland and Adjacent Noncrop Areas".
- Data** We have reviewed the data submitted or cited. We have attached a copy of our review. With respect to requests for additional claims, the data support the addition of Richardson's Ground Squirrels under directions for alfalfa, barley, and wheat but do not support the adding of ground squirrels and gophers to "Orchards and Groves". Use in Montana was acceptable.
- 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 change, before you ship your product.
1. Change your prebait from "cracked corn" to "untreated steam crimped oats", wherever it occurs.
 2. Under "Orchards and Groves", delete "California ... (Thomomys spp.)."

Label-continued

- 3. Add the sentence "Wear rubber gloves curing hand-broadcast operations." wherever you have directions for hand broadcast.
- 4. Under the "ENDANGERED SPECIES CONSIDERATIONS" section, in the "UTAH:" portion, change "parviden" to "parvidens" and in the "CALIFORNIA:" portion, change "raviventris" to "raviventris", "Diposomys hurmani" to "Dipodomys heermanni", "leucoparia" to "leucopareia", "stephens" to "stephensi".

Note: Generic and specific names (binomial nomenclature) may be italicized or underlined on labels. Use of italics has become more common in recent decades. Whichever option is selected, it should be used consistently throughout the label.

- 5. Modify your "Baiting:" directions for "Commensal Rats and Mice" according to Enclosure 1 to make them consistent with an acute rodenticide.
- 6. For Alfalfa, Barley, and Wheat, revise your use directions according to Enclosure 1.
- 7. For your convenience, we have enclosed all of the above required labeling changes and additional labeling improvements that also need to be made at this time.

Existing stocks
Questions

Stocks of existing labels may be used for eighteen (18) months.
 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,

DBP
 Daniel B. Peacock, Biologist
 Insecticide-Rodenticide Branch
 Registration Division (7504C)

Enclosure

Enclosure 1. Revised Use Directions for 12455-102
 Enclosure 2. Stamped Label; Enclosure 3. Review of Efficacy Data

Location

Dan Peacock, Flash Drive, 2gb, P:\Documents\Word, WP, Excel, etc\Zinc Phosphide\12455\12455-102\12455-102, added claims\12455-102, add claims, other changes, rev label, 2-25-2008.doc

Enclosure 1. Use Directions for 12455-102

DIRECTIONS FOR USE

It is a violation ... labeling.

Read this Label: Read this entire ... label.

Use Restrictions (for all use patterns): Do not apply this product ... during this application.

Limitations: The following Limitations apply to all agricultural areas and used sites listed on this label. This product must not be applied on ... treated areas.

NONCROP RIGHTS-OF-WAY

Use Restrictions: For control of California ground squirrels (*Spermophilus beecheyi*) on noncrop rights-of-way adjacent to canal and ditch banks and other noncrop borders during late spring and early summer. This product ... food or feed.

Prebaiting: Prebaiting with 6 pounds of untreated steamed crimped oats per acre one to two days prior to using ZP RODENT BAIT AG is likely to enhance bait acceptance by California ground squirrels.

Baiting: Treat only once during treatment period ... acre. Bait may be applied only to the canal right-of-way between the base of the levee and adjacent properties. The canal and levee may not be treated. Dispose of ... burial.

PRAIRIE DOGS IN RANGELAND AND ADJACENT NONCROP AREAS

Use Restrictions: For control of black-tailed prairie dogs (*Cynomys ludovicianus*), white-tailed prairie dogs (*C. leucurus*), and Gunnison (Zuni) prairie dogs (*C. gunnisoni*) on rangeland in the western United States (North Dakota ... and Wyoming).

Prebaiting: Prebait with 4 grams (one teaspoon) of untreated steam crimped oats per mound, one or two days prior to baiting, to increase acceptance of treated bait by prairie dogs.

Baiting: Apply bait only after ... burial.

KANGAROO RATS IN RANGELAND VEGETATION AND NONCROP AREAS

Use Restrictions: For control of Ord's kangaroo rats (*Dipodomys ordii*), banner-tailed kangaroo rats (*D. spectabilis*), and Merriam's kangaroo rats (*D. merriami*) in rangeland vegetation and noncrop areas. Do not apply this product within the occupied habitats of threatened or endangered species or subspecies of kangaroo rats.

Hand Baiting: Place one tablespoon (12 grams) of bait at 2 locations in feeding runs near the entrances to kangaroo rat burrows.

MACADAMIA NUT ORCHARDS AND ADJACENT NONCROP AREAS

Use Restrictions: For control of roof rats (*Rattus rattus*) in macadamia nut orchards and adjacent noncrop areas.

Spot Treatment: Bait may be placed ... in trees. Place 1-2 teaspoons (4-8 grams) of bait in bait stations at the base of each tree and in each station in trees. Uneaten bait must ... harvesting round.

Burrow Treatment: Place 1-2 teaspoons (4-8 grams) of bait in each burrow. No preharvest ... burrows

Broadcast Baiting: Broadcast at the rate of five (5) ... per year.

ORCHARDS AND GROVES

Use Restrictions: For control of meadow voles, prairie voles, pine voles, California voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.) in orchards and groves. Apply bait after ... phase.

Hand Baiting: Near the base of each ... trees.

Trail Builder: Set equipment to drop one teaspoon quantity (4 grams) of bait at 4- to 5-foot intervals in the artificial trail, made by the machine, just inside the drop line on both sides of the trees. Apply bait at the rate of 2-3 pounds per acre of infested trees.

Broadcast Baiting: Under infested trees, broadcast bait evenly by cyclone seeder or by hand. **Wear rubber gloves during hand-broadcast operations.** Concentrate baiting in the areas with the heaviest vegetative cover. Do not broadcast bait on bare ground or growing crops. Apply bait at rates from 6-10 pounds per treated acre.

Aerial Application: Broadcast bait at a rate ... growing crops.

SUGARCANE

Use Restrictions: For control of Polynesian rats (*Rattus exulans*), Norway rats (*R. norvegicus*), roof rats (*R. rattus*), rice rats (*Oryzomys palustris*), Florida water rats (*Neofiber alleni*), and cotton rats (*Sigmodon hispidus*) in sugarcane fields.

