

61282-49

02/17/2005

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 17, 2005

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

771056 300/17
772360 300/17

Attention: Ms. Judith A. Thompson

Subject PROZAP® Zinc Phosphide Pellets
EPA Reg. No. 61282-49
Your amended application of November 21, 2004
Additional Sticker Labeling

Purpose This submission revises the labeling for this product, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) to add additional restrictive texts on a sticker label.

Review The State of Washington requested that you add the following additional text to the labeling for this product as a sticker:

Do not apply Prozac Zinc Phosphide Pellets (EPA Reg. No. 61282-49) to timothy or timothy/alfalfa mixtures within 60 days of harvest.

The reason for this text is that it reflects the data developed by IR-4 for this use. Originally, you had proposed no pre-harvest interval (PHI) while IR4 had proposed one of 120 days. Washington State later recommended a PHI of 60 days. We accept this PHI on an interim basis and will let you know if it needs to be modified at a later date. At that time, we may have suggestions for more label improvements to make the presentation clearer.

Review-continued The State of Washington also requested that you add the following additional text to the labeling for this product as a sticker:

Do not apply Prozac Zinc Phosphide Pellets (EPA Reg. No. 61282-49) to timothy/clover mixtures.

The reason for this change is that there is no tolerance for clover in 40 CFR 180.284 other than one to be used under section 18 (Emergency Exemption), which expires on December 31, 2005.

Until the Agency approves a tolerance on clover, you must use the sticker in the interim and delete the mention of this site from your label at your next printing.

Sticker approval The sticker labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable. Enclosed is a stamped version of the text.

Existing Stocks The sticker must appear on all existing stocks of labels for this product, regardless of where you intend to ship the product. Within 18 months of this letter, you must incorporate the text on the sticker label to your final printed label. The minimum type size is 12 point.

Consequence for non-compliance This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with this condition. Your release for shipment of the product bearing the amended labeling constitutes acceptance of this condition.

A stamped copy of the sticker labeling is enclosed for your records.

EPA Contact If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosures 1. Stamped Sticker Label

Letter Filed USB 512 MB Flash Drive 1, E:\1-7-2005 Backup\Dan's Office Work\A Flash Drive 1\Zinc Phosphide\61282-49, stickers for WA, 2-10-2005.wpd

cc Erik Johansen, Washington State

Prozap Zinc Phosphide Pellets

EPA Reg. No. 61282-49

November 21, 2004

Proposed Sticker for Container Labeling:

- Do not apply Prozap Zinc Phosphide Pellets (EPA Reg. No. 61282-49) to timothy or timothy/alfalfa mixtures within 60 days of harvest.
- Do not apply Prozap Zinc Phosphide Pellets (EPA Reg. No., 61282-49) to timothy/clover mixtures

ACCEPTED
 with COMMENTS
 in EPA Letter Dated:

FEB 17 2005

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
61282-49

