

56228-37

11/24/2009

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Dr. Kenneth R. Seeley  
USDA APHIS Environmental and  
Risk Analysis Services (ERAS)  
4700 River Rd.  
Riverdale, MD 20737

NOV 24 2009

Dear Dr. Seeley:

Subject: Label Amendment to Change RUP Statement for  
Brodifacoum-25D Conservation  
EPA Registration No. 56228-37  
Submission Date: November 6, 2009

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact Jennifer Gaines at (703) 305-5967.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Hebert", written over a large, stylized circular flourish.

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

**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 INFORMATION)

**ACCEPTED**  
 NOV 24 2009  
 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 56228-37

**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.

**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 the blood and cause bleeding. If ingested, administer Vitamin K<sub>1</sub> intramuscularly 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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