Prebaiting: Prebaiting with 3 pounds of untreated steamed crimped oats per acre one or two weeks prior to using ZP RODENT OAT BAIT AG may enhance bait acceptance by rats.

Baiting: Broadcast bait by aircraft, or by hand ... acre. **Wear rubber gloves during hand-broadcast operations.** The number of applications ... harvest.

NURSERY STOCK AND CONIFER/CHRISTMAS TREE, POPLAR/COTTONWOOD, ORNAMENTAL, AND NONBEARING FRUIT TREE PLANTATIONS

Use Restrictions: For control of meadow voles, prairie voles, pine voles, California voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.) in nursery stock and conifer/Christmas tree, poplar/cottonwood, ornamental, and non-bearing fruit tree plantations. Do not apply by air.

Broadcast Baiting: Under infested nursery stock, conifer/Christmas trees, poplar/cottonwood trees, ornamental trees, or non-bearing fruit trees, broadcast bait evenly by cyclone seeder or by hand. **Wear rubber gloves during hand-broadcast operations.** Concentrate baiting in the areas with the heaviest vegetative cover. Do not broadcast ... per acre.

Hand Baiting: Near the base of infested nursery stock, conifer/Christmas trees, poplar/cottonwood trees, ornamental trees, or non-bearing fruit trees place teaspoonful quantities (4 g) of bait at 2-4 locations, either on surface trails or at the mouths of holes leading to underground burrow systems. Do not allow ... stock.

GRAPE VINEYARDS

Use Restrictions: For control of deer mice (*Peromyscus maniculatus*), white-footed mice (*P. leucopus*), oldfield mice (*P. polionotus*, except for threatened or endangered subspecies), meadow voles, prairie voles and pine voles (*Microtus* spp.), and meadow jumping mice (*Zapus hudsonius*) in grape vineyards. Do not use this product in areas of Alabama and Florida that are occupied by threatened or endangered subspecies of the oldfield mouse.

Broadcast Baiting: Broadcast bait evenly on the ground between the rows by cyclone seeder or by hand. **Wear rubber gloves during hand-broadcast operations.** Apply baiting at a rate ... by air.

POCKET GOPHERS IN ALFALFA, LAWNS, GOLF COURSES, AND OTHER NONCROP AREAS

Use Restrictions: For control of plains pocket gophers (*Geomys bursarius*), southeastern pocket gophers (*G. pinetis*), yellow-faced pocket gophers (*Pappogeomys castanops*), and *Thomomys* spp. pocket gophers in alfalfa, rangelands, croplands,, lawns, golf courses, parks, forests and reforestation areas, Christmas trees and other conifers, poplar/cottonwood plantations, and other noncrop areas. Bait must be applied directly into pocket gophers' underground burrow systems or into underground tunnels created by burrow-builder machines. Do not apply bait above ground or directly to crops grown for food or feed. Do not apply by use of burrow-builders in lawns, golf courses, or municipal parks

Hand Baiting: Follow the directions indicated below to locate and treat pocket gophers' burrow systems.

Locating Underground Runways: Use a specially designed gopher probe, a metal rod, a strong smooth stick, or other suitable implement to probe the ground 10 to 15 inches away from fan-shaped gopher mounds. Begin probing on the flat side of the fan. When the main runway has been entered, the probe will drop about 2 inches due to decreased resistance from soil.

Applying Bait to Runways: Using a long-handled spoon or mechanical probe, drop one teaspoon (4 grams) of bait into main runway at each baited point. Cover the opening with sod, a rock, or soil to exclude light. Take care not to cover bait with soil. Depending on mound density, make two to five bait placements per burrow system. Recover and bury all spilled pellets. Applied in this manner, one pound of bait will treat one to eight acres, depending upon the number of pocket gopher burrow systems present.

Burrow Builder: Follow manufacturer's instructions for they type of equipment used. Calibrate equipment to drop a teaspoon quantity (4 grams) of bait at 4- to 5-foot intervals in the artificial burrow made by the machine. Apply at rates of 2-3 pounds of bait per acre. Pick up and bury all spilled bait.

ALFALFA

Use Restrictions: For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.) and Richardson's ground squirrels (*Spermophilus richardsonii*) in alfalfa. All applications must occur shortly after a cutting of hay and/or prior to the next growth's attaining a length of 2 inches. Alfalfa forage ... Washington.

Prebaiting: When bait is to be used to control Richardson's ground squirrels, prebaiting with untreated steamed crimped oats at a rate of 6 pounds per acre 2-3 days before ZP RODENT OAT BAIT AG is applied is likely to enhance acceptance of the toxic bait.

Broadcast Baiting: This product may be broadcast by air or ground-driven dispensing devices. Apply at rates of up to 10 lbs (0.2 lbs active ingredient) per acre. Make only one application per

year if Richardson's ground squirrels are being targeted. If voles are being targeted, a second bait application may be made after 10 days. A maximum of 20 lbs of bait (0.4 lbs active ingredient) per acre may be applied per year. Do not apply by ... equipment.

TIMOTHY AND TIMOTHY/ALFALFA AND MIXTURES PRODUCED FOR HAY

Use Restrictions: For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.) in timothy and timothy/alfalfa mixtures. Do not apply by air. Do not apply ... days of harvest.

Broadcast Baiting: Broadcast bait using by hand, cyclone seeder, or ground-driven dispensing devices. **Wear rubber gloves during hand-broadcast operations.** A maximum of ... equipment.

TIMOTHY PRODUCED FOR SEED

Use Restrictions: For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.) in timothy during the non-growing season. Do not apply by air. Do not apply ... state of Washington.

Broadcast Baiting: This product may be broadcast by hand, cyclone seeder, or ground-driven dispensing devices at rates of up to 10 lbs (0.2 lbs active ingredient) per acre during crop dormancy. **Wear rubber gloves during hand-broadcast operations.** A maximum of 20 lbs (0.4 lbs active ingredient) per acre may be applied annually.

BARLEY

Use Restrictions: For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.) and Richardson's ground squirrels (*Spermophilus richardsonii*) in growing-season and preplant applications in barley. Do not apply this product to barley within ... Washington.

Prebaiting: When bait is to be used to control Richardson's ground squirrels, prebaiting with untreated steamed crimped oats at a rate of 6 pounds per acre 2-3 days before ZP RODENT OAT BAIT AG is applied is likely to enhance acceptance of the toxic bait.

