

67517-23

12/17/2010

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Dr. Jim Barron, Ph.D.
PM Resources
13001 St. Charles Rock Rd.
Bridgeton, MO 63044

DEC 17 2010

Dear Dr. Barron:

Subject: Compliance with EPA's May 28, 2008 Risk Mitigation Decision
Rat Control Pellets
EPA Registration No. 67517-23
Submission Date: November 20, 2009

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) to comply with the Agency's revised May 28, 2008 "Risk Mitigation Decision (RMD) for Ten Rodenticides" as amended, will be acceptable provided you submit one (1) revised final printed copy with the following changes before releasing the product for shipment:

1. Revise the statement "*For Use In and Around Agricultural Buildings and Industrial Sites Only*", located on sublabel A, to read "*This Product May Only be Used Inside and Within 50 Feet of Agricultural and Industrial Buildings.*"
2. Add a bullet next to "*Remove contact lenses...then continue rinsing eye.*" within the **FIRST AID** box on sublabels A and B.
3. Revise the **PRECAUTIONARY STATEMENTS** as indicated:

CAUTION: *Harmful if swallowed. Keep away from children, domestic animals, and pets. Do not get in eyes, on skin, or on clothing. All handlers (including applicators) must wear shoes plus socks, and gloves. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.*

NOTICE: This product contains an ingredient known in the State of California to cause reproductive toxicity. Wash hands thoroughly after using this product. Dispose of as instructed below.

User Safety Requirements

Follow manufacturer's instruction for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco, or using the toilet and change into clean clothing.

TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian or 1-800-xxx-xxxx [optional] at once.

NOTE TO PHYSICIAN OR VETERINARIAN

Contains the anticoagulant Warfarin. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K₁ orally or intramuscularly.

4. Revise the **ENVIRONMENTAL HAZARDS** section on sublabels A and B as follows: *"This product is extremely toxic to mammals and birds. Dogs, and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff may also be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash water or rinsate."*

5. For sublabels A and B, add the following statement to the **READ THIS LABEL** section of the **DIRECTIONS FOR USE**: *"Use only for the sites, pests, and application methods described on this label."*

6. At the end of **"IMPORTANT"** and immediately before **"USE SITES"** add: *"Note: Bait stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait."*

7. Revise the **USE SITES** and **USE RESTRICTIONS** sections on sublabel A as follows:

USE SITES: *"This product may be used only to control Norway Rats, Roof Rats, and House Mice inside and outside within 50 feet of industrial and agricultural buildings, and similar man-made structures."*

USE RESTRICTIONS: *"Do not place near or inside ventilation duct openings. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come into contact with food. Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment or surfaces that come into direct contact with food. Do not use this product in sewers. Do not broadcast bait. Do not apply further than 50 feet from buildings. Do not sell this product in individual containers holding less than 4 pounds of bait."*

8. Revise the **USE SITES** and **USE RESTRICTIONS** sections on sublabel B as follows:

USE SITES: *"This product may be used only to control Norway Rats, Roof Rats, and House Mice inside and outside within 50 feet of homes, industrial and agricultural buildings, and similar man-made structures."*

USE RESTRICTIONS: *"Do not place near or inside ventilation duct openings. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come into contact with food. Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment or surfaces that come into direct contact with food. Do not use this product in sewers. Do not broadcast bait. Do not apply further than 50 feet from buildings. Do not sell this product in individual containers holding less than 4 pounds of bait."*

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Reference to Website on Label

Should you wish to add a reference to the company's website on your label, please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, **regardless of whether a website is referenced on your product's label**, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Terms/Conditions of Sale/Distribution

The registrant must not sell or distribute product in a manner that results in sale in stores oriented towards residential consumers (e.g. grocery, drug, hardware, home improvement stores). The registrant may sell or distribute the product in a manner that results in sale in stores oriented towards agricultural consumers: (i.e. farm, agricultural, tractor stores) and pest control operators.

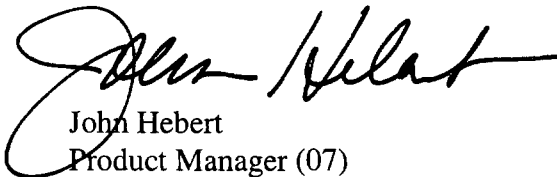
This product may not be sold in packaging that holds less than 4 pounds of bait.

Existing Stocks Provisions

- The registrant may not distribute or sell existing stocks of this product after June 4, 2011 unless they conform to the terms and conditions of registration as amended today.
- Any person other than the registrant may sell and distribute existing stocks of this product with the previously approved label until such stocks are exhausted.
- Any person may use existing stocks of this product with the previously approved label until such stocks are exhausted.

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 constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. If you have questions about this letter, please contact Jennifer Gaines at (703) 305-5967 or via e-mail at gaines.jennifer@epa.gov.

Sincerely yours,



John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

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Note: This master label bears directions and sublabels for Agricultural/Industrial and Professional Use with use restrictions specific to the container size and user.

