

JAN 26 1999

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

Subject: TRAP-N-A-SAK® Bar Bait Kills Rats and Mice
EPA Reg. No. 56637-3
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. 56637-3, dated March 31, 1998, have been reviewed. The conclusions of our review are discussed below.

1. Your application for amended registration, in which you propose to change the size of your bait block product from a scored 4-oz block to a 1-oz block is acceptable **provided** you submit information indicating the dimensions and general appearance of both the proposed 1-oz bait block and the 4-oz block that is currently used for this product. In addition, you must submit a revised description of the product's manufacturing process.
2. Your proposed revised "master" labeling is acceptable **provided** you modify the labeling as indicated below.
 - a.. Adjust the layout of the label so that the "**DIRECTIONS FOR USE**" is not split in the middle of a sentence but, if a split is necessary, at the end of a subsection. 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 panel (e.g., "See remainder of **DIRECTIONS FOR USE** on right side panel" and "**DIRECTIONS FOR USE** continued from left panel). Note that the "**PRECAUTIONARY STATEMENTS**" and "**ENVIRONMENTAL HAZARDS**" sections may appear in the right side panel on labels for commensal rodenticide baits (see format in Pesticide Registration [PR] Notice 94-7).
 - b. Change the "qualifying" statement for the container of six (6) one-ounce bait blocks to read:

"The amount of bait contained in this package would not be expected to kill more than two to five rats."

The other qualifying statements are acceptable except that "could" should be changed to "would". Under unusual circumstances, the amount of toxicant provided might kill more than the claimed

upper limit but would not be expected to do so.

- c. The first sentence of the "Rats:" portions of the "APPLICATION DIRECTIONS:" subsection of the "DIRECTIONS FOR USE" must specify use of "4-16 bait blocks per placement" regardless of the size of the package. Therefore, the following footnoted text must be deleted from the master label:

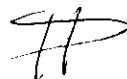
"Apply 4 to 16 Bait Blocks, "The 16 in 16 Bait Blocks" would be changed to represent the size of the package, when less than one lb."

We note that the number of blocks that a registrant arbitrarily decides to include in a package has 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 one 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 could be considered to be misbranded if the claim appeared on its label.

Please submit one copy of your revised final printed labeling before you release the product for shipment. We caution you to refrain from adding any claims or directions to the final printed labeling that were not part of the stamped accepted labeling. 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.

A stamped copy of the label is enclosed for your records. 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)

Enclosure (1)

**PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND
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 overdose. Repeat as necessary based on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS

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.

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 non-target 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 non-target 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 hoofed 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. This product is especially suited for use in wet or damp areas, including river banks, gullies, irrigation ditches, sewers, garbage dumps, and landfills. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact

**TRAP-N-A-SAK Bar Bait
Kills Rats and Mice
Moisture Resistant
KILLS NORWAY RATS, ROOF RATS
and HOUSE MICE
in WET or DRY AREAS**

ACTIVE INGREDIENT:

Diphacinone (2-Diphenylacetyl-1, 3-Indandione)	0.005%
INERT INGREDIENTS:	99.995%
TOTAL	100.000%

KEEP OUT OF THE REACH OF CHILDREN

CAUTION

See side panel for additional cautions.

EPA Reg. No. 56637-3

ACCEPTED
with COMMENTS
in EPA Letter Dated

Manufactured for: *Jan. 26, 1999*
Sweet Corn Products Co.
Box 487
Bloomfield, NE 68201
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
registered under EPA Reg. No. *56637-3*

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

NET CONTENTS: 4 x 1 oz. or 6 x 1 oz. or
8 x 1 oz. or 12 x 1 oz. or
A range in sizes from 16 x 1 oz.
to 100 lbs. (1600 x 1 oz.)
Such as:
24 x 1 oz. (1.5 lbs.)
48 x 1 oz. (3 lbs.)
5 lbs. (80 x 1 oz.)
10 lbs. (160 x 1 oz.)

DIRECTIONS FOR USE (Cont.)

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.

APPLICATION DIRECTIONS: Each bait block in this container weighs approximately one ounce.*

Rats: Apply 4-16 bait blocks per placement (usually at intervals of 15 to 30 feet). Maintain an uninterrupted supply of fresh bait for at least 10 days or until signs of rat activity cease.

Mice: Place one bait block at each placement location. Space placements at 8- to 12-foot intervals. Two bait blocks 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 and Mice: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and remove 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 container, in a dry place inaccessible to children and pets.
PESTICIDE DISPOSAL: Commercial Use - Wastes resulting from the use of this product may be disposed of on site 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 empty container. Securely wrap in newspaper and discard in trash.

*For the 4 oz. size, the following additional statement will be added: "The amount of bait in this package (4 oz.) is unlikely to be sufficient to kill more than one to two rats."

For the 6 and 8 oz. sizes, the following additional statement will be added: "The amount of bait contained in this package could not be expected to kill more than two to eight rats."

For the 12 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 4 to 16 Bait Blocks. "The 16 in 16 Bait Blocks" would be changed to represent the size of the package, when less than one lb.