

JAN 26 1999

Judith A. Thompson, Registration Agent
Sweet Corn Products
P.O. Box 487
Bloomfield, NE 68718

Subject: TRAP-N-A-SAK® Kills Rats and Mice
EPA Reg. No. 56637-1
Application for Amended Registration and Revised Labeling dated March 31, 1998

Dear Ms. Thompson:

Your application for amended registration and proposed revised labeling for EPA Reg. No. 56637-1, dated March 31, 1998, have been reviewed. The conclusions of our review are discussed below.

1. As long as the placepack material and bait formulation are not changed, the efficacy data previously accepted for this product remain acceptable and sufficient to support the claims made for it.
2. Your proposed **outer package label** is acceptable **provided** you modify the label as indicated below.
 - a. If it is necessary to split the "**DIRECTIONS FOR USE**" between two label panels, cross-reference at the points where the "**DIRECTIONS FOR USE**" are interrupted and where the section resumes. Cross-references must refer the reader to the appropriate label panels (e.g., "See remainder of **DIRECTIONS FOR USE** on right side panel" and "**DIRECTIONS FOR USE** continued from left panel").
 - b. Change "could" to "would" in the "qualifying" statements for the "2x2x2 oz." and the "3x2x2 oz." containers. Under unusual circumstances, the amount of bait provided might kill more rats than the claimed upper limit, but such a result would not be typical.

- c. The first sentence of the "Rats:" portions of the "APPLICATION DIRECTIONS:" subsection of the "DIRECTIONS FOR USE" must specify use of "2-8 placepacks per placement" regardless of the size of the package. Therefore, the following footnoted text must be deleted from the master label:

"Apply 2 to 8 placepacks, 'The 8 in 8 placepacks' would be changed to represent the amount of placepacks in the package, when less than 8 placepacks, i.e. 4 or 6."

We note that the number of placepacks that a registrant arbitrarily chose to include in a package would have no effect on the amount of bait that might be needed to control the rats which visit any given placement location. For packages containing at least 4 ounces but less than a pound of bait, "qualifying" statements indicate that the amount of bait provided can only be expected to control limited numbers of rats. Those statements enable customers to determine whether they might need to purchase more than one package of bait. This situation differs from that which would occur if the package were smaller than the amount required for a single minimum placement to control rats. In the latter case, the validity of the claim "KILLS RATS" would be called into question, and the product would be considered to be misbranded if the claim appeared on its label.

3. Placepacks which contain only two ounces of Diphacinone bait must not be sold individually unless all claims and directions pertaining to the control of rats are deleted, including any reference to rats in the name of the product. Two ounces of bait is only half of the minimum bait placement amount typically indicated for commensal rat control on labels for anticoagulant baits. Claiming control of rats for a container which supplies too little bait to do the job would be misleading.
4. Your proposed 2-oz. placepack label is acceptable provided you modify the label as indicated below.
 - a. If it is necessary to split the "DIRECTIONS FOR USE" between two label panels, cross-reference at the points where the "DIRECTIONS FOR USE" are interrupted and where the section resumes. Cross-references must refer the reader to the appropriate label panels (e.g., "See remainder of DIRECTIONS FOR USE on right side panel" and "DIRECTIONS FOR USE continued from left panel").
 - b. As the proposed qualifying statement applies only to a packaging arrangement which provides 4 ounces of bait, the asterisked material must

be revised to read as follows:

"*For 2x2 oz. packages (including two placepacks joined together with a hole at the top to slip on a pegboard), the following statement will be added: 'The amount of bait in two placepacks is unlikely to be sufficient to kill more than one or two rats.'"

We note that we have had second thoughts about having agreed to permit registrants to use end-to-end packaging arrangements for placepacks and would prefer that placepacks sold in pairs be packaged in an appropriately-labeled outer container. The revision indicated above accommodates both types of packaging arrangements.

- c. The first sentence of the "Rats:" portions of the "APPLICATION DIRECTIONS:" subsection of the "DIRECTIONS FOR USE" must specify use of "2-8 placepacks per placement".