RAT CONTROL PELLETS

ACCEPTED
with COMMENTS
In EPA Letter Dated
DEC 17 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

Sublabel A: Agricultural and Industrial Use 67517-23

Sublabel B: Professional (PCO) Use

ACTIVE INGREDIENT:

Warfarin (CAS No.: 81-81-2) 0.025%

OTHER INGREDIENTS 99.975%

TOTAL 100.000%

Manufactured By
PM RESOURCES, INC.
13001 St. Charles Rock Road
Bridgeton, MO 63044

EPA Reg. No.: 67517-23
EPA Est. No.: 67517-MO-1

50912

RAT CONTROL PELLETS

For Use In and Around Agricultural Buildings and Industrial Sites Only

Kills Norway Rats, Roof Rats and House Mice

Sublabel A: Agricultural and Industrial Use

ACTIVE INGREDIENT:

Warfarin (CAS No.: 81-81-2).....0.025%

OTHER INGREDIENTS.....99.975%

TOTAL 100.000%

KEEP OUT OF THE REACH OF CHILDREN

CAUTION:

**SEE SIDE/BACK PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS**

**MAY BE HARMFUL IF EATEN
BY CHILDREN OR PETS**

EPA Reg. No.: 67517-23

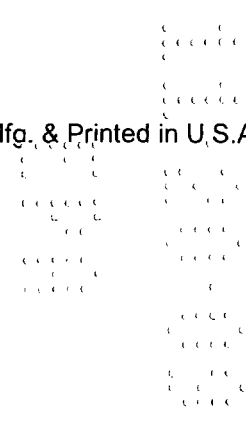
EPA Est. No.: 67517-MO-1

NET WEIGHT: 4 to 50 POUNDS

Manufactured By
PM RESOURCES, INC.
13001 St. Charles Rock Road
Bridgeton, MO 63044

Lot/Code/Product/Revision Numbers as Needed
Precautionary Labeling Must Meet Type Size and Prominence Requirements

Mfg. & Printed in U.S.A.



PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****CAUTION**

Keep away from humans, domestic animals and pets. May be harmful or fatal if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling bait. If swallowed this material may reduce the clotting ability of the blood and cause bleeding.

NOTICE: This product contains an ingredient known in the State of California to cause reproductive toxicity. Wash hands thoroughly after using this product. Dispose of as instructed below.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor for treatment. You may also contact the Hotline Number 1-800-858-7378 for health concerns, emergency medical treatment information or pesticide incidents.

- | | |
|-------------------------------|--|
| If Swallowed | <ul style="list-style-type: none">• Call a poison control center, doctor, or HOT LINE NUMBER 1-800-858-7378 immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person. |
| If in Eyes | <ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice. |
| If On Skin or Clothing | <ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center, doctor, or HOT LINE NUMBER 1-800-858-7378 immediately for treatment advice. |

NOTE TO PHYSICIAN

If ingested, administer Vitamin K 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. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

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SIDE/BACK PANEL IMMEDIATE CONTAINER- Sublabel A

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 and pets.
2. Apply bait in locations out of the reach of children, pets, domestic animals and nontarget 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 SITES: This product may be used to control Norway Rats, Roof Rats and House Mice in and around industrial and agricultural buildings, and similar man-made structures.

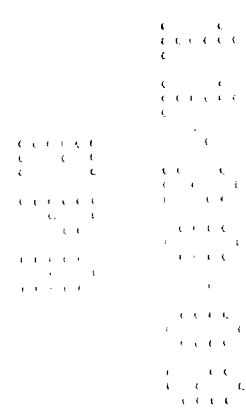
USE RESTRICTIONS: Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in contact with food. Do not broadcast bait. Bait Stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait. Do not use in homes or other human residences. Do not apply further than 50 feet from agricultural buildings. Do not sell this product in individual containers holding less than 4 pounds of bait.

SELECTION OF TREATMENT AREAS: Determine areas where rodents 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 accessible to rodents as possible.

APPLICATION DIRECTIONS:

Rats: Apply 4 to 16 ounces of RAT CONTROL PELLETS per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days.

Mice: Apply 1/4 to 1/2 ounce (one to two level tablespoons) of RAT CONTROL PELLETS at 8 to 12 foot intervals. Larger placements (up to 2 ounces) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days.



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SIDE/BACK PANEL IMMEDIATE CONTAINER- Sublabel A

DIRECTIONS FOR USE (CONTINUED)

Follow-Up: Adjust the amount of bait applied to the level of rodent feeding expected at each bait placement location. Highest bait consumption is expected to occur on the first day or two after treatment. After several days, inspect bait placements and replenish bait at sites where there is heavy feeding or where there is continued evidence of rodent activity. Maintain bait for at least one week and continue baiting until all signs of rodent activity have ceased or it becomes clear that the remaining rodents are not attracted to the bait.

Collect and properly dispose of all dead rodents and leftover bait. To discourage 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.

