

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

April 16, 2008

Bell Laboratories  
3699 Kinsman Blvd.  
Madison, WI 53704

300      S-827229  
1165      S-827767

Attention: Mr. John Lublinkhof

**Subject:** ZP® Rodent Oat Bait AG  
EPA Reg. No. 12455-102  
Your amended application of March 4, 2008

**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 two types of label: 1) a Basic Label with all approved uses and 2) a Supplemental Label with uses only for alfalfa, barley, and wheat.

**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. On your "Supplemental Label", add "Label expires October 15, 2009" after "Supplemental Labeling" in the same type size.

**Existing stocks**      Stocks of product with existing labels may be used for eighteen (18) months. After October 15, 2009, you may only sell and distribute the product with the Basic Label approved with this letter and affixed directly to the product package.

**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](mailto:peacock,dan@epa.gov) (by E-Mail).

Sincerely yours,



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

**Enclosure** Enclosure 1. Basic Label, 12455-102  
Enclosure 2. Supplemental Label, 12455-102

**Location** Dan Peacock, Flash Drive, 2gb, P:\Documents\Word, WP, Excel, etc\Zinc Phosphide\12455\12455-102\12455-102, added claims\12455-102, basic label and supplemental label, 4-3-2008.doc

**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 :

**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 (*Mustelanimripes*) 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 heermanni*). Do not use this product within 2 1/2 miles of Bay Wood Park which is located on Morro Bay.

Continued on the Right Column:

**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 INGREDIENTS .....98%  
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.

ACCEPTED

See Left Column for additional precautions with COMMENTS in EPA Letter Dated:

NET WEIGHT: — APR 16 2008

EPA EST. NO. 12455-WI-1  
EPA REG. NO. 12455-102

Under the Federal Insecticide, Fungicide, and Rodenticide Act



Bell Laboratories, Madison, WI 53704

Fresno Kangaroo Rat (*Dipodomys nitratoides 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 stephensi*). 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 leucopareia*). 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 nitratoides nitratoides*). 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.

12455-102

## 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 (for all use patterns):** 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 all agricultural areas and use sites listed on this label: This 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 becheyi*) on noncrop rights-of-way adjacent to canal and ditch banks and other noncrop borders during late spring and early summer. This product must not be applied on roads, near residential areas, over water or where plants are grown for food or feed.

**PREBAITING:** Prebaiting with 6 lbs. of untreated steamed crimped oats per acre one or 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. Broadcast bait in a 10-15 foot swath along right-of-way, using hand or ground-driven dispensing devices not to exceed 6 lbs. per 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 excess bait from application equipment by 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 on rangeland in the 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 steam crimped oats 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 IN RANGELAND VEGETATION AND ADJACENT NONCROP AREAS

**USE RESTRICTIONS:** For control of the 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 bait stations on the ground or in stations 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 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 1-2 teaspoons (4-8 grams) 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.*) 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 lbs. per acre of infested trees.

**TRAILBUILDER:** Set equipment to drop one teaspoon quantity (4 grams) 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 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 on bare ground or growing crops. Apply bait at rates from 6-10 lbs. per treated acre.

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

## SUGARCANE

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

**PREBAITING:** Prebaiting with three 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, ground-driven devices, or by hand at the rate of 5 lbs. of bait per acre. **Wear rubber gloves during hand-broadcast operations.** The number of applications shall not exceed 4 per crop. The total application shall not exceed 20 lbs. 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, Oregon voles, mountain voles, and Townsend's voles (*Microtus spp.*) in nursery stock and conifer/Christmas tree, poplar/cottonwood, ornamental, and non-bearing fruit trees plantations. Do not apply by air.

**BROADCASTING 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 in areas with the heaviest vegetative cover. Do not broadcast on bare ground. Apply at a rate of 6-10 lbs. 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 grams) 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 lbs. per acre of infested 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 bait at a rate of 6-10 lbs. per acre. Do not apply 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 gopher's 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 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. 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 the type of equipment used. Calibrate equipment to drop a teaspoon quantity (4 grams) of bait at 4-5 foot intervals in the artificial burrow made by the machine. Apply at a rate of 2-3 lbs. 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 the hay, and/or prior to the next growth's 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, California, Idaho, Oregon, and the state of 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 lbs. 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 a rate of up to 10 lbs. (0.2 lb. 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. (0.4 lb. active ingredient) 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 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 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 by hand, cyclone seeder, or ground-driven dispensing devices. **Wear rubber gloves during hand-broadcast operations.** A maximum of 2 applications by ground may be made at the rate of 5 to 10 lbs. 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 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 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 rates of up to 10 lbs (0.2 lb active ingredient) per acre during crop dormancy. **Wear rubber gloves during hand-broadcast operations.** A maximum of 20 lbs (0.4 lb 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, 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 50 days of harvest. This use is restricted to Montana, Idaho, Oregon and the state of Washington.

