

56228-36

4/15/2011

1 of 4

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

APR 15 2011

Stephanie Stephens
Biological Scientist
USDA APHIS PPD
Environmental and Risk Analysis Services, Unit 149
4700 River Rd.
Riverdale, MD 20737

Dear Ms. Stephens:

Subject: Supplemental Label for Brodifacoum-25W Conservation to
Control and Eradicate Black Rats on Palmyra Atoll
EPA Registration No. 56228-36
Submission Date: February 2, 2011

The proposed labeling referred to above, submitted in connections and registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following requirement:

- A monitoring plan must be submitted to the Agency that includes the monitoring actions prior to, during, and after the implementation of the eradication within one year of completion of the eradication project.

To allow successful restoration of native species to Palmyra Atoll (Palmyra), all rats must be killed. To achieve this goal, the eradication program involves multiple application methods, including aerial broadcast application as well as bait application to tree canopies. These bait application methods will consequently result in accessibility of bait to nontarget species. However, the benefits of the long term goals of protecting and restoring the native species and habitat of Palmyra by removing non-native rats are believed to be justified and outweigh the associated risks involved.

A stamped copy of the label is enclosed for your records. This supplemental label will expire 3 years from July 31, 2011. Please submit one (1) final printed copy for the above mentioned label including the expiration date before releasing the product for shipment. If you have any questions regarding this label, please contact Jennifer Gaines at (703) 305-5967 or via e-mail, gaines.jennifer@epa.gov.

Sincerely yours,

John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

2014

RESTRICTED USE PESTICIDE
DUE TO HAZARDS TO NON-TARGET SPECIES

For retail sale only to: USDA Animal and Plant Health Inspection Service Wildlife Services, U.S. Fish and Wildlife Service, and the U.S. National Park Service to be used only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicators certification

ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 APR 15 2011

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

SUPPLEMENTAL LABELING
BRODIFACOUM-25W CONSERVATION

56228-36 For control and eradication of Roof (black) rats on Palmyra Atoll only.

This supplemental label is only for use on Palmyra Atoll and expires on July 31, 2014 and must not be used or distributed after this date.

KEEP OUT OF REACH OF CHILDREN

CAUTION

(EPA REG. NO. 56228-36, EPA Est. No. 056228-ID-1)

THIS SUPPLEMENTAL LABELING AND THE PACKAGE LABELING FOR BRODIFACOUM-25W CONSERVATION (EPA REG. NO. 56228-36) MUST BE IN THE POSSESSION OF THE USER AT THE TIME OF APPLICATION. READ THIS SUPPLEMENTAL LABEL AND THE PACKAGE LABEL BEFORE APPLYING BRODIFACOUM-25W CONSERVATION. ALL APPLICABLE DIRECTIONS, RESTRICTIONS AND PRECAUTIONS ON THIS SUPPLEMENTAL LABEL AND ON THE PACKAGE LABEL MUST BE FOLLOWED.

DIRECTIONS FOR USE

USE RESTRICTIONS:

This supplemental label applies only to the control and eradication of roof rats (*Rattus rattus*) on Palmyra Atoll. The modifications to the label for EPA Reg. No. 56228-36 that this supplemental label allows regarding rates, application directions, and restrictions and limitations apply only to use of this product on Palmyra Atoll.

The maximum amount of bait to be applied under this label to Palmyra Atoll may not exceed 47,000 kilograms (~103,500 lbs). Determination of the final project application rate will be calculated from the total amount of bait applied (lbs or kg) applied via broadcast and canopy baiting to the emergent land area (in acres or hectares) of Palmyra Atoll that is treated via broadcast and canopy baiting during the eradication effort. Areas where bait stations are used are not to be included in these rate calculations, but the 47,000 kg limit on the total amount of bait used includes bait applied in bait stations.