Stamped copies of the outer package label and the individual 2-oz. placepack label are enclosed for your records. Please submit one copy each of your revised final printed labeling for the outer package and the placepack before you release the product for shipment. We caution you to refrain from adding any claims or directions to the final printed label that were not part of the stamped accepted label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions regarding this letter, please contact me by phone at (703) 305-5417 or via E-mail at Perreault.Peg@epamail.epa.gov.

Sincerely yours,



Peg Perreault
Chemical Manager (Team 4)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosures (2)

TRAP-N-A-SAK
EPA Reg. No. 56637-1
Outer Packaging:
2x2x2 oz.; 3x2x2 oz.; 4x2x2 oz. and larger sizes
Page 1 of 4
March 31, 1998

Outer package label
PAGE 4 OF 70

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

Jan. 26, 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
56637-1

TRAP-N-A-SAK®
KILLS RATS AND MICE

Kills Norway Rats, Roof Rats and House Mice
WITH DIPHACINONE
A PELLETIZED RODENTICIDE
"CONTAINING SWEET CORN"
READY MIXED,

ACTIVE INGREDIENT:

Diphacinone [2-(Diphenylacetyl)- 1,3-indandione]	0.005%
INERT INGREDIENTS	<u>99.995%</u>
TOTAL	100.000%

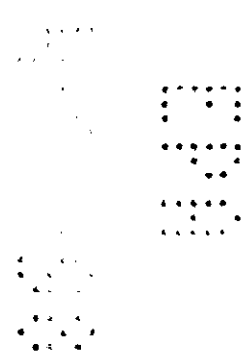
U.S. Patent No. 4,815,923
EPA Reg. No. 56637-1
EPA Est. No. 61282-WI-1

**KEEP OUT OF THE REACH OF CHILDREN
CAUTION**

See Side Panel for Additional Precautions

NET CONTENTS:

Manufactured for:
Sweet Corn Products
Box 487
Bloomfield, NE 68718



TRAP-N-A-SAK

EPA Reg. No. 56637-1

Outer Packaging:

2x2x2 oz.; 3x2x2 oz.; 4x2x2 oz. and larger sizes

Page 2 of 4

March 31, 1998

Left Panel

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

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

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

1. Store product not in use in a location out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and nontarget wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hooved livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container and unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS - For control of Norway rats, roof rats, and house mice in and around homes, industrial and agricultural buildings, and similar man-made structures. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not apply bait directly to ground surface or in grass or other ground cover.

SELECTION OF TREATMENT AREAS - Determine areas where rats or mice will most likely find and consume the bait. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Protect bait from rain or snow. Remove as much alternative food as possible.



TRAP-N-A-SAK
EPA Reg. No. 56637-1
Outer Packaging:
2x2x2 oz.; 3x2x2 oz.; 4x2x2 oz. and larger sizes
Page 3 of 4
March 31, 1998

Right Panel

DIRECTIONS FOR USE (continued)

APPLICATION DIRECTIONS

Rats: Place 2-8 placepacks per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days or until signs of rat activity cease.*

Mice: Open pack and apply 1/4 to 1/2 ounce (1-2 level tablespoons) of bait at 8- to 12-foot intervals. Larger placements (up to one placepack) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days or until signs of mouse activity cease.

Rats/Mice: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and leftover bait properly. To prevent reinfestation, limit sources of rodent food, water and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish as needed.

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 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:

Commercial use: Wastes resulting from the use of this product should be securely wrapped in several layers of newspaper and then disposed of onsite or at an approved waste disposal facility. **Household use:** Securely wrap wastes resulting from the use of this product in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL:

Commercial use: Dispose of empty container in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Household use: Do not reuse container. Wrap container securely in several layers of newspaper and discard in trash.

*For the 2x2x2 oz. size, the following additional statement will be added:
"The amount of bait contained in this package (8 oz.) could not be expected to kill more than two to eight rats."

For the 3x2x2 oz. size, the following additional statement will be added:
"The amount of bait contained in this package (12 oz.) could not be expected to kill more than 3 to 12 rats."

Apply 2 to 8 placepacks, "The 8 in 8 placepacks" would be changed to represent the amount of placepacks in the package, when less than 8 placepacks, i.e. 4 or 6.

