

36029-17

01/11/2007

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 11, 2007

Wilco Distributors, Inc.
P.O. Box 291
Lompoc, CA 93438

Attention: Mr. Blake Hazen

Subject Ground Squirrel Bait AG by Wilco
EPA Reg. No. 36029-17 ✓
Ground Squirrel Bait by Wilco
EPA Reg. No. 36029-20
Your letter received August 24, 2006
Our telephone conversation of October 23, 2006
Your amended application of November 30, 2006
Your amended formula of January 11, 2007

Purpose The purpose of these submissions is to revise your label to clarify the type of tamper-resistant bait station to use with these products, to add additional states where the pests have been found, and to revise your Confidential Statement of Formula (CSF).

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 changes, before you ship your product.

1. Follow the "Minimum Type Size Requirements for Final Printed Labels" in Enclosure 2. Among other requirements, no text may be smaller than 6 Point. Parts of your "First Aid" and "Note to Physician or Veterinarian" texts do not comply.
2. As currently formatted, your Front Panel precautionary statements are difficult to follow. We suggest that you clarify this important text by following Enclosure 3.

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


CSF In accordance with our Notices of Registration of March 29, 2006, you submitted revised CSFs, dated January 11, 2007. We found these CSFs to be acceptable. All others are obsolete. You may only sell product that is identical to these CSFs.

Special Local Needs According to our Notice of Registration of March 29, 2006, for EPA Reg. No. 36029-17, submit a request for cancellation of the two (2) Special Local Need (SLN) registrations (CA-030006 and NV-040007).

Consequence for non-compliance If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Questions If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock,dan@epa.gov (by E-Mail).

Sincerely yours,



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

Enclosures

1. Stamped label
2. Minimum Type Sizes of Final Printed Labels
3. Suggested Format for Front Panel Precautionary Labeling, 36029-17 and -20.

Location Dan Peacock, Flash Drive, 1gb, K:\Diphacinone\36029, Wilco\36029-17, -20\36029-17, 36029-20, 1-11-2007, ver 2.doc

Enclosure 3. Suggested Format for Front Panel Precautionary Statements, EPA Reg. Nos. 36029-17 and -20¹

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID	
Have label with you when obtaining treatment advice.	
If swallowed	<ul style="list-style-type: none"> •Call a poison control center, doctor, or 1-800-858-7378¹ immediately for treatment advice. •Have person sip a glass of water if able to swallow. •Do not induce vomiting unless told to do so by the poison control center or doctor.
¹ The National Pesticide Telecommunications Network (NPTN) answers questions on medical emergencies, pesticide incidents,, and health concerns.	
NOTE TO PHYSICIAN OR VETERINARIAN	
Contains diphacinone, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans, dogs, or other animals that have ingested this product or have obvious poisoning symptoms (bleeding) or elevated prothrombin times, give Vitamin K ₁ intramuscularly or orally. Check prothrombin time until values return to normal.	

See Left Side Panel for additional precautionary statements.

¹ All text must be at least 6 Points.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

PRECAUTIONARY STATEMENTS JAN 1
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
CAUTION

May be harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Keep away from humans, domestic animals, pets, and birds from feed or foodstuffs. Wear waterproof gloves when handling and retrieving carcasses. Wash thoroughly with soap and water after handling bait.

ENVIRONMENTAL HAZARDS

This product is toxic to mammals, birds, and fish. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wastewater or rinsate.

ENDANGERED SPECIES CONSIDERATIONS

NOTICE: It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. Use of this product may pose a hazard to endangered or threatened species. Before applying this product, applicators must obtain information regarding the occurrence of endangered species and use limitations for this product. You may call EPA's "Endangered Species Hotline" at 1-800-447-3813 to obtain an "Interim Measures" pamphlet for your county. You may also consult your local agricultural extension office or state pesticide lead agency to determine if there are any requirements for use of this product.

In California, obtain a copy of the Interim Measures Bulletin for your county from the County Commissioner's office or from the following internet site: <http://www.cdpr.ca.gov/docs/es/index.htm>

Where necessary to protect endangered kangaroo rats, use in tamper-resistant bait stations (like Wilco Ground Squirrel Bait Stations) developed for this purpose in association with the California Department of Food and Agriculture and the California Department of Fish and Game. A publication on those stations is available at the website indicated above.