DIRECTIONS FOR USE

CANOPY BAITING (bait placement in the canopy of trees and shrubs): Hand bait tree and shrub canopies that do not receive bait during broadcast applications. These canopies will likely be in areas where the ground was treated by hand broadcast. Bait these habitats using bait bolas, consisting of two biodegradable bags, each bag containing up to 0.9 ounces (25 grams) of bait, tied together by a short length of string. Sling or place bolas into branches and fronds of every stand-alone palm or every third interconnected palm tree per treatment.

BAIT STATIONS: Tamper-resistant bait stations must be used when applying this product to areas in and around human habitation to keep bait out of reach of children, non-target wildlife, or domestic animals. Apply up to 4.2 ounces (120 grams) of bait per bait station. Space bait stations at intervals no greater than 160 ft (50 meters). Deploy bait stations in a grid pattern over the area for which rodent control is desired. Additional bait stations may be deployed inside or on the perimeters of buildings. Check and replenish bait stations at a minimum of every 5 days for the first 20 days of the operation. Bait stations may be left in place for up to 2 years. Bait stations containing bait must be checked for signs of rodent activity and disturbance by other factors at least every 2 weeks.

Maintain an uninterrupted supply of fresh bait for at least 15 days or until signs of rodent activity cease to be evident. Where a continuous source of infestation is present or a risk of re-invasion is high during times of atoll servicing by barges or when large boats or yachts are present, establish permanent bait stations and replenish bait as needed.

BROADCAST APPLICATION:

The primary method of determining application rate will be calculated using data from onboard bait metering software and GPS flight path data [area treated (acres or ha) and total bait applied (lbs or kg)]. Where feasible, use ground-truthing to verify application rate.

Broadcast bait using aircraft, ground-based mechanical equipment, or by gloved hand. Two aerial broadcast applications may be made during the initial eradication attempt. The first application is to be targeted at 71.3 lbs/acre (80 kg/ha) and will not exceed 80.2 lbs of bait per acre (90 kg bait/hectare). The second application, is to be targeted at 66.8 lbs/acre (75 kg/ha) and will not exceed 80.2 lbs/acre (90 kg/ha). Make the second broadcast application, if judged to be necessary, 10 to 14 days after the first application, depending on local weather conditions. The same rates must be used for hand baiting. These application rates have been established to ensure that the entire land mass is treated with sufficient bait to present a minimum of one lethal dose for each rat present (in each potential rat territory), for long enough that rats can find and consume the bait (typically 3-4 days) and to account for substantial loss of bait to terrestrial crabs and other invertebrates, as well as degradation of bait over that time period.

At points where flight lines overlap, the amount of bait applied might locally exceed the prescribed application rate. This could occur along adjacent borders of parallel swaths, at the end of swaths where they intercept the swath created by shoreline baiting, or in areas missed during the initial baiting operations, as indicated by the GPS flight path data. Minimize areas where the allowable application rate is exceeded as much as possible while ensuring that all areas are baited sufficiently.

DIRECTIONS FOR USE, continued:

If bait application to a specific islet is interrupted due to poor weather conditions before completion, "back baiting" of previously baited swaths is permitted to ensure rats that might have reinvaded treated swaths have access to bait. Use the following rules to determine the extent of back baiting.

Application Delay	Resume baiting strategy
1 day	At drop boundary
2-3 days	2-4 swath widths behind the drop boundary (~20-80 m)
≥ 3 days	4-6 swath widths behind the drop boundary (~80-160 m)

Do not make aerial (helicopter) applications in winds higher than 29 mph (25 knots). Pilot in command has final authority for determining safe flying conditions.

Bait abandoned structures at, or within a day of, the time when bait is broadcast to the same land mass. During each of the two bait application periods, hand-apply up to 7.1 ounces (200g) of bait directly into small abandoned structures. For larger structures over 2,500 square feet of inside area, apply up to 1.0 lb per structure in each of two applications. Where bait will not be exposed to ambient climate and might not degrade if unconsumed, place bait so that it can be recovered readily, and disposed of upon conclusion of the project.

For all methods of baiting, monitor the baited area at least twice per week until 3 weeks have passed since the last application and, using gloves, collect and dispose of any dead animals and spilled or spoiled bait properly.