Broadcast Baiting: This product may be broadcast by air or ground-driven dispensing devices. Apply bait at a rate of up to 6 lbs (0.12 lbs active ingredient) per acre. Make only one application per year if Richardson's ground squirrels are being targeted. If voles are being targeted, a second bait application may be made after a minimum interval of 25 days. A maximum of 12 lbs (0.24 active ingredient) per acre may be applied per year. All applications must be made prior to the boot stage.

POTATOES

Use Restrictions: For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.) in growing-season and preplant applications in potatoes. Do not apply this product to potatoes within ... Washington.

Broadcast Baiting: This product may be broadcast by air or ground-driven dispensing devices. Apply bait once at a rate of up to 10 lbs (0.2 lbs active ingredient) per acre, or make two separate applications at rates of up to 5 lbs (0.1 lb active ingredient) per acre. The maximum application rate per year is 10 lbs (0.2 lbs active ingredient).

SUGAR BEETS

Use Restrictions: For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.) in growing-season and preplant applications in sugar beets. Do not apply this product to sugar beets within ... Washington.

Broadcast Baiting: This product may be broadcast by air or ground-driven dispensing devices. Apply bait at rates of up to 10 lbs (0.2 lbs active ingredient) per acre at planting. A second application may be made at this same rate. The maximum application rate per year is 20 lbs (0.4 lbs active ingredient).

WHEAT

Use Restrictions: For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.) and Richardson's ground squirrels (*Spermophilus richardsonii*) in growing-season and preplant applications in wheat. Do not apply this product to wheat within ... Washington.

Prebaiting: When bait is to be used to control Richardson's ground squirrels, prebaiting with untreated steamed crimped oats at a rate of 6 pounds per acre 2-3 days before ZP RODENT OAT BAIT AG is applied is likely to enhance acceptance of the toxic bait.

Broadcast Baiting: This product may be broadcast by air or ground-driven dispensing devices. Apply bait at a rate of up to 6 lbs (0.12 lbs active ingredient) per acre. Make only one application per year if Richardson's ground squirrels are being targeted. If voles are being targeted, a second bait application may be made within 25 days. The maximum application rate per year is 12 lbs (0.24 lbs active ingredient) per acre.

BEANS (DRY)

Use Restrictions: For control of prairie voles (*Microtus ochrogaster*), meadow voles (*M. pennsylvanicus*), house mice (*Mus musculus*); deer mice (*Peromyscus maniculatus*), white-footed mice (*P. leucopus*), and Ord's kangaroo rats (*Dipodomys ordii*) in dry beans during the growing season. Do not apply by air. Do not apply ... Washington.

Broadcast Baiting: This product may be broadcast by hand or ground-driven dispensing devices at a rate of 6 lbs (0.12 lbs active ingredient) per acre. **Wear rubber gloves during hand-broadcast operations.** No more ... is permitted.

BUSHBERRIES AND CANEBERRIES

Use Restrictions: For control of meadow voles, prairie voles, and pine voles (*Microtus* spp.) in bushberries (highbush and lowbush blueberries, currants, elderberries, gooseberries and huckleberries) and in caneberrries (blackberries, red raspberries, black raspberries, loganberries, and cultivars or hybrids of these caneberrries). Only apply this product ... 70 days.

Broadcast Baiting: This product may be broadcast by cyclone seeder or by hand. **Wear rubber gloves during hand-broadcast operations.** When applying by hand, throw tablespoon amounts (12 g) into heavy cover along bushes, rock outcrops, and fence lines. Make up to 2 ... application.

CUCURBITS, REDUCED TILLAGE AND NO-TILL CORN

Use Restrictions: For control of prairie voles (*Microtus ochrogaster*), meadow voles (*M. pennsylvanicus*), house mice (*Mus musculus*); deer mice (*Peromyscus maniculatus*), white-footed mice (*P. leucopus*), thirteen-lined ground squirrels (*Spermophilus tridecemlineatus*), Ord's kangaroo rats (*Dipodomys ordii*), banner-tailed kangaroo rats (*D. spectabilis*), Merriam's kangaroo

rats (*D. merriami*), and cotton rats (*Sigmodon hispidus*) in reduced tillage and no-till corn and in cucurbits, including and limited to chayote, Chinese waxgourd, citron melon, cucumber, gherkin, edible gourd, *Momordica* spp., muskmelon, pumpkin, squash (summer and winter), and watermelon. Only in-furrow treatments are permitted for these crops. Do not broadcast bait. Do not apply this product within the occupied habitats of the endangered species or subspecies of kangaroo rats.

In-furrow Applications: Equipment designed for in-furrow treatments must be used to apply this product in cucurbits, reduced tillage and no-till corn. Make one application pre-planting, or at-planting, at a rate of 4 to 6 pounds of bait per acre. Collect and remove excessive quantities of pellets deposited on surface soil or crop residues during spills or equipment malfunctions.

Insert "CALIBRATION ROW" chart here.

HAND BAITING IN LAWNS, ORNAMENTALS, GOLF COURSES, PARKS and NURSERIES

Use Restrictions: For control of meadow voles, prairie voles, pine voles, California voles, long-tailed voles, Oregon voles, mountain voles, and Townsend's voles (*Microtus* spp.), Columbian ground squirrels (*Spermophilus columbianus*), Richardson's ground squirrels (*S. richardsonii*), thirteen-lined ground squirrels (*S. tridecemlineatus*), and California ground squirrels (*S. beecheyi*) in lawns, ornamentals, golf courses, parks, and nurseries. Bait must not be ... feed.

Prebaiting: Prebait by placing one teaspoon (4 grams) of untreated steamed crimped oats around each active burrow opening or in each active runway 2 or 3 days prior to using ZP RODENT OAT BAIT AG to enhance bait acceptance by ground squirrels or voles.

Hand Baiting: Place 4 grams (one teaspoon) of bait around each active burrow opening or in each active runway. Allow bait to fall through to the ground surface but do not apply bait to bare ground. Do not place bait in heaps or piles.