STORAGE AND DISPOSAL

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

STORAGE: Store only in original closed container in a cool, dry place inaccessible to children and pets. Store separately from fertilizer and away from products with strong odors which may contaminate the bait and reduce acceptability. Carefully sweep up and dispose of any spillage as in the "PESTICIDE DISPOSAL".

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

CONTAINER DISPOSAL: Completely empty drum or canister by shaking and taping sides and bottom to loosen clinging particles. Empty residue into bait station or dispose of as indicated above. Then dispose of drum or canister in a sanitary landfill or by incineration if allowed by local authorities.

NOTICE: 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.

RESTRICTED USE PESTICIDE

Due to Hazard to Nontarget Organisms
For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.

Under the Federal Insecticide, Fungicide, and Rodenticide Act



GROUND
SQUIRREL
BAIT
by
WILCO
AG

For use around buildings to control California and Townsend Ground Squirrels in California, Nevada, Oregon, Washington, Idaho, and Utah only. Ground Squirrel Bait by Wilco is actually impregnated by the toxicant.

Active ingredient:
Diphacinone (CAS# 82666) 0.005%
(2-Diphenylacetyl 1-1, 3 Indandione) ... 99.995%
Other ingredients 99.995%
Total 100.00 %

KEEP OUT OF REACH OF CHILDREN
CAUTION
FIRST AID

Have label with you when obtaining treatment advice.

If swallowed	• Call a poison control center, doctor or 1-800-858-7378 immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor.
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The National Pesticide Telecommunications Network (NPTN) answers questions on medical emergencies, pesticide incidents, and health concerns.

NOTE TO PHYSICIAN OR VETERINARIAN

Contains diphacinone, an anticoagulant. If swallowed this material may reduce the clotting ability of the blood and cause bleeding. For humans, dogs, or other animals that have ingested this product or have poisoning symptoms (bleeding) or elevated prothrombin times, give vitamin K1 intramuscularly or orally. Check prothrombin times until values return to normal.

See left side panel for additional precautionary statement.

WILCO DISTRIBUTORS, INC.
P O BOX 291 - LOMPOC CA 93438
PH# 805-735-2476 EPA ESTB. NO.: 36029-CA-01
EPA REG NO: 36029-17

NET WT. 20 LBS.

50207

DIRECTIONS FOR USE

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

READ THIS LABEL: Read this entire label and follow all use directions and use precautions.

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

1. Store product not in use in a location out of reach of children, pets, and livestock.
2. Apply this product in secured, tamper-resistant bait stations, (like Wilco Ground Squirrel Bait Stations). These stations must be resistant to destruction by dogs and by children under six years of age, and must be constructed and used in ways which prevent such children from reaching into bait compartments and obtaining bait. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears, other potentially destructive animals, or in areas prone to vandalism. Stations must be secured so that they cannot be overturned by young children, pets, or winds. Stations used in areas open to livestock and/or nontarget wildlife must be secured so that the units cannot be readily overturned by any nontarget animals that have access to them.
3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS: For use only around buildings, in noncrop areas (such as a long levees and ditch banks, along fence lines), in rangeland and pasture land, and in crop areas (such as orchards) to control California and Townsend Ground Squirrel in California, Nevada only in secured, tamper-resistant bait stations (like Wilco Ground Squirrel Bait Stations) to control the California Ground Squirrel (*Spermophilus beecheyi*) and Townsend Ground Squirrel (*Spermophilus townsendi*) in California and Nevada.

Do not apply this product by any method not specified on this label. This product may not be broadcast. Wear waterproof gloves when applying this product. With detergent and hot water, wash all implements used for applying bait. Do not use these implements for mixing, holding, or transferring foods or feed.

APPLICATION DIRECTIONS: Secure bait stations at locations where they will be readily accessible to target ground squirrels, preferably near active burrows. Secure stations 20 to 100 feet apart, depending upon density of the population. Wear waterproof gloves and scooping device (preferably long-handled) to transfer bait from the container to the station. Use 2 to 4 pounds of bait per bait station.

Check bait stations frequently to insure that an uninterrupted supply of bait is always available for at least 15 days or until signs of feeding have stopped.

POST-APPLICATION DIRECTIONS: Using waterproof gloves, collect and burn (where permitted) or bury all visible dead animals. Dispose of leftover bait according to "Pesticide Disposal"

KEEP AWAY FROM FOODSTUFFS

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1-11-2007