

56228-36

04-04-2012

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

APR 04 2012

Dear Ms. Stephens:

Subject: Supplemental Label for Brodifacoum-25W Conservation to
Control and Eradicate Polynesian and Asian House Rats on Wake Atoll
EPA Registration No. 56228-36
Submission Date: March 6, 2012

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 Wake Atoll, 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 2 years from September 1, 2012. 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,

A handwritten signature in cursive script that reads "Jennifer Gaines for".

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

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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.

SUPPLEMENTAL LABELING
BRODIFACOUM-25W CONSERVATION

*For control and eradication of Polynesian rats (*Rattus exulans*) and Asian house rats (*Rattus tanezumi*) or other invasive rodents on Wake Atoll*

This supplemental label is only for use on Wake Atoll and expires on September 1, 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)

ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 APR 04 2012
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
 56228-36

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 Polynesian rats (*Rattus exulans*) and Asian house rats (*Rattus tanezumi*) or other invasive rodents on Wake Atoll. All modifications to EPA Reg. No. 56228-36 contained in this label apply to the use of this product on Wake Atoll only.

The maximum amount of bait to be applied by broadcast application under this label to Wake Atoll may not exceed 40,728 pounds (18,474 kg). Determination of the final project broadcast application rate will be calculated from the total amount of bait applied via broadcast baiting to the emergent land area of Wake Atoll. In addition, a maximum of 1,499 pounds (680 kg) of bait may be applied in bait stations under this label. In the event rats or rat sign are found after baiting operations, small scale hand broadcast applications are permitted in the area of the evidence in an effort to eliminate the few remaining survivors.

DIRECTIONS FOR USE, continued:

CANOPY BAITING (bait placement in the canopy of trees and shrubs): Hand bait tree and shrub canopies that do not receive bait delivered during broadcast applications. These canopies will likely be in areas treated by bait station or hand broadcast application techniques. 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 4.23 ounces (120 grams) of bait per bait station. Bait stations must be checked weekly and restocked regularly (eight weeks post application, checks will be extended for a maximum of two weeks) to maintain an uninterrupted supply of fresh bait. Place bait stations inside and around all inhabited structures that cannot be treated with hand or aerial broadcast. Space bait stations at intervals no greater than 160 ft (50 meters).

BROADCAST APPLICATION: Broadcast bait using aerial (helicopter) or by gloved hand. Two aerial broadcast applications may be made during the initial eradication attempt. The first application is to be targeted at 16 lbs/acre (18 kg/ha). The second application is to be targeted at 8 lbs/acre (9 kg/ha). The second broadcast application should be timed to maximize the probability of baiting weanling rats that may emerge from the nest after the first application, but will also be dependent 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 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 swaths 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.

If bait application is interrupted due to poor weather conditions, "back baiting" of previously baited swaths is permitted to ensure rats are exposed to the bait. Use the following rules to determine the extent of back baiting.

<u>Application Delay</u>	<u>Resume baiting strategy</u>
1-3 days	At drop boundary
>3 days	2-4 swath widths behind the drop boundary

Do not make aerial (helicopter) applications in sustained winds higher than 35 mph (30 knots). Pilot in command has final authority for determining safe flying conditions.

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DIRECTIONS FOR USE, continued:

Baiting abandoned structures at, or within a day of, the time when bait is broadcast to the same land mass. Abandoned structures, including underground structures such as bunkers and sewers, will be baited by hand broadcast at the same application rates used to treat unenclosed areas. Where bait will not be exposed to ambient climate and may not degrade if unconsumed, bait should be placed such that it can be recovered, 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 broadcast application and, using gloves, collect and dispose of any dead animals and spilled or spoiled bait properly.

**UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
4700 River Road, Unit 149
Riverdale, MD 20737-1237**