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61282-24

1/9



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg. Number:
61282-24

Date of Issuance:
MAY 29 1996

NOTICE OF PESTICIDE:
 x Registration
 Reregistration

Term of Issuance:
Conditional

Name of Pesticide Product:
RAMIK GREEN KILLS
GROUND SQUIRRELS

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

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

5496993 $\frac{170}{18}$

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

- I. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
- II. Make the labeling changes listed below before you release the product for shipment.
 - A. Revise the EPA Registration Number to read, "EPA Reg. No. 61282-24.
 - B. The proposed label must be amended to include a notice pertaining to endangered species. The following statement, under the heading "**ENDANGERED SPECIES CONSIDERATIONS**" must be added directly below the "**ENVIRONMENTAL HAZARDS**" statement:

continued on p.2

Signature of Approving Official:

Date:

MAY 29 1996

EPA Form 8570-6

C: | HACCO | 61282-24. REG
P. Perreault

"ENDANGERED SPECIES CONSIDERATIONS

Notice: It is a federal offense to use any pesticide in a manner that results in the death of a member of an endangered species. The use of this product may pose a hazard to Federally designated endangered/threatened species. Suggested measures to protect endangered species in your county may exist in an EPA "Interim Measures" pamphlet. You may call EPA's Endangered Species Hotline, 1-800-447-3813, to find out if an "Interim Measures" pamphlet exists for your county and have one sent to you. You can also consult your local county extension office or pesticide state lead agency to determine whether they have imposed any requirements in your area to protect endangered and threatened species."

Due to Agency concerns about exposure to threatened and endangered species, the Agency is currently developing a program (The Endangered Species Protection Program) to identify all pesticides whose use may cause potential adverse impacts on threatened and endangered species and to implement mitigation measures that will eliminate the adverse impacts. The program will require users to consult county-specific bulletins. These bulletins will provide information about specific use restrictions to protect threatened and endangered species in the county of specific pesticide use. Consultations with the Fish and Wildlife Service will be necessary to assess risks to newly listed species or from proposed new uses.

The Agency plans to publish a description of the Endangered Species Protection Program in the Federal Register and have enforceable county-specific bulletins. Because the Agency is taking this approach for protection of threatened and endangered species, it is not imposing specific label modifications at this time. Rather, any requirement for product use modifications will occur in the future under the Endangered Species Protection Program.

In addition, we note that industry has established a Task Force to develop mapping data on threatened and endangered species. Industry initiatives to address endangered species concerns are being coordinated by the American Crop Protection Association (ACPA).

- C. With respect to the proposed label claims for this product and the efficacy data cited to support these claims, our comments on the data and the required revisions to your proposed label are discussed below.

1. The reports of field trials conducted in the 1970's with unidentified Ramik formulations to control California ground squirrels in Davis, CA, suggest that this RAMIK GREEN product might be useful for such purposes.

2. The results of the laboratory research report run with what was likely to have been a discontinued formulation of RAMIK GREEN are not sufficient to support a claim that the current RAMIK GREEN formulation would be likely to control Belding's ground squirrels. In that 1976 study, it appears that a challenge diet very unpalatable to the squirrels was used and that the animals were able to consume large amounts of toxic bait over periods of many days before succumbing. One animal survived the ingestion of a cumulative total of more than 230 g. of the bait. Results such as these suggest either that Belding's ground squirrels are relatively resistant to Diphacinone or that the test bait was underformulated.

Other research has indicated that Belding's ground squirrels are extremely reluctant to accept grain-based baits. The high degree of acceptance reported for the RAMIK GREEN bait used in this study may have been due to conditions peculiar to the test situation and the time of year in which it was run. Among such conditions might be the presenting of the animals with an apparent choice between eating either toxic bait or Purina lab chow and total abstinence.

If your product were well accepted by Belding's ground squirrels under field conditions, it could be very useful to ranchers and farmers in places such as Modoc County, CA, where this species is abundant. The most appropriate test for effectiveness would be a field trial using procedures much like those proposed for your California ground squirrel study.

4. We do not feel that sufficient evidence has been submitted to support claims for a conditional registration for ground squirrel species other than Spermophilus beecheyi, the California ground squirrel. This also is the only species for which you have made a commitment to generate efficacy data with the RAMIK GREEN formulation proposed for registration under the file symbol 61282-EU.

In this regard, insert "California" between "of" and "Ground" in the proposed label claim "Weather-Resistant Rodenticide . . . Squirrels".

- D. The text of the "DIRECTIONS FOR USE" portion of the proposed label appears to be a combination of what we have prescribed in our letter of February 13, 1989, for HACO's product 2393-498 and in PR Notice 94-7. This text must be revised to mention children as a significant potential nontarget organism and to prohibit certain type of applications so that §2(ee)-

4/
9

familiar users cannot legally make applications which might expand the range of nontarget species potentially exposed to the bait or which might lead to the contamination of food or feed crops. As revised, the "DIRECTIONS FOR USE" should read as indicated below.

"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 prevent accidents:

1. Store product not in use in a location out of reach of children, pets, and livestock.
2. Apply this product in secured, tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be constructed and used in ways which prevent such children from reaching into bait compartments and obtaining bait. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears, other potentially destructive animals, or in areas prone to vandalism. Stations must be secured so that they cannot be overturned by young children, pets, or wind. Stations used in areas open to livestock and/or nontarget wildlife must be secured so that the units cannot be readily overturned by any nontarget animals that have access to them.
3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS: This anticoagulant bait may be used to control California ground squirrels (*Spermophilus beecheyi*) in secured bait-station applications in or near levee or ditch banks, around farm buildings, along fence lines, in orchards, in or near crops, and in non-crop areas. DO NOT broadcast this bait, apply it directly to food or feed crops, or use it in any manner

other than that prescribed by this label.