VOLES AROUND AGRICULTURAL AND INDUSTRIAL STRUCTURES

Use Restrictions: This product may be used to control meadow voles (*Microtus pennsylvanicus*), prairie voles (*M. ochrogaster*), California voles (*M. californicus*), mountain voles (*M. montanus*), and pine voles (*M. pinetis*) around (within 15 feet of) agricultural, commercial and industrial buildings. Do not apply bait inside of structures.

Bait must be placed ... vandalism.

Selection of Treatment Areas: Determine where voles will most likely find and consume the bait. Look for runways near buildings as well as signs of vole activity oriented toward the structures.

Prebaiting: Prebaiting with untreated steamed crimped oats may improve acceptance of this product and encourage voles to enter bait stations. Apply a teaspoon amount (4 grams) of prebait to each bait station at least 2 days before the scheduled application of ZP RODENT OAT BAIT AG. Check bait stations ... toxic bait.

Baiting: Apply a teaspoon (4 grams) of bait in each bait station. Space bait stations ... by voles.

COMMENSAL RATS AND MICE IN AND AROUND BUILDINGS

Important: Do not ... accidents:

1. Store product not ... pets.
2. Apply this bait ... vandalism.

3. Dispose of product ... label.

Use Restrictions: For control of Norway rats (*Rattus norvegicus*), roof rats (*R. rattus*), and house mice (*Mus musculus*) in and around homes, industrial or agricultural buildings, and similar man-made structures. Do not ... broadcast bait.

Selection of Treatment Areas: Determine areas ... bait. Generally, these are along walls, by gnawed openings, in or beside burrows, or in locations where signs of rats or house mice have been seen. Protect bait ... as possible.

Baiting:

Norway Rats and Roof Rats: Apply 1 or 2 teaspoons (4 to 8 grams) of bait per placement. Space placements in suitable locations at intervals of 15 to 30 feet in infested area. Monitor bait placements frequently. Remove bait within 3 days after the last observed evidence of new feeding on it by rats.

House Mice: Apply 1 teaspoon (4 grams) of bait per placement. Space placements at intervals of 8 to 12 feet in suitable locations in infested areas. Remove bait within 3 days after the last observed evidence of new feeding on it by house mice.

Follow-up (Rats and Mice): Recover and properly dispose of spilled bait immediately. Recover and dispose of used bait after target species cease feeding on it. Collect and dispose of dead animals properly. To discourage reinfestation, limit sources of rodent food, water, and harborage as much as possible. Do not use this bait again at the same premises for at least 30 days.

AIRPORTS

Use Restrictions: This product may be used at airports to control meadow voles (*Microtus pennsylvanicus*), prairie voles (*M. ochrogaster*), California voles (*M. californicus*), mountain voles (*M. montanus*), pine voles (*M. pinetis*), and white-footed mice (*Peromyscus leucopus*). Do not apply bait ... by air.

Prebaiting: Prebaiting with untreated steamed crimped oats may improve acceptance of this product. Apply prebait at the same rate and using the same procedures that are to be used for applying the toxic bait. Apply prebait 2 or 3 days before the scheduled application of ZP RODENT OAT BAIT AG.

Hand Baiting: Place a teaspoon (4 grams) of bait in surface runways or at the mouths of holes leading to underground burrow systems.

Ground-broadcast Baiting: Broadcast bait evenly by hand, by cyclone seeder, or by a mechanical spreader mounted on a tractor or 4-wheel all-terrain vehicle (ATV). **Wear rubber gloves during hand-broadcast operations.** Apply treated baits ... once per year.

RESTRICTED USE PESTICIDE
DUE TO HAZARDS TO NONTARGET SPECIES
For retail sale and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.

Continued from Left Column :

Fresno Kangaroo Rat (*Dipodomys nitratoideus exilis*). Follow the Interim Measures for Protecting Endangered Species in the California Endangered Species Bulletin for the following California counties: Fresno, Kings, Madera and Merced.
Stephan's Kangaroo Rat (*Dipodomys stephens*). Follow the Interim Measures for Protecting Endangered Species in the California Endangered Species Bulletin for the following California counties: San Bernardino, San Diego and Riverside.
Aleutian Canada Goose (*Branta canadensis leucoparia*). Do not use this product from October to March in the Federally closed goose hunting areas in the State of California. See current Duck and Goose Hunting game laws for a current map.
Giant Kangaroo Rat (*Dipodomys ingens*). Follow the Interim Measures for Protecting Endangered Species in the California Endangered Species Bulletin for the following California counties: Fresno, Kern, Kings, Merced, Monterey, San Benito, San Luis Obispo, Santa Barbara and Tulare.
Tipton Kangaroo Rat (*Dipodomys nitratoideus nitratoideus*). Follow the Interim Measures for Protecting Endangered Species in the California Endangered Species Bulletin for the following California counties: Kern, Kings and Tulare.
San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*). Follow the Interim Measures for Protecting Endangered Species in the California Endangered Species Bulletin in the following California counties: San Bernardino and Riverside.
TEXAS: Attwater's greater prairie chicken (*Tympanuchus cupido attwateri*). Do not use this product in the present occupied range of the Attwater's prairie chicken in the following Texas counties: Arkansas, Austin, Brazoria, Colorado, DeWitt, Fort Bend, Galveston, Goliad, Harris, Refugio, Victoria, Waller and Wharton.
PUERTO RICO: Yellow-shouldered Black Bird (*Agelaius xanthomus*) and Puerto Rican Plain Pigeon (*Columba inornata wetmorei*). This product must not be used in the following areas except in tamper proof bait boxes: within 10 kilometers of Central Aquirre, Lago Cidra, Ceiba, San German; 15 kilometers of La Esperanza, south of Highway 2 from city of Mayaguez to the city of Ponce and all Mona Island.
NOTICE: It is a federal offense to use any pesticide in a manner that results in the death of a member of an endangered species. The use of this product may pose a hazard to Federally designated endangered/threatened species. Suggested measures to protect endangered species in your county may exist in an EPA "Interim Measures" pamphlet. You may call EPA's Endangered Species Hotline, 1-800-447-3813, to find out if an "Interim Measures" pamphlet exists for your county and have one sent to you. You can also consult your local county extension office or pesticide state lead agency to determine whether they have imposed any requirements in your area to protect endangered and threatened species.

