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SEP 22 1995

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Judith A. Thompson  
HACCO, Inc.  
P.O. Box 7190  
537 Atlas Ave.  
Madison, WI 53707

Subject: PROMAR BAIT PACKS Rat & Mouse Killer (formerly RAMIK RED)  
EPA Reg. No. 61282-6  
Application for Amended Registration and  
Resubmission of Amended Labeling (per PR Notice 94-7) Dated June 19, 1995

Dear Ms. Thompson,

Your application for amended registration, originally submitted January 16, 1995, included a proposed change in the product name from RAMIK RED to PROMAR BAIT PACKS Rat & Mouse Killer as well as a proposed change in the product formulation. A revised Confidential Statement of Formula (CSF) was subsequently submitted on June 19, 1995 which indicates that the new product formulation would be a straight repack of EPA Reg. No. 2393-501. Your revised CSF and proposed product name change are acceptable. Please note that the revised CSF, dated June 19, 1995, supersedes all previous CSFs for EPA Reg. No. 61282-6. The formulation indicated on the June 19, 1995 CSF is now the only registered formulation and formulations listed on previous CSFs are NOT considered alternate formulations.

In addition, we note that EPA Reg. No. 2393-501 is a "loose bait" that will be repacked into 2-oz. placepacks under Reg. No. 61282-6. Placepack penetration data are needed to support the claim for control of mice as well as commensal rats. As indicated in your June 19, 1995 letter, adequate data on placepack penetration by Norway rats are available for a similar product (MRIDs 429785-01 and -02), and you have committed to conduct a study on placepack penetration by house mice which will be submitted within six months.

We have reviewed the amended labeling for the subject product, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act

CONCURRENCES

SYMBOL	7505C						
SURNAME	Renault						
DATE	9/20/95						

P. Renault C:\HACCO\61282-6.ltr

(FIFRA), as amended, and pursuant to PR Notice 94-7. The amended labeling for both the outer and inner (placepack) packages is acceptable provided that you:

1. Modify the "DIRECTIONS FOR USE" section on both the outer package label and individual placepack labels as indicated below.

a. Change the first sentence of the "APPLICATION DIRECTIONS " for "Rats" to read

"Apply 2-8 placepacks per bait placement."

b. Change the first sentence of the "APPLICATION DIRECTIONS" for "Mice" to read

"Open pack and apply 1/4 to 1/2 oz. (1-2 level teaspoons) of bait at 8- to 12-foot intervals."

2. Amend the "STORAGE AND DISPOSAL" statement on the outer package label and individual placepack labels as indicated below.

a. On the outer package label, delete statement in parentheses "For Inner Containers."

b. On the individual placepack labels add the following sentence under the heading "STORAGE AND DISPOSAL"

"Do not contaminate water, food, or feed by storage or disposal."

Under this sentence, add the paragraph of directions for "STORAGE" that appears on the proposed outer package label, i.e. "STORAGE: Store only in original closed container in a cool, dry place...."

c. On both the proposed outer label and individual placepack labels, delete the directions for "DISPOSAL" and add directions for "PESTICIDE DISPOSAL" and "CONTAINER DISPOSAL" to both labels as indicated below.

1) If your product is intended for both commercial and household uses, add the following directions:

**"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.

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**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."

- 2) If your product is intended either solely for commercial use or solely for household use, both the outer package label and individual placepack labels must only include the appropriate commercial or household disposal directions under "PESTICIDE DISPOSAL" and "CONTAINER DISPOSAL".
3. Submit one copy of your final printed labeling for both the outer package and individual placepacks 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.

A stamped copy of the labeling is enclosed for your records. If you have any questions regarding this letter, please contact Peg Perreault at (703) 305-5412 or (703) 305-6600.

Sincerely yours,



Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

4077  
ACCEPTED  
with COMMENTS  
to EPA Letter Dated

SEP 22 1995

PROMAR BAIT PACKS RAT & MOUSE KILLER  
EPA Reg. No. 61282-6  
Page 1 of 3  
2 oz.

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

61282-6

PROMAR BAIT PACKS RAT & MOUSE KILLER  
Weather Resistant Rodenticide  
For Control of Commensal Rats and Mice,  
Indoors and Outdoors

ACTIVE INGREDIENT:

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

EPA Reg. No. 61282-6

EPA Est. No. 61282-WI-1

KEEP OUT OF THE REACH OF CHILDREN  
CAUTION

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 K<sub>1</sub>,  
intramuscularly or orally, as indicated in bishydroxycoumarin  
overdose. Repeat as necessary based on monitoring of prothrombin  
times.

IN ALL CASES OF HUMAN INGESTION IMMEDIATELY NOTIFY A PHYSICIAN.

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

HACCO, Inc.  
P.O. Box 7190  
Madison, WI 53707

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Back 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 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 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. This product is especially suited for use in wet or damp areas, including river banks, gullies, irrigation ditches, railroad tracks, loading areas, in or around rat holes under granaries, along fences, 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 with food. Do not apply bait directly to ground surface or in grass or other ground cover. Do not broadcast bait.

**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.

PROMAR BAIT PACKS RAT & MOUSE KILLER  
EPA Reg. No. 61282-6  
Page 3 of 3  
2 ozs.

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**APPLICATION DIRECTIONS**

**Rats:** Apply 2 to 8 baits per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days.

**Mice:** Apply 1/4 to 1/2 oz. (1-2 level tablespoons) of bait at 8- to 12-foot intervals. Larger placements (up to one entire 2 oz placepack) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days.

**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**

**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.

**BEST COPY AVAILABLE**

PROMAR BAIT PACKS RAT & MOUSE KILLER  
EPA Reg. No. 61282-6  
Page 1 of 3  
Outer Packaging: 8x2 oz.; 60x2 oz.; 300x2 oz.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

SEP 22 1995

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
61282-6

PROMAR BAIT PACKS RAT & MOUSE KILLER  
Weather Resistant Rodenticide  
For Control of Commensal Rats and Mice,  
Indoors and Outdoors

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 panels for additional precautionary statements.

EPA Reg. No. 61282-6  
EPA Est. No. 61282-WI-1

HACCO, Inc.  
P.O. Box 7190  
Madison, WI 53707

NET CONTENTS:

PROMAR is a Registered Trademark of HACCO, Inc.

PROMAR BAIT PACKS RAT & MOUSE KILLER  
EPA Reg. No. 61282-6  
Page 2 of 3  
Outer Packaging: 8x2 oz.; 60x2 oz.; 300x2 oz.

Left Panel or Back 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 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 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. This product is especially suited for use in wet or damp areas, including river banks, gullies, irrigation ditches, railroad tracks, loading areas, in or around rat holes under granaries, along fences, garbage dumps, and landfills.

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#### APPLICATION DIRECTIONS

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**Rats/** Replace contaminated or spoiled bait immediately.

**Mice** Collect and dispose of all dead animals and leftover bait properly. To prevent reinfestation, limit



PROMAR BAIT PACKS RAT & MOUSE KILLER

EPA Reg. No. 61282-6

Page 3 of 3

Outer Packaging: 8x2 oz.; 60x2 oz.; 300x2 oz.

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.

Right Panel or Back Panel(Cont.)  
Directions for Use (Continued)

STORAGE AND DISPOSAL  
(For Inner Containers)

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.

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

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 K<sub>1</sub>, intramuscularly or orally, as indicated in bishydroxycoumarin overdose. Repeat as necessary based on monitoring of prothrombin times.

**IN ALL CASES OF HUMAN INGESTION IMMEDIATELY NOTIFY A PHYSICIAN.**

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.