

56228-37

09/11/2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Kenneth R. Seeley
USDA APHIS Environmental Services, Unit 149
4700 River Road
Riverdale, MD 20737

SEP 11 2009

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Dr. Seeley:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated August 19, 2009 for:

EPA Registration 56228-36
EPA Registration 56228-37

Brodifacoum 25W Conservation
Brodifacoum 25D Conservation

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label changes requested falls within the scope of PRN-2007-4. The labels have been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me at 703 306-0415 or davis.kable@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)



United States Environmental Protection Agency Washington, DC 20460

Registration Amendment Other (checked)

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number: 56228-36 and 56228-37
2. EPA Product Manager
3. Proposed Classification: Restricted (checked)
4. Company/Product (Name): Brodifacoum 25W and Brodifacoum 25D
5. Name and Address of Applicant: USDA APHIS Environmental Services, Unit 149, 4700 River Road, Riverdale, MD 20737
6. Expedited Review: EPA Reg. No., Product Name

Section - II

Amendment - Explain below. Resubmission in response to Agency letter dated. Notification - Explain below. Final printed labels in response to Agency letter dated. 'Me Too' Application. Other - Explain below. NOTIFICATION SEP 11 2009

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of changes to Storage and Disposal language to comply with Pesticide Registration Notice 2007-4

* Self-certification located on cover letter

Section - III

1. Material This Product Will Be Packaged In: Child-Resistant Packaging, Unit Packaging, Water Soluble Packaging, 2. Type of Container: Metal, Plastic, Glass, Paper, Other (Specify)
3. Location of Net Contents Information: Label, Container
4. Size(s) Retail Container
5. Location of Label Directions: On Label, On Labeling accompanying product
6. Manner in Which Label is Affixed to Product: Lithograph, Paper glued, Stenciled, Other

Section - IV

1. Contact Point: Name: Stephanie Stephens, Title: Biological Scientist, ES, Telephone No.: 435-658-5134
Certification: I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.
2. Signature: Kenneth R. Seeley
3. Title: Chief, Environmental Services
4. Typed Name: Kenneth R. Seeley, Ph.D.
5. Date: 8/19/09
6. Date Application Received (Stamped)



United States
Department of
Agriculture

ENQL 7-1 CY09
PERMANENT
Retire 08/14

Marketing and
Regulatory
Programs

August 19, 2009

Animal and
Plant Health
Inspection
Service

John Hebert
Insecticide-Rodenticide Branch
Registration Division (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave. N.W.
Washington, DC 20460

NOTIFICATION
SEP 11 2009

Policy and Program
Development

Environmental
Services, Unit 149
4700 River Road
Riverdale, MD
20737

**SUBJECT: Notification of Label Change to Comply with PR Notice 2007-4:
Brodifacoum Labels**

Dear Mr. Hebert:

The United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) is hereby submitting materials supporting a notification relating to the following Brodifacoum:

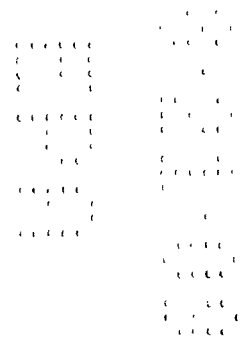
- EPA Reg. No. 56228-36: Brodifacoum 25W Conservation
- EPA Reg. No. 56228-37: Brodifacoum 25D Conservation

The enclosed labels have been revised to incorporate disposal language required by EPA's Pesticide Registration Notice 2007-4. No other changes have been made to the labels.

Attached are the following documents in support of this notification:

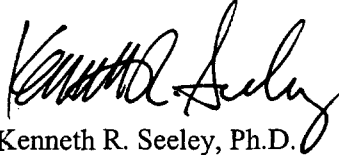
- EPA Form 8570-1;
- Two (2) copies of each of the final printed labels for the Brodifacoum registrations listed above, with the new label language highlighted for your reference.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.



If you have any questions regarding this submission, please contact Stephanie Stephens at (435) 658-5134 or e-mail Stephanie.H.Stephens@aphis.usda.gov.