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. Avoid contamination of feed or foodstuffs. Avoid contact with acids. Wash all utensils, spoons, or measuring devices thoroughly after using.

Personal Protective Equipment (PPE)

All handlers, including anyone who applies bait and retrieves carcasses and unused bait, must wear waterproof gloves.

Follow manufacturer's instructions for cleaning/maintaining PPE, such as gloves. If no instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and fish. Birds and other wildlife feeding on treated bait may be killed. Do not apply where runoff is likely to occur. 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.

ENDANGERED SPECIES CONSIDERATIONS

Whooping Crane (*Grus americana*). Do not use this product during the period 30 days prior to arrival and 30 days after the whooping crane leaves known crane habitat.

Pygmy rabbit (*Brachylagus idahoensis*). Do not use this product within one mile of alfalfa fields. Do not use this product within 7 km (4.34 miles) of any prairie dog town to limit risks to the black-footed ferret (*Mustelanimigripes*) from exposure to Zinc Phosphide or destruction of its prey base, unless the colony is: a.) an isolated black-tailed prairie dog town less than 80 acres in size; b.) an isolated white-tailed or Gunnison prairie dog town less than 200 acres in size; c.) has been appropriately surveyed, using methods acceptable to the U.S. Fish and Wildlife Service, and found by the FWS not to be a suitable site for ferret reintroductions; or, d.) has been exempt by the FWS from the survey requirement.

UTAH: Utah Prairie Dog (*Cynomys parvidens*). Do not use this product in the range of the Utah Prairie Dog.

CALIFORNIA: Salt marsh harvest mouse (*Reithrodontomys raviventris*). Do not use this product within 1/2 mile of salt marsh vegetation and/or brackish water wetlands which are located near or adjacent to San Pablo Bay and San Francisco Bay. Do not use this product within 1/2 mile of salt marsh vegetation and/or brackish water wetlands which are located in the Sacramento River below or adjacent to the confluence of the Sacramento River and the San Joaquin River.

Morro Bay Kangaroo Rats (*Dipodomys hurmani morroensis*). Do not use this product within 2 1/2 miles of Bay Wood Park which is located on Morro Bay.

ZP®
RODENT OAT BAIT
AG

FOR CONTROL OF GROUND SQUIRRELS, PRAIRIE DOGS, RATS, VOLES, MICE, MEADOW MICE, DEER MICE, KANGAROO RATS, AND GOPHERS.

ACTIVE INGREDIENT:
Zinc Phosphide;2%
INERT INGREDIENTS98%
TOTAL 100%

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID

Have label with you when seeking 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:

- Call a poison control center or doctor immediately for treatment advice or transport 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

- 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

- 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

- 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.

See Left Column for additional precautions

ACCEPTED NET WEIGHT: _____
with COMMENTS
EPA EST. NO. 12455-WI-1
EPA Letter Date _____
REG. NO. 12455-102

Continued on the Right Column:

FEB 28 2008



Bell Laboratories, Inc.

Madison, WI 53704

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

12455-102

012455-00102.20071206.102-ZP Oats MT Amd 120707 Flow.pdf

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. Do not apply to any site, against any pest, or by any method of application not stated on this label.

Use Restrictions: Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. Keep all other persons out of the treated area during this application.

LIMITATIONS

The following Limitations apply to the Agricultural Areas listed on this label: Product must not be applied on roads, near residential areas, or over water. Do not broadcast over growing crops other than alfalfa, barley, beans (dry), potatoes, sugar beets, sugarcane and wheat. Apply product on warm clear days. Do not graze animals in treated areas.

NONCROP RIGHTS-OF-WAY

USE RESTRICTIONS: For control of California Ground Squirrels (*Spermophilus beecheyi*) on noncrop rights-of-way adjacent to canal and ditch banks and other noncrop borders during late spring and summer. Product must not be applied on roads, near residential areas, over water or where plants are grown for food or feed.

PREBAITING: with 6 pounds of untreated cracked corn per acre, 2-3 days prior to applying toxic bait may enhance acceptance by target species when baiting with acute toxicants.

BAITING: Treat only once during treatment period. Broadcast bait in a 10-15 foot swath along right-of-way, using hand or ground-driven dispensing devices not to exceed 6 pounds per acre. Bait will be applied only to the canal right-of-way between the base of the levee and adjacent properties. The canal and levee will not be treated. Dispose of excess bait from application equipment by burial.

RANGELAND AND ADJACENT NONCROP AREAS

PRAIRIE DOGS

USE RESTRICTIONS: For control of prairie dogs Blacktailed (*Cynomys ludovicianus*), Whitetailed (*C. leucurus*) and Gunnison (*Zuni*) on rangeland in Western United States (North Dakota, South Dakota, Nebraska, Kansas, Oklahoma, Texas, New Mexico, Arizona, Colorado, Montana, Idaho, Utah and Wyoming).

PREBAITING: Prebait with 4 grams (one teaspoon) of untreated cracked corn per mound, one or two days prior to baiting, to increase acceptance of treated baits by prairie dogs.

BAITING: Apply bait only after all or most of prebait is eaten and only to areas where untreated bait was consumed. Establish observation period during prebaiting. Apply bait by hand as a six-inch bait spot on edge of each mound or in adjacent feeding areas. Application rate should not exceed 4 grams (one teaspoon) per bait spot. Treat during mid-summer through mid-winter period (July-January). Do not apply more than one bait application during this period. Dispose of spilled or unwanted bait by burial.

KANGAROO RATS

USE RESTRICTIONS: For control of the Ord's Kangaroo Rat (*Dipodomys ordii*), banner-tailed kangaroo rat (*Dipodomys spectabilis*), and Merriam's kangaroo rat (*Dipodomys merriami*) in rangeland vegetation and noncrop areas.

HAND BAITING: Place one tablespoon (12 grams) of bait at 2 locations on opposite sides of mounds. Attempt to place in feeding runs near the entrance to burrows.

MACADAMIA NUT ORCHARDS AND ADJACENT NONCROP AREAS

USE RESTRICTIONS: For control of roof rats (*R. rattus*) in Macadamia Nut orchards and adjacent noncrop areas.

