

25 AUG 1983

Gametrics Limited
180 Harbor Drive
Sausalito, CA 94965

Gentlemen:

Subject: Epibloc
EPA Registration No. 42882-1
Your Letters of January 10, January 12, and February 22, 1983

The labeling received with your January 10, 1983 letter, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, subject to the comment below.

1. Add the word "CAUTION" before "Keep Out of Reach of Children."

If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of this condition.

A stamped copy of the label is enclosed for your records.

With respect to your January 12, 1983 letter, we have the following comments:

Claims made for a registered pesticide should not exceed those which have been demonstrated as valid for the product. In addition to the claims made on the product label, advertising claims should be supported by valid experimental evidence.

Absolute claims such as "NO POPULATION REBOUND" and "NO SECONDARY POISONING" are proven false by a single contrary observation. In the case of population rebound, there is ample evidence in our files to disprove the absolute statement. In the case of secondary poisoning, the available information is consistent with the claim. A statement to the effect that there was no secondary poisoning of dogs, cats, or pigs observed in laboratory studies with these species could be used in advertising the product.

While the statement that alpha-chlorohydrin's male chemosterilant property may have "no practical value" may have been overly strong, review of efficacy data cited does not indicate support for any claim beyond a statement that

CONCURRENCES

SYMBOL ▶								
SIGNATURE ▶								
DATE ▶								

some males not killed by the bait will be rendered sterile and that this effect may inhibit population rebound under certain conditions. The studies on hand suggest that these conditions are a high initial kill (which is more likely to be obtained with a rebait) and a low likelihood of immigration. These observations notwithstanding, much of the "support" for the chemosterilant claim comes from observations of study authors which go beyond what is shown by the data reported.

With respect to your letter of February 22, 1983, we have the following comments. Claims for control of roof rats are not accepted at this time. Information on file indicates that Rattus rattus is much less sensitive than the Norway rat to both the male chemosterilant and the lethal effects of the compound alpha-chlorohydrin. As a result, the roof rat claim cannot be accepted until the data requirements formerly in force for all new chemicals registered for control of roof rats would apply. These requirements include:

1. One laboratory study using roof rats as target species. The study should follow EPA Protocol 1.209 for acute toxicants (copy enclosed). A second study with a three-day pretoxicant exposure to EPIBLOC prebait and EPA challenge diet could also be run. All males surviving exposure should be examined for epididymal lesions.
2. Two acceptable indoor field studies (each from a different region) demonstrating value of the product in the control of roof rats. At end of each study, rats should be trapped out and examined for epididymal lesions.
3. One acceptable outdoor field study demonstrating value of the product in the control of roof rats. At end of study, rats should be trapped out and examined for epididymal lesions.

Geographical regions in which roof rats are found in the U.S. are the southeast, the southwest and the far west. Guidelines for testing commensal rodenticide baits have been developed by the Agency (copy enclosed). We suggest that you complete the laboratory studies, and, if promising, then apply for an experimental use permit.

Please contact us if questions arise.

Sincerely yours,

William H. Miller
Product Manager (16)
Insecticide-Rodenticide Branch
Registration Division (TS-767)

Enclosures: 1. stamped labels
2. guidelines

EPIBLOC
RODENTICIDE



PESTCON
SYSTEMS, INC.

EPIBLOC
RODENTICIDE

PHARMACEUTICAL TREATMENT

ACCEPTED
with COMMENTS
to EPA Letter Dated

AUG 25 1983

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

142882-1

BEST AVAILABLE COPY



2221 POPLAR BLVD. BOX 469, ALHAMBRA, CALIF. 91802 (213) 283 2761 TELEX 658635

Dear EPIBLOC rodenticide User:

Thank you for your purchase of EPIBLOC rodenticide. Because EPIBLOC rodenticide offers a new concept in rodent control, namely the toxicant-sterilant, we are furnishing you with an EPIBLOC rodenticide training guide to read prior to use. This training guide, found on the back side of this letter, is to be used "in addition to" label use directions and not as a substitute for them.

We would like to emphasize the census prebait program. Not only will it improve bait acceptance; but it will help in determining the activity levels of rodents, the population of rodents in the area that you are trying to control and the proper amount of bait to be placed at each location to obtain control.

We know that some object to making return trips to a site to replenish bait or to run a prebait program. Such return trips are a necessary part of rodenticide use, however. Because EPIBLOC rodenticide is used a maximum of four times per year, even with a prebait program the total number of trips may be less than with some other rodenticides.

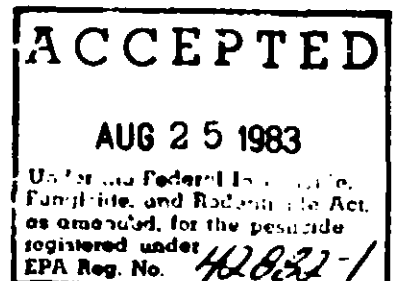
The guidelines in the training guide are explicit. If all the steps are followed, excellent results can be expected.

If you have any questions after reading the training guide, please contact your distributor or your Pestcon Systems, Inc. representative prior to use of the product.