APPLICATION DIRECTIONS: Secure bait stations at locations where they will be readily accessible to target ground squirrels, preferably near active burrows. Secure stations 20 to 100 feet apart, depending upon the density of the California ground squirrel population. Use 2 to 4 pounds of bait per bait station.

Check bait stations frequently to insure that an uninterrupted supply of bait is always available. Maintain an uninterrupted supply of fresh bait for at least 30 days or until all signs of feeding have stopped. Collect and dispose of all dead animals and leftover bait properly.

Bait stations may be maintained in areas on permanent bases, but should only be loaded with toxic bait when California ground squirrels are active and accepting grain-based foods in numbers sufficient to promote effective control."

III. Submit two copies of your revised final printed labeling before you release the product for shipment.

In addition, we have reviewed the protocol you submitted for the proposed field trials involving California ground squirrels. The protocol is basically acceptable; however, the types of changes identified below might improve the quality of the study and the inferences that might be drawn from it.

- a. Widen buffer zones.

As the goal of having buffer zones is to limit interference with efficacy estimates caused by the effects of nearby treatments (or nontreatments), the more isolated each censused area is from other ground squirrel habitat given a different treatment, the better. We feel that the buffer zones should extend at least 100 yards beyond the edges of the censused areas.

- b. Expand assessment of possible nontarget effects to include pretreatment and posttreatment assessments of relative abundance, analyses of Diphacinone residues in carcasses of samples of nontarget and target animals, and tracking of scavengers and predators to nest, hack, and den sites.

The proposed strategy for carcass searches is unlikely to detect any effects on species which are relatively earth-bound and which have relatively small home ranges. Such organisms would include other types of rodents and perhaps one

6/9

or more lagomorphs.

Nontarget predators and scavengers would be likely to die away from the study site because these organisms tend to have large home ranges and because the toxicant acts very slowly. For an affected scavenger to be located on the study site, the animal would have to be rendered essentially immobile on a return visit for more carcasses (or more bait). We feel that such would be a very unlikely event even if the actual secondary or primary effects of this fish-flavored bait on scavenger species were significant.

If the above specified 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 notice, please contact Peg Perreault at (703) 305-5409 or (703) 305-6600.

Sincerely yours,



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

7/9

RAMIK GREEN Kills Ground Squirrels
EPA Reg. No. 61282-
September , 1995
Page 1

RAMIK® GREEN Kills Ground Squirrels
Fish Flavored
Weather-Resistant Rodenticide for Control of Ground Squirrels

ACTIVE INGREDIENT:

Diphacinone (2-Diphenylacetyl-1,3-Indandione) ... 0.005%

INERT INGREDIENTS: 99.995%

TOTAL 100.000%

EPA Reg. No. 61282-

EPA Est. No. 61282-WI-1

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

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

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Keep away from humans, domestic animals, and pets. If swallowed by human beings, domestic animals or pets, this material may reduce the clotting ability of the blood and cause bleeding. IN ALL CASES OF HUMAN INGESTION, IMMEDIATELY NOTIFY A PHYSICIAN.

NOTE TO PHYSICIAN AND VETERINARIAN: If ingested, administration of vitamin K₁ intramuscularly and orally, combined with blood transfusions, is indicated as 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.

Manufactured By:
HACCO, Inc.
Madison, WI 53707

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAY 29 1996

Net Weight: 20 lbs.

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

61282-24

8/9

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. This product must be used in secured tamper-resistant bait stations. These bait stations must be constructed to permit entry by target species but not by larger animals and must be strong enough to inhibit destruction by livestock and nontarget animals. Stations must be constructed to inhibit spillage of bait to the outside environment and must be secured so that they cannot be readily overturned by wind, livestock, pets and wildlife.
3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

GROUND SQUIRRELS

USE RESTRICTIONS: This product is an anticoagulant bait for control of the following species:

- California Ground Squirrels (*Spermophilus beecheyi*)
- Belding's Ground Squirrels (*S. beldingi*)
- Columbian Ground Squirrels (*S. Columbianus*)
- Richardson's Ground Squirrels (*S. richardson*)

in bait station applications in or near levee or ditch banks, around farm buildings, along fence lines, in orchards, in or near crops, and in non-crop areas.

9/9

APPLICATION DIRECTIONS: Secure bait stations at locations where they will be readily accessible to target ground squirrels, preferably near active burrows. Secure stations 20 to 100 feet apart, depending upon density of the ground squirrel population. Use 2 to 4 pounds of bait per bait station.

Check bait stations frequently to insure that an uninterrupted supply of bait is always available. Maintain an uninterrupted supply of bait for at least 30 days or until all signs of feeding have stopped. Bait stations may be maintained on a permanent basis to prevent reinfestation of the area.

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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

PLASTIC CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

FIBER DRUMS WITH LINER DISPOSAL: Completely empty liner by shaking and tapping sides and bottom. Dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If fiber drum is contaminated, puncture and dispose of in same manner; offer drum for recycling or reconditioning.

NOTICE OF WARRANTY

Manufacturer and Seller warrant that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Manufacturer and Seller. In no case shall Manufacturer and Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Manufacturer and Seller make no warranties, guarantees, or representations of any kind, either expressed or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including, but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.