**PREBAITING:** When bait is used to control Richardson's ground squirrels, prebaiting with untreated steamed crimped oats at a rate of 6 lbs. 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 up to 6 lbs. (0.12 lb 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 lb 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 pre-plant applications in potatoes. 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 once at a rate up to 10 lbs (0.2 lb 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 lb 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 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 rates up to 10 lbs. (0.2 lbs. active ingredient) per acre at planting. A second application may be made at the same rate. The maximum application rate per year is 20 lbs (0.4 lb. active ingredient).

### WHEAT

**USE RESTRICTIONS:** For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, 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 50 days of harvest. This use is restricted to Montana, Idaho, Oregon and the state of Washington.

**PREBAITING:** When bait is used to control Richardson's ground squirrels, prebaiting with untreated steam crimped oats at a rate of 6 lbs. 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 lb. 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 application may be made within 25 days. The maximum application rate per year is 12 lbs. (0.24 lb. 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 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. **Wear rubber gloves during hand-broadcast operations.** No more than one application per growing season 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 caneberries (blackberries, red raspberries, black raspberries, loganberries, and cultivars or hybrids of these caneberries). 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. Wear rubber gloves during hand-broadcast operations. When applying by hand, throw tablespoon amounts (12 grams) 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 lbs. 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 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 APPLICATION ONLY:** 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 lbs. of bait per acre. Collect and remove excessive quantities of bait deposited on surface soil or crop residues during spills or equipment malfunctions.

### 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 LAWN, 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 applied on roads, over water or where plants are grown for food or 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 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 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 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 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 (4 grams) 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.

## COMMENSAL RATS AND MICE 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 or 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 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 from rain or snow. Remove as much alternative food as possible.

### BAITING:

**Norway Rats and Roof Rats:** Apply 1 to 2 teaspoons (4-8 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 to bare ground. 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 mechanical spreader mounted on a tractor or 4-wheel drive all-terrain vehicle (ATV). Wear rubber gloves during hand-broadcast operations. Apply treated bait at rates from 6 to 10 lbs. 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.

022808

**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.

**ZP®**  
**RODENT OAT BAIT**  
**AG**

*FOR ADDITION OF RICHARDSON'S GROUND SQUIRRELS*

ACTIVE INGREDIENT:  
Zinc Phosphide; .....2%  
INERT INGREDIENTS .....98%  
TOTAL 100%

**SUPPLEMENTAL LABEL**

EPA EST. NO. 12455-WI-1  
EPA REG. NO. 12455-102

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

APR 16 2008

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

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

**DIRECTIONS FOR USE** 12455-102

**It is a violation of Federal law to use this product in a manner inconsistent with its labeling. READ THE LABEL AFFIXED TO THE BAG OF ZP RODENT OAT BAIT AG BEFORE APPLYING.**

**The labeling must be in possession of the user at the time of application.**

**Use of ZP Rodent Bait AG according to this labeling is subject to the use precautions and limitations imposed by the label affixed to the bag for ZP Rodent Oat Bait AG.**

**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 the hay, and/or prior to the next growth's 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, California, Idaho, Oregon, and the state of 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 lbs. 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 a rate of up to 10 lbs. (0.2 lb. 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. (0.4 lb. active ingredient) 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.



**DIRECTIONS FOR USE (CONTINUED)**

**BARLEY**

**USE RESTRICTIONS:** For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, 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 50 days of harvest. This use is restricted to Montana, Idaho, Oregon and the state of Washington.

**PREBAITING:** When bait is used to control Richardson's ground squirrels, prebaiting with untreated steamed crimped oats at a rate of 6 lbs. 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 up to 6 lbs. (0.12 lb 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 lb active ingredient) per acre may be applied per year. All applications must be made prior to the boot stage.

**WHEAT**

**USE RESTRICTIONS:** For control of meadow voles, long-tailed voles, California voles, Oregon voles, mountain voles, 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 50 days of harvest. This use is restricted to Montana, Idaho, Oregon and the state of Washington.

**PREBAITING:** When bait is used to control Richardson's ground squirrels, prebaiting with untreated steam crimped oats at a rate of 6 lbs. 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 lb. 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 application may be made within 25 days. The maximum application rate per year is 12 lbs. (0.24 lb. active ingredient) per acre.

Manufactured by:



**Bell Laboratories, Inc.**  
Madison, WI 53704