Sincerely yours,

Pestcon Systems, Inc.
P.O. Box 469
Alhambra, CA 91802
(213) 283 2761

Pestcon Systems, Inc.
P.O. Box 3248
Shiremanstown, PA 17011
(717) 737-2962



TRAINING GUIDE FOR THE PROPER USE OF EPIBLOC RODENTICIDE

1. If area has never been baited, prebaiting can begin immediately. If area has been baited with another rodenticide, this should be removed for at least one week before prebaiting begins.
2. Determine areas where rat's signs are observed, i.e., burrows, runways, chewings and nestings. If sewers are to be treated; manholes, trunklines, tributaries and sewer line junctions are to be prebaited.
3. After areas are established, place two to four, twenty-five gram pre-census bait sachets per site. Dosage will depend on the size of the burrow or the activity level that exists at each site.
4. Check pre-census bait consumption after twenty-four hours. Record amount taken at each site. If all the pre-census bait has been taken, replace the pre-census bait at double the original amount. For example, if on the first day 50 grams of pre-census bait are placed, and after 24 hours, 50 grams of pre-census bait have been taken, replace with 100 grams of pre-census bait. Keep a record of the amount of bait you have replenished.
5. Check the pre-census bait consumption after forty-eight hours. Record the amount of pre-census bait taken at each site. Pick up all remaining pre-census bait. For every twenty-five grams (1 sachet) of pre-census bait taken place three EPIBLOC sachets. For example, if on the first day 50 grams (2 sachets) of pre-census bait are placed, and after 24 hours 50 grams (2 sachets) of pre-census bait have been taken, replace with 100 grams (4 sachets) of pre-census bait. Or, if after 48 hours, 150 grams of pre-census bait have been taken, place 18 sachets of EPIBLOC. For example:
$$150 \text{ g} \div 25 \text{ g} = 6 \text{ Pre-census sachets consumed}$$
$$6 \times 3 = 18 \text{ EPIBLOC sachets to be placed}$$
6. After 24 hours check amount of EPIBLOC rodenticide taken and record amount. If all the EPIBLOC rodenticide is gone, replace the original amount. For example, if 24 sachets have been placed, and after 24 hours 24 sachets are gone, replace with 24 sachets. If more than half of the sachets are gone, replace what has been taken. For example, if 24 sachets have been placed, and after 24 hours 15 sachets are gone, replace with 15 sachets. If less than half are taken do not replace. Record the amount of EPIBLOC sachets replenished.
7. Leave bait for 6 to 10 days. At the end of this period, pick up all remaining EPIBLOC sachets and dispose of them in the proper manner.

**EPIBLOC
RODENTICIDE**

Active Ingredient:

Alpha-chlorhydrin

(3-chloro-1, 2-propanediol)

Keep out of reach of children

CAUTION

PRACTICAL TREATMENT

If Swallowed, call a physician or
Poison Control Center. Drink 1 or
2 glasses of water and induce
vomiting. Do not induce vomiting
or give anything by mouth to an
unconscious person.

If on skin, wash affected area with
soap & water. If in eyes, flush
thoroughly with water.

DIRECTIONS for USE - Read main label

NOT REVIEWED

In Accordance with PR Notice 82-2.
Based on Draft Labeling Dated 8/25/87

BEST AVAILABLE COPY



RESTRICTED USE PESTICIDE

EPIBLOC RODENTICIDE

EPA REG NO 42882-1-5857
EPA EST NO 36029-CA-01

CONTENTS: 5 GRAMS
DISTRIBUTED BY:



**PESTCON
SYSTEMS, INC.**

PO BOX 68 • ALHAMBRA CALIF 91801
(213) 283-2781

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EPIBLOC

RODENTICIDE

*Reprinted from June 1983
issue of Pest Control
Magazine. Permission granted
by Harcourt Brace
Jovanovich.*

Epibloc[®] (alpha-chlorohydrin) introduces a new form of rodenticide for long-term rodent control — the toxicant steriant. In field tests, it has demonstrated its potency in killing rats, and in addition, adult male rats ingesting less than a lethal dose can become permanently sterile, thus impeding population rebound. Other important benefits of using Epibloc rodenticide are — species specificity, minimal concern for secondary toxicity, its biodegradable nature, and its ease in handling and application. The introduction of Epibloc rodenticide to the roster of rodenticides provides an alternative to established methods of control. Epibloc should form an integral part of any complete integrated pest management program and should not

be considered a substitute for sanitation and rodent-proofing.

Significant Uses: Epibloc rodenticide bait is individually packaged in easy-to-handle five-gram sachets. It is ideal for application in and around industrial and agricultural buildings, municipal and industrial dumps and sewers, and homes for the control of Norway rats. Epibloc acts as an acute toxicant in the control of rats in addition to controlling their repopulation. Therefore, Epibloc will perform best in those areas that potentially support high densities where long-range control is most important.

Significant Precautions/Restrictions: Epibloc rodenticide is a restricted-use pesticide 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. Epibloc bait sachets must be placed in tamper-proof bait boxes or in locations not accessible

to children, pets, domestic animals or wildlife. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in contact with food. Keep out of any body of water.

Application Tips: A census-prebaiting program is recommended with the use of Epibloc rodenticide to accustom the rats to a new food source and to adequately census the population for density and activity levels. Refer to the label regarding specific application directions for census-prebait sachets and Epibloc bait sachets. Epibloc is individually packaged in five-gram sachets that are easy to handle and distribute. The Epibloc bait sachets are available 50 to a poly bag (10 bags per carton), or in fiber drums of 500 or 3500 sachets. Census-prebait sachets are included in the "poly bag" and 500 "drum" packaging, but when ordering the "3500" drum, it is recommended that a special six-gallon drum of 500 census-prebait sachets be ordered as well.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Keep out of reach of children, pets, domestic animals, and wildlife. Harmful if swallowed. Avoid contact with eyes or skin. In case of contact, wash with water.

RESTRICTED USE PESTICIDE

EPIBLOC

PLACEMENT AROUND BUILDINGS LINE . . .

Determine areas where rats will meet, hide, and consume the bait. Generally, these areas are along walls by ground openings or inside burrows, in corners or concealed places, between floors and walls or in locations where rodents or their signs