Sincerely,



Kenneth R. Seeley, Ph.D.
Chief, Environmental Services

Enclosures

CC: [illegible]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. Wear protective gloves when applying or loading bait. With detergent and hot water, wash all implements used for applying bait. Do not use these implements for mixing, holding, or transferring food or feed.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds, mammals and aquatic organisms. Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten bait.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:
-long sleeved shirt and long pants
-gloves
-shoes plus socks

For aerial application, in addition to the above PPE, loaders must wear protective eyewear or a face shield and a dust/mist filtering respirator (MSHA/NIOSH TC-21C).

USE RESTRICTIONS

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. A copy of this label must be in the possession of the user at the time that the product is applied.

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

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

- 1) Keep children out of areas where this product is used or deny them access to bait by use of tamper resistant bait stations.
- 2) Store this product in locations out of reach of children, pets, and other nontarget animals.
- 3) Apply bait only according to the directions authorized.
- 4) Dispose of product container and unused, spoiled, or unconsumed bait as specified in the "STORAGE AND DISPOSAL" section.

(SEE RIGHT PANEL FOR ADDITIONAL USE RESTRICTIONS)

RESTRICTED USE PESTICIDE

DUE TO HAZARDS TO NON-TARGET SPECIES

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 Applicators certification.

For use by or in cooperation with government conservation agencies.

BRODIFACOUM-25D CONSERVATION

PELLETED RODENTICIDE BAIT FOR CONSERVATION PURPOSES

For control or eradication of invasive rodents in dry climates on islands or vessels for conservation purposes

ACTIVE INGREDIENT

Brodifacoum (CAS No. 56073-10-0) 0.0025%

INERT INGREDIENTS 99.9975%

TOTAL 100.0000%

KEEP OUT OF REACH OF CHILDREN CAUTION

First Aid

If swallowed	-Call a physician or poison control center 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. -Do not give anything by mouth to an unconscious person.
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 for treatment advice.
If inhaled	-Move person to fresh air. -If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. -Call a poison control center or doctor for further 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 for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or when going for treatment.

For a medical emergency involving this product, call (877) 854-2494

NOTE TO PHYSICIAN: If swallowed, this material may reduce the clotting ability of blood and cause bleeding. If ingested, administer Vitamin K₁ intramuscularly or orally, as indicated in bishydroxycoumarin overdose. Repeat as necessary based on monitoring of prothrombin times.

USE RESTRICTIONS, (CONT)

This product may be used to control or eradicate Norway rats (*Rattus norvegicus*), roof rats (*Rattus rattus*), Polynesian rats (*Rattus exulans*), house mice (*Mus musculus*) or other types of invasive rodents on islands for conservation purposes, or on grounded vessels or vessels in peril of grounding.

This product may be applied using bait stations, burrow baiting, canopy baiting or by aerial and ground broadcast application techniques.

This product is to be used for the protection of State or Federally-listed Threatened or Endangered Species or other species determined to require special protection.

Do not apply this product to food or feed.

Treated areas must be posted with warning signs appropriate to the current rodent control project.

This product is for use in dry climates.

DIRECTIONS FOR USE

BAIT STATIONS: Tamper-resistant bait stations must be used when applying this product to grounded vessels or vessels in peril of grounding, or when used in areas of human habitation. Bait must be applied in locations out of reach of children, non-target wildlife, or domestic animals, or in tamper-resistant bait stations.

TO BAIT RATS: Apply 4 to 16 ounces (113 to 454 grams) of bait per placement. Space placements at intervals of 16 to 160 ft (about 5 to 50 meters). Placements should be made in a grid over the area for which rodent control is desired.

TO BAIT MICE: Apply 0.25 to 0.5 ounces (7 to 14 grams) of bait per placement. Space placements at intervals of 6 to 12 ft (about 2 to 4 meters). Larger placements, up to 2 ounces (57 grams) may be needed at points of very high mouse activity. Placements should be made in a grid over the area for which rodent control is desired.

FOR BOTH RAT AND MOUSE BAITING: Maintain an uninterrupted supply of fresh bait for at least 15 days or until signs of rodent activity cease. Where a continuous source of infestation is present, permanent bait stations may be established and bait replenished as needed.