SPOT TREATMENT: Bait may be placed in bait stations on the ground or in stations in trees. Place 4-8 grams (1-2 teaspoons) of bait in stations at the base of each tree and in each station in trees. Uneaten bait must be removed from trees prior to shaker harvest or from ground prior to mechanized harvest. Orchards may be treated up to 30 days prior to a harvesting round.

BURROW TREATMENT: Place 4-8 grams (1-2 teaspoons) of bait in each burrow. No preharvest interval is required, provided nuts are not retrieved from burrows.

BROADCAST BAITING: Broadcast at the rate of five (5) pounds of bait per acre in orchard using a ground device or by hand. Aircraft may be used to treat adjacent noncrop areas if recommended and supervised by the Hawaii Dept. of Health. The number of applications shall not exceed four (4) per year. The total amount of bait applied shall not exceed 20 pounds per acre per year.

ORCHARDS AND GROVES

USE RESTRICTIONS: For control of meadow voles, prairie voles, pine voles, California voles, long-tailed voles, Oregon voles, mountain voles, Townsend's voles (*Microtus spp.*), California Ground Squirrels (*Spermophilus beecheyi*), Richardson's Ground Squirrels (*Spermophilus richardii*), plains pocket gophers (*Geomys bursarius*), southeastern pocket gophers (*Geomys pinetis*), yellow-faced pocket gophers (*Pappogeomys castanops*) and pocket gophers (*Thomomys spp.*), and white-footed mice in orchards and groves. Apply bait after harvest while the orchard or grove is in a nonbearing phase.

HAND BAITING: Near the base of each infested tree, place teaspoonful quantities of bait at 2-4 locations, either on surface trails or at the mouth of holes leading to underground burrow systems. Cover bait artificially (e.g., mats, boards) or by pulling overhanging grass back into place. Do not allow bait to be exposed on bare ground. Do not disturb the runway system. Bait at the rate of 2-3 pounds per acre of infested trees.

TRAILBUILDER: Drop teaspoonful quantity of bait at 4-5 foot intervals in the artificial trail made by the machine just inside the drop line on both sides of the trees. Apply at the rate of 2-3 pounds per acre.

BROADCAST BAITING: Under infested trees broadcast evenly by cyclone seeder or by hand (wear rubber gloves during hand broadcast operations). Concentrate in areas with the heaviest vegetative cover. Do not broadcast on bare ground or growing crops. Apply at the rate of 6-10 pounds per acre.

AERIAL APPLICATION: Broadcast bait at a rate of 6-10 pounds per acre. Do not apply on bare ground or growing crops.

SUGARCANE

USE RESTRICTIONS: For control of Polynesian (*Rattus exulans*), Norway (*R. norvegicus*), Roof (*R. rattus*), Rice (*Oryzomys palustris*), Florida water (*Neofiber alleri*), and Cotton rats (*Sigmodon hispidus*) in sugarcane fields.

PREBAITING: Prebaiting with three pounds of untreated cracked corn per acre one or two weeks prior to baiting is usually desirable to enhance acceptance of the treated bait by rats.

BAITING: Broadcast bait by aircraft, ground-driven devices, or by hand at the rate of five (5) pounds of bait per acre. The number of applications shall not exceed four (4) per crop. The total application shall not exceed 20 pounds per acre. Do not apply within 30 days of harvest.

NURSERY STOCK, CONIFER/CHRISTMAS TREE, POPLAR/COTTONWOOD, ORNAMENTAL AND NON-BEARING FRUIT TREE PLANTATIONS

USE RESTRICTIONS: For control of meadow voles, prairie voles, pine voles, California voles, long-tailed voles, Oregon voles, mountain voles and Townsend's voles (*Microtus spp.*) in nursery stock, conifer/Christmas tree, poplar/cottonwood, ornamental, and non-bearing fruit trees plantations.

BROADCASTING BAITING: Under infested nursery stock, conifer/Christmas trees, poplar/cottonwood trees, ornamental and/or non-bearing fruit trees broadcast evenly by cyclone seeder or by hand. Concentrate in areas with the heaviest vegetative cover. Do not broadcast on bare ground. Apply at a rate of 6-10 pounds per acre.

HAND BAITING: Near the base of infested nursery stock, conifer/Christmas trees, poplar/cottonwood trees, ornamental and/or non-bearing fruit trees, place teaspoonful quantities of bait at 2-4 locations, either on surface trails or at the mouth of holes leading to underground burrow systems. Do not allow bait to be exposed on bare ground. Do not disturb the runway system. Bait at a rate of 2-3 pounds per acre of infested stock.

GRAPE VINEYARDS

USE RESTRICTIONS: For control of deer mice, white-footed mice, and oldfield mice (*Peromyscus spp.*), meadow, prairie and pine voles (*Microtus pennsylvanicus*) (*Microtus spp.*) and meadow jumping mice (*Zapus hudsonicus*) in grape vineyards. Do not use this product in areas of Alabama and Florida occupied by endangered subspecies of the oldfield mouse.

BROADCAST BAITING: Broadcast bait evenly on the ground between the rows by cyclone seeder or by hand. Apply bait at a rate of 6-10 pounds per acre. Do not apply by air.

ALFALFA, LAWNS, GOLF COURSES, AND OTHER NONCROP AREAS

USE RESTRICTIONS: For control of plains pocket gophers (*Geomys bursarius*), southeastern pocket gophers (*G. pinetis*), yellow-faced pocket gophers (*Pappogeomys castanops*) and pocket gophers (*Thomomys* spp.), in alfalfa, rangelands, croplands, noncrop areas, lawns, golf courses, parks, forests, and reforestation areas, conifer/Christmas trees, and poplar/cottonwood plantations and other noncrop areas. Bait must be applied directly into pocket gopher's underground burrow systems. Do not apply bait above ground or directly to crops grown for food or feed. Do not apply by use of burrow-builders in lawns, golf courses, or municipal parks.

HAND BAITING: Place one teaspoon (4 grams) of bait at 2-4 locations using a mechanical probe or similar device into the underground runway. After bait is dropped into the probe hole, cover the hole. Pick up and bury all spilled bait.

Locating Underground Runways: Use a metal rod, a strong smooth stick or other suitable implement to probe the ground 10 to 15 inches away from fan-shaped gopher mounds. Begin probing on the flat side of the fan. When the main runway has been entered, the probe will drop about 2 inches due to decreased resistance from soil.