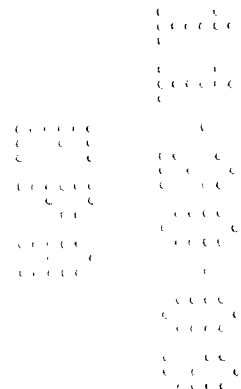
PESTICIDE STORAGE: Store only in original container in a cool, dry place inaccessible to children and pets, domestic animals or wildlife. Keep containers closed and away from other chemicals.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Dispose of empty container in a sanitary landfill, or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

NOTICE OF WARRANTY

Buyer assumes all responsibility for safety and use not in accordance with directions.



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RAT CONTROL PELLETS

This product may only be used inside and within 50 feet of buildings
or inside of transport vehicles (ships, trains or aircraft)

Kills Norway Rats, Roof Rats and House Mice

Sublabel B: Professional (PCO) Use

ACTIVE INGREDIENT:

Warfarin (CAS No.: 81-81-2)..... 0.025%

OTHER INGREDIENTS..... 99.975%

TOTAL 100.000%

KEEP OUT OF THE REACH OF CHILDREN

CAUTION:

**SEE SIDE/BACK PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS**

**MAY BE HARMFUL IF EATEN
BY CHILDREN OR PETS**

EPA Reg. No.: 67517-23

EPA Est. No.: 67517-MO-1

NET WEIGHT: 4 to 50 POUNDS

Manufactured By
PM RESOURCES, INC.
13001 St. Charles Rock Road
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Lot/Code/Product/Revision Numbers as Needed
Precautionary Labeling Must Meet Type Size and Prominence Requirements

Mfg. & Printed in U.S.A.

SIDE/BACK PANEL IMMEDIATE CONTAINER- Sublabel B**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS****CAUTION**

Keep away from humans, domestic animals and pets. May be harmful or fatal if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling bait. If swallowed this material may reduce the clotting ability of the blood and cause bleeding.

NOTICE: This product contains an ingredient known in the State of California to cause reproductive toxicity. Wash hands thoroughly after using this product. Dispose of as instructed below.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor for treatment. You may also contact the Hotline Number 1-800-858-7378 for health concerns, emergency medical treatment information or pesticide incidents.

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| If Swallowed | <ul style="list-style-type: none"> • Call a poison control center, doctor, or HOT LINE NUMBER 1-800-858-7378 immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| If in Eyes | <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice. |
| If On Skin or Clothing | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center, doctor, or HOT LINE NUMBER 1-800-858-7378 immediately for treatment advice. |

NOTE TO PHYSICIAN

If ingested, administer Vitamin K 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. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

SIDE/BACK PANEL IMMEDIATE CONTAINER- Sublabel B

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 and pets.
2. Apply bait in locations out of the reach of children, pets, domestic animals and nontarget 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 SITES: This product may be used to control Norway Rats, Roof Rats and House Mice in and around homes, industrial and agricultural buildings, and similar man-made structures.

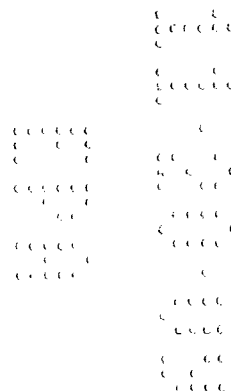
USE RESTRICTIONS: Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in contact with food. Do not broadcast bait. Bait Stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait. This product may only be used inside and within 50 feet of buildings or inside of transport vehicles (ships, trains, or aircraft). Do not sell this product in individual containers holding less than 4 pounds of bait. This product may be applied only by licensed pest control operators (PCO's).

SELECTION OF TREATMENT AREAS: Determine areas where rodents 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 accessible to rodents as possible.

APPLICATION DIRECTIONS:

Rats: Apply 4 to 16 ounces of RAT CONTROL PELLETS per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days.

Mice: Apply 1/4 to 1/2 ounce (one to two level tablespoons) of RAT CONTROL PELLETS at 8 to 12 foot intervals. Larger placements (up to 2 ounces) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for at least 15 days.



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SIDE/BACK PANEL IMMEDIATE CONTAINER- Sublabel B

DIRECTIONS FOR USE (CONTINUED)

Follow-Up: Adjust the amount of bait applied to the level of rodent feeding expected at each bait placement location. Highest bait consumption is expected to occur on the first day or two after treatment. After several days, inspect bait placements and replenish bait at sites where there is heavy feeding or where there is continued evidence of rodent activity. Maintain bait for at least one week and continue baiting until all signs of rodent activity have ceased or it becomes clear that the remaining rodents are not attracted to the bait.

Collect and properly dispose of all dead rodents and leftover bait. To discourage 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.

PESTICIDE STORAGE: Store only in original container in a cool, dry place inaccessible to children and pets, domestic animals or wildlife. Keep containers closed and away from other chemicals.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. 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.

NOTICE OF WARRANTY

Buyer assumes all responsibility for safety and use not in accordance with directions.