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DIRECTIONS FOR USE (CONT.)

BURROW-BAITING: Place bait in burrows only if this can be done in a way that minimizes potential for ejection of bait and exposure of bait non-target species.

TO BAIT RATS: Place 3 to 4 ounces (85 to 113 g) of bait inside each burrow entrance. Baits used in burrows may be applied in piles or in cloth or resealable plastic bags. The bags should be knotted or otherwise sealed to avoid spillage and holes should be made in plastic bags to allow the bait odor to escape.

TO BAIT MICE: Place approximately 0.25 ounces (7 grams) of bait in a cloth or resealable bag in each active burrow.

FOR BOTH RAT AND MOUSE BAITING: Place one such bag or placement in each active burrow opening and push bag into burrow far enough so that its presence can barely be seen. Do not plug burrows. Flag treated burrows and inspect them frequently, daily if possible. Maintain an uninterrupted supply of bait for at least 15 days or until rodent activity ceases. Remove bait from burrows if there is evidence that bags are ejected.

CANOPY BAITING (bait placement in the canopy of trees and shrubs): In areas where sufficient food and cover are available to harbor populations of rodents in canopies of trees and shrubs, canopy baiting should be included in the baiting strategy. Approximately 4 to 7 ounces (113 to 200 grams) of bait should be placed in a cloth or resealable plastic bag. The bags should be knotted or otherwise sealed to avoid spillage and holes should be made in plastic bags to allow the bait odor to escape. Using long poles (or other devices) or by hand, bait filled bags should be placed in the canopy of trees or shrubs. Baits should be placed in the canopy at intervals of 160 ft (about 50 meters) or less, depending upon the level of rodent infestation in these habitats. In some vegetation types, bait stations may need to be used to ensure bait will stay in the canopy.

DIRECTIONS FOR USE (CONT.)

BROADCAST APPLICATION: Broadcast applications are prohibited on vessels or in areas of human habitation. Broadcast bait using aircraft, ground-based mechanical equipment, or by gloved hand at a rate no greater than 16 lbs of bait per acre (18 kg bait/hectare) per application. Make a second broadcast application, typically 5 to 7 days after the first application, depending on local weather conditions, at a rate no higher than 8 lbs. of bait per acre (9 kg bait/hectare). In situations where weather or logistics only allow one bait application, a single application may be made at a rate no higher than 16 lbs. bait per acre (18 kg/ha).

Aerial (helicopter) applications may not be made in winds higher than 35 mph (30 knots). Pilot in command has final authority for determining safe flying conditions. However, aerial applications will be terminated when the following conditions are present:

Windspeed in excess of 25 knots with an evaluation of the terrain and impact of the wind conditions and not to exceed a steady wind velocity of 30 knots.

Set the application rate according to the extent of the infestation and apparent population density. For eradication operations, treat entire land masses.

Assess baited areas for signs of residual rodent activity (typically 7 to 10 days post-treatment). If rodent activity persists, set up and maintain tamper-resistant bait stations or apply bait directly to rodent burrows in areas where rodents remain active. If terrain does not permit use of bait stations or burrow baiting, continue with broadcast baiting, limiting such treatments to areas where active signs of rodents are seen. Maintain treatments for as long as rodent activity is evident in the area and rodents appear to be accepting bait.

For all methods of baiting, monitor the baited area periodically and, using gloves, collect and dispose of any dead animals and spilled bait properly.

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 unauthorized people, children and pets. Store separately from fertilizer and away from products with strong odors, which may contaminate the bait and reduce acceptability. Spillage should be carefully swept up and collected for disposal.

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

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Otherwise, dispose of empty container in sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE: Buyer assumes all risks of use, storage, or handling of the material not in strict accordance with directions given herewith. The efficacy of the product may be reduced under high moisture conditions.

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
Riverdale, MD 20737-1237
EPA Est. No. 56228-ID-1
EPA Reg. No. 56228-37

Net Weight _____

Batch Code No.: _____

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