Applying Bait to Runways: Using a long-handled spoon or mechanical probe, drop one teaspoon of bait into the main runway at each baited point. Cover the opening with sod, a rock, or soil to exclude light. Take care not to cover bait with soil. Depending upon mound density, make two to five bait placements per burrow system. Recover and bury all spilled bait.

BURROW BUILDER: Drop teaspoonful quantity of bait at 4-5 foot intervals in the artificial burrow made by the machine. Apply at a rate of 2-3 pounds per acre. Pick up and bury all spilled bait.

ALFALFA

USE RESTRICTIONS: For control of voles (*Microtus* spp.) and Richardson's Ground Squirrels (*Spermophilus richardii*) in alfalfa. All applications must occur shortly after a cutting of the hay, and/or prior to the new growth attaining a length of 2 inches. Alfalfa forage from treated areas must not be harvested until it reaches maturity. This use is restricted to Montana, Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground-driven dispensing devices. Apply at a rate of up to 10 lbs. (0.2 lb. active) per acre. A second application may be made after 10 days. A maximum of 20 lbs. (0.4 lb. active) per acre may be applied per year. Do not apply by air when wind velocity exceeds 10 mph. Do not apply in piles or permit piles to be formed by equipment.

TIMOTHY AND TIMOTHY/ALFALFA MIXTURES PRODUCED FOR HAY

USE RESTRICTIONS: For control of voles (*Microtus* spp) in timothy and timothy/alfalfa mixtures. Do not apply by air. Do not apply to actively growing timothy or timothy/alfalfa mixtures. This use is restricted to California, Idaho, Oregon and the state of Washington. Do not apply to timothy or timothy/alfalfa mixtures within 60 days of harvest.

BROADCAST BAITING: Broadcast bait using hand, cyclone seeder, or ground-driven dispensing devices. A maximum of 2 applications by ground may be made at the rate of 5 to 10 pounds per acre, one in the fall after the last cutting and one in the spring when timothy and timothy-legume mixtures are still dormant. Do not apply in piles or permit piles to be formed by equipment.

TIMOTHY PRODUCED FOR SEED

USE RESTRICTIONS: For control of voles (*Microtus* spp.) in growing season. Do not apply by air. Do not apply to actively growing timothy or timothy/alfalfa or timothy/clover mixtures. A minimum of 158 days must pass between an application of ZP Rodent Oat Bait Ag and any livestock foraging activity. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by hand, cyclone seeder, or ground-driven dispensing devices at a rate of up to 10 lbs (0.2 lb active) per acre during crop dormancy. A maximum of 20 lbs (0.4 lb active) per acre may be applied annually.

BARLEY

USE RESTRICTIONS: For control of voles (*Microtus* spp.) and Richardson's Ground Squirrels (*Spermophilus richardii*) in barley, or preplant. Do not apply this product to barley within 50 days of harvest. This use is restricted to Montana, Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground driven dispensing devices. Apply bait at a rate up to 6 lbs (0.12 lb active) per acre. Two applications may be made at a minimum interval of 25 days. A maximum of 12 lbs (0.24 lb active) per acre may be applied per year. All applications must be made prior to the boot stage.

POTATOES

USE RESTRICTIONS: For control of voles (*Microtus* spp.) in potatoes or pre-plant. Do not apply this product to potatoes within 30 days of harvest. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground-driven dispensing devices. Apply bait at a rate up to 10 lbs (0.2 lb active) per acre, or two applications of bait at the rate of up to 5 lbs (0.1 lb active) per acre. The maximum application rate per year is 10 lbs (0.2 lb active).

SUGAR BEETS

USE RESTRICTIONS: For control of voles (*Microtus* spp.) in sugar beets or pre-plant. Do not apply this product to sugar beets within 30 days of harvest. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground-driven dispensing devices. Apply bait at a rate of up to 10 lbs (0.2 lb active) per acre at planting. A second application may be made at this rate. The maximum application rate per year is 20 lbs (0.4 lb active).

WHEAT

USE RESTRICTIONS: For control of voles (*Microtus* spp.), and Richardson's Ground Squirrels (*Spermophilus richardii*) in wheat or pre-plant. Do not apply this product to wheat within 50 days of harvest. This use is restricted to Montana, Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by air or ground-driven dispensing devices. Apply bait at a rate up to 6 lbs (0.12 lb active) per acre. A second application may be made within 25 days. The maximum application rate per year is 12 lbs (0.24 lb active).

BEANS (DRY)

USE RESTRICTIONS: For control of prairie voles (*Microtus ochrogaster*), meadow voles (*M. pennsylvanicus*), house mice (*Mus musculus*); deer mice (*Peromyscus maniculatus*), white-footed mice (*P. leucopus*), thirteen-lined ground squirrels (*Spermophilus tridecemlineatus*), Ord's kangaroo rats (*Dipodomys ordii*), banner-tailed kangaroo rats (*D. spectabilis*), and Merriam's kangaroo rats (*D. merriami*) in dry beans growing season. Do not apply by air. Do not apply this product to dry beans within 30 days of harvest. This use is restricted to Idaho, Oregon and the state of Washington.

BROADCAST BAITING: This product may be broadcast by hand or ground-driven dispensing devices at a rate of 6 lbs (0.12 lb active) per acre. No more than one application per growing season is permitted.

BUSHBERRIES AND CANEBERRIES

USE RESTRICTIONS: For control of meadow, prairie and pine voles (*Microtus* spp.) in bushberries (blueberries [Highbush and lowbush], currant, elderberry, gooseberry and huckleberry) and in caneberrries (blackberry, raspberry [black and red], loganberry, and cultivars or hybrids of these caneberrries). Only apply this product in the dormant season: after final harvest and not later than the beginning of leaf emergence in the spring. Do not apply when ground is snow covered. Do not apply by air. Minimum preharvest interval is 70 days.

BROADCAST BAITING: This product may be broadcast by cyclone seeder, or by hand. When applying by hand (wear rubber gloves during hand broadcast operations), throw tablespoon amounts into heavy cover along bushes, rock outcrops, and fence lines. Make up to 2 applications at a minimum interval of 21 days, at the rate of 6 to 10 pounds per acre per application.

