

SEP 27 1995

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

Subject: Rat and Mouse Killer Bait Packs (formerly RAMIK BROWN Bait Packs)
EPA Reg. No. 61282-9
Application for Amended Registration and
Resubmission of Amended Labeling (per PR Notice 94-7) Dated August 31,
1995

Dear Ms. Thompson,

Your application for amended registration, originally submitted July 14, 1995, included a proposed change in the product name from RAMIK BROWN Bait Packs to Rat and Mouse Killer Bait Packs as well as a proposed change in the product formulation. Your product name change was previously accepted in our letter dated August 22, 1995. A revised Confidential Statement of Formula (CSF) was submitted with your application which indicates that the new product formulation would be a straight repack of EPA Reg. No. 2393-476. Your revised CSF is acceptable. **Please note that the revised CSF, dated July 14, 1995, supersedes all previous CSFs for EPA Reg. No. 61282-9. The formulation indicated on the July 14, 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. 2393-476 is a "loose bait" that will be repacked into 2-oz. placepacks under Reg. No. 61282-9. Placepack penetration data are needed to support the claim for control of mice as well as commensal rats. As indicated in your August 31, 1995 letter, you have committed to conduct studies on placepack penetration by mice and rats and both studies will be submitted by May 1996.

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

CONCURRENCES

SYMBOL	7505C						
SURNAME	Perrault						
DATE	9/27/95						

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- 1. Amend the qualifying statement on the proposed outer package label for the 6-pack size (six 2-oz. placepacks) to read exactly as we indicated in our letter dated August 22, 1995. The modification of the statement on your proposed outer label is NOT acceptable. The statement must read

"The amount of bait contained in the packs in this box is unlikely to be sufficient to kill more than 3 to 12 rats."

This statement should only appear on the outer label for the 6-pack size. This qualifier is not appropriate for individual placepacks or for any other size of outer package. These placepacks may not be sold individually unless all claims and directions pertaining to the control of rats are deleted. Note that a different (alternate) brand name would be needed if 2-oz., mouse-only placepacks were to be sold.

- 2. Amend the **"STORAGE AND DISPOSAL"** statement on the outer package label and individual placepack labels as indicated below.
 - a. On the proposed individual placepack labels, delete the sentence of directions for **"DISPOSAL"** and add directions for **"STORAGE AND DISPOSAL"** as follows

"STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: Securely wrap wastes resulting from the use of this product in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse container. Wrap container securely in several layers of newspaper and discard in trash."

- b. On the proposed outer package label under the heading **"STORAGE AND DISPOSAL,"** delete statement in parentheses **"For Inner Containers."** In addition, delete the sentence of directions for **"DISPOSAL"** and add directions for **"PESTICIDE DISPOSAL"** and **"CONTAINER DISPOSAL"** to the outer label 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.

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, the outer package label should 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)

7/6

RAT AND MOUSE KILLER BAIT PACK
EPA Reg. No. 61282-9
Packet Labeling: 2 oz.
Page 1 of 3

August 31, 1995

ACCEPTED
COMMENTS
to EPA Letter Dated

SEP 27 1995

RAT AND MOUSE KILLER
BAIT PACK
A Pelletized Rodenticide
READY MIXED

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
and the FIFRA Act, the pesticide
has been registered under EPA Reg. No.
61282-9

ACTIVE INGREDIENT:	
Diphacinone {2-(Diphenylacetyl)- 1,3-indandione}	0.005%
INERT INGREDIENTS:	99.995%
TOTAL	100.000%

EPA Reg. No. 61282-9
EPA Est. No. 61282-WI-1

KEEP OUT OF REACH OF CHILDREN*

CAUTION*

*(Pt. size as required by size of front panel.)

PRECAUTIONARY STATEMENTS

HAZARD 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.

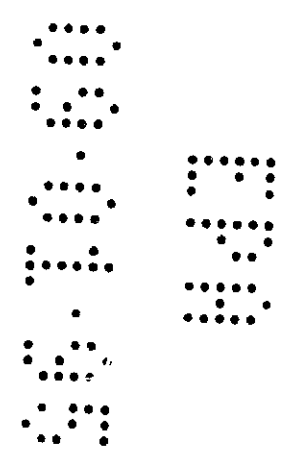
NOTE TO PHYSICIAN: If ingested, administer Vitamin K₁ intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

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.

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

Manufactured By:
HACCO, Inc.
P.O. Box 7190
Madison, WI 53707

NET WEIGHT: 2 oz.



RAT AND MOUSE KILLER BAIT PACK
EPA Reg. No. 61282-9
Packet Labeling: 2 oz.
Page 2 of 3
BACK LEFT PANEL

August 31, 1995

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 hooped livestock, raccoons, bears, 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 broadcast bait.

SELECTION OF TREATMENT AREAS: Determine areas where rats and/or mice will most likely find and consume the bait. Generally, these areas 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 food as possible.

BACK RIGHT PANEL

DIRECTIONS FOR USE (Continued)

APPLICATION DIRECTIONS:

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

Mice: Open pack and apply ¼ to ½ ounce of bait per placement location. Space placements at 8- to 12-foot intervals. Larger placements (up to one unopened 2-ounce pack) may be needed at points of extremely 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.

675

RAT AND MOUSE KILLER BAIT PACK

August 31, 1995

EPA Reg. No. 61282-9

Packet Labeling: 2 oz.

Page 3 of 3

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 bait as needed.

NOTE: Notice of Warranty would be on the outer packaging.

675