TRAP-N-A-SAK
EPA Reg. No. 56637-1
Outer Packaging:
2x2x2 oz.; 3x2x2 oz.; 4x2x2 oz. and larger sizes
Page 4 of 4
March 31, 1998

Right Panel (continued)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

CAUTION: Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding.

NOTE TO PHYSICIAN

If ingested, administer Vitamin K₁ intramuscularly or orally, as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS

This product is toxic to mammals and birds. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

NOTICE OF WARRANTY

Seller and Manufacturer make no warranty of merchantability, fitness for any purpose, express or implied, concerning this product or its use, which extends beyond the statements on this label.

TRAP-N-A-SAK
EPA Reg. No. 56637-1
2 oz.; 2x2 oz.
Page 1 of 3
March 31, 1999

Place pack label
Page 8 of 40

**ACCEPTED
with COMMENTS**
In EPA Letter Dated:
Jan. 26, 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
56637-1

TRAP-N-A-SAK®

KILLS RATS AND MICE

Kills Norway Rats, Roof Rats and House Mice
WITH DIPHACINONE
A PELLETIZED RODENTICIDE
"CONTAINING SWEET CORN"
READY MIXED,

ACTIVE INGREDIENT:

Diphacinone [2-(Diphenylacetyl)- 1,3-indandione]	0.005%
INERT INGREDIENTS	<u>99.995%</u>
TOTAL	100.000%

U.S. Patent No. 4,815,923
EPA Reg. No. 56637-1
EPA Est. No. 61282-WI-1

KEEP OUT OF THE REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K₁ intramuscularly or orally, as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS

This product is toxic to mammals and birds. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

NET WEIGHT: 2 OZS.

Manufactured for:
Sweet Corn Products
Box 487
Bloomfield, NE 68718



TRAP-N-A-SAK
EPA Reg. No. 56637-1
2 oz.; 2x2 oz.
Page 2 of 3
March 31, 1998

PAGE 9 OF 10

Back Panel (Left Side)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

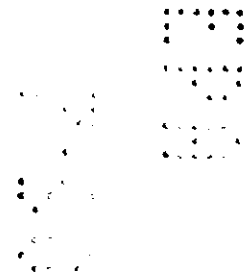
READ THIS LABEL: Read this entire label and follow all use directions and use precautions.

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

1. Store product not in use in a location out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and nontarget wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hooved livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container and unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS - For control of Norway rats, roof rats, and house mice in and around homes, industrial and agricultural buildings, and similar man-made structures. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not apply bait directly to ground surface or in grass or other ground cover.

SELECTION OF TREATMENT AREAS - Determine areas where rats or mice will most likely find and consume the bait. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Protect bait from rain or snow. Remove as much alternative food as possible.



TRAP-N-A-SAK
EPA Reg. No. 56637-1
2 oz.; 2x2 oz.
Page 3 of 3
March 31, 1998

Back panel (right side)

DIRECTIONS FOR USE continued.

APPLICATION DIRECTIONS

Rats: Place 2 placepacks per placement.* Maintain an uninterrupted supply of fresh bait for at least 10 days or until signs of rat activity cease.

Mice: Open pack and apply 1/4 to 1/2 ounce (1-2 level tablespoons) of bait at 8- to 12-foot intervals. Larger placements (up to 1 placepack) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days or until signs of mouse activity cease.

Rats/Mice: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and leftover bait properly. To prevent reinfestation, limit sources of rodent food, water and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish as needed.

*For outer sales packages less than 1 lb. (includes this 2 oz. package and a 2x2 oz. package which will be 2 packets left together with a hole at the top to slip on a pegboard), the following statement will be added: "The amount of bait in this package is unlikely to be sufficient to kill more than one or two rats."

STORAGE AND DISPOSAL

Storage: Store only in original container, in a dry place inaccessible to children and pets.

Disposal: Do not reuse empty container. Securely wrap in newspaper and discard in trash.

NOTICE OF WARRANTY: Seller and Manufacturer make no warranty of merchantability, fitness for any purpose, express or implied, concerning this product or its use, which extends beyond the statements on this label.