CUCURBITS, REDUCED TILLAGE AND NO-TILL CORN

USE RESTRICTIONS: For control of prairie voles (*Microtus ochrogaster*), meadow voles (*M. pennsylvanicus*), house mice (*Mus musculus*); deer mice (*Peromyscus maniculatus*) white-footed mice (*P. leucopus*), thirteen-lined ground squirrels (*Spermophilus tridecemlineatus*), Ord's kangaroo rats (*Dipodomys ordii*), banner-tailed kangaroo rats (*D. spectabilis*), Merriam's kangaroo rats (*D. merriami*), and cotton rats (*Sigmodon hispidus*) in cucurbits (includes chayote, Chinese waxgourd, citron melon, cucumber, gherkin, edible gourd, *Momordica* spp., muskmelon, pumpkin, squash [summer and winter], and watermelon) and in reduced tillage and no-till corn.

IN-FURROW APPLICATION ONLY: Do not broadcast. Only use equipment designed for In-Furrow delivery and properly adjusted to avoid crushing bait into pieces too small to be effective. Make one application at planting, or pre-planting, at a rate of 4 to 6 pounds per acre. Collect excessive quantities of bait deposited on surface soil or crop residues during equipment malfunction or spills.

CALIBRATION / ROW

Row spaces Inches	4 lbs/A Rate oz. Per 1000 ft	5 lbs / A rate oz. Per 1000 ft	6 lbs / A rate oz. Per 1000 ft
20	2.5	3.1	3.7
30	3.7	4.6	5.5
36	4.4	5.5	6.6
38	4.7	5.8	6.9

HAND BAITING IN NONCROP AREAS:

Such as Lawns, Ornamentals, Golf Courses, Parks and Nurseries

USE RESTRICTIONS: For control of meadow voles, prairie voles, pine voles, California voles, long-tailed voles, Oregon voles, mountain voles and Townsend's voles (*Microtus* spp.), Columbian ground squirrels (*S. columbianus*), Richardson's ground squirrels (*S. richardsonii*), Thirteen-lined ground squirrels (*Spermophilus tridecemlineatus*), and California ground squirrels (*Spermophilus beecheyi*). Bait must not be applied on roads, over water or where plants are grown for food or feed.

PREBAITING with 6 pounds of untreated cracked corn per acre, 2-3 days prior to applying toxic bait has been shown to provide more consistent acceptance by target species when baiting with acute toxicants.

HAND BAITING: Place 4 grams (one teaspoon) of bait around each active burrow or runway, allow bait to fall through grass to ground surface but do not apply to bare ground. Do not place bait in heaps or piles.

AGRICULTURAL AND INDUSTRIAL STRUCTURES

USE RESTRICTIONS: Baits made from this product may be used to control meadow voles (*Microtus pennsylvanicus*), prairie voles (*M. ochrogaster*), California voles (*M. californicus*), mountain voles (*M. montanus*), and pine voles (*M. pinetorum*) around agricultural, commercial, and industrial buildings. Do not apply bait inside of structures.

Bait must be placed in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under 6 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.

SELECTION OF TREATMENT AREAS: Determine areas where voles will most likely find and consume the bait. For voles, look for runways near buildings as well as signs of activity oriented toward the structures.

PREBAITING: Prebaiting with untreated cracked corn may improve acceptance of this product and encourage target species to enter bait stations. Apply a teaspoon amount of prebait to each bait station at least 2 days before the scheduled application of ZP Rodent Oat Bait Ag. Check bait stations for evidence of prebait consumption. Delay use of treated bait until more than half of the prebait offered has been consumed. Remove remaining prebait from bait stations before loading them with toxic bait.

BAITING: Apply a teaspoon of bait in each bait station. Space bait stations at intervals of 8 - 12 feet in infested areas. Maintain bait in stations for 3 days. Extend the baiting period only if there is continued evidence of feeding from the stations by voles.

IN AND AROUND BUILDINGS

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 this 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 (*R. norvegicus*), Roof rats (*R. rattus*), and house mice (*Mus musculus*) in and around homes, industrial, agricultural buildings and similar man-made structures. Do not contaminate food/feed or food/feed handling equipment or place near or inside ventilation duct openings. Do not use in edible product areas or food or feed processing plants, restaurants, or other areas where food or feed is commercially prepared or processed. Do not broadcast 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 or snow. Remove as much alternative food as possible.

BAITING:

RATS: Apply 1 to 2 teaspoon amounts of bait per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days.

MICE: Apply 1 teaspoon amount of bait at 8 to 12 foot intervals. Maintain an uninterrupted supply of fresh bait for at least 15 days.

RATS and 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. Do not treat the same area with product at less than 30 day intervals.

AIRPORTS

USE RESTRICTIONS: Baits made from product may be used to control meadow voles (*Microtus pennsylvanicus*), prairie voles (*M. ochrogaster*), California voles (*M. californicus*), mountain voles (*M. montanus*), pine voles (*M. pinetorum*), and white-footed mice (*Peromyscus leucopus*) at airports. Do not apply bait to bare ground. Do not apply bait by air.

PREBAITING: Prebaiting with untreated cracked corn may improve acceptance of ZP Rodent Oat Bait Ag. Prebait should be applied, at rates appropriate for treated baiting, 2 or 3 days before toxic baits are used.

BAITING:

Hand Baiting: Place a teaspoon of bait in surface runways or at the mouths of holes leading to underground burrow systems. Apply bait at rates of 3 to 5 pounds per acre of infested area.

Ground-Broadcast Baiting: Broadcast bait evenly by rubber-gloved hand, by cyclone seeder, or by mechanical spreader mounted on a tractor or 4-wheel all-terrain vehicle (ATV). Apply treated bait at rates from 6 to 10 pounds per acre. Do not broadcast bait on any area at an airport more than once per year.

STORAGE AND DISPOSAL

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

STORAGE: Store only in original container in a cool, dry, well ventilated place inaccessible to children, pets and wildlife. Protect from direct contact with water or excessive moisture. Once opened, do not store bag for prolonged period.

Spills: If container is punctured, repair with tape and use clear overslip bag and securely close.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not reuse empty container. Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration or, if allowed by state and local authorities, by burning. If burned stay out of smoke. Call your Local Waste Agency for any questions on proper disposal.

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.