

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 26 1995

5495958 301/38

Kelly Kraft  
Joseph E. Dyer, Regulatory Agent  
PM Resources, Inc.  
13001 St. Charles Rock Road  
Bridgeton, MO 63044

Subject: Rat-A-Rest Pellets (formerly Purina Rat-A-Rest Pellets)  
EPA Reg. No. 67517-34  
Application for Amended Registration dated August 7, 1995,  
Submission of Amended "Draft" Labeling dated June 13, 1995, and  
Subsequent Submission of "Final" Printed Labeling dated September 21, 1995

Dear Ms. Kraft/Mr. Dyer,

Your application for amended registration dated August 7, 1995, which requests a change in your base product name to Rat-A-Rest Pellets (formerly Purina Rat-A-Rest Pellets), is acceptable. Our files will be updated to reflect the change in the base product name.

The labeling for the subject product submitted September 21, 1995, which you indicated was the "final" printed labeling, does not reflect any of the label amendments specified in our letter dated May 11, 1995 and is, therefore, not in compliance with PR Notice 94-7. The label submitted September 21, 1995 is **not acceptable**. However, the amended draft labeling for the subject product previously submitted on June 13, 1995 (in response to our letter dated May 11, 1995) in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, and pursuant to PR Notice 94-7, is acceptable provided that you modify the label as indicated below.

1. Center the heading **"ENVIRONMENTAL HAZARDS"** and amend the statement in the paragraph under this heading to read

"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 areas below the mean high water mark."

2. Under the heading **"STORAGE AND DISPOSAL,"** add directions for **"Commercial use"** and **"Household use"** as indicated below.

CONCURRENCES							
SYMBOL	7505C						
SURNAME	Permanet						
DATE	10/26/95						

C: PM RESOURCES \ 67517-34. ltr

- a. 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:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

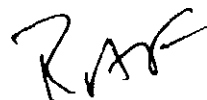
**Household use:** Do not reuse bag. Wrap bag securely in several layers of newspaper and discard in trash."

- b. If your product is intended either solely for commercial use or solely for household use, the label should only include the appropriate commercial or household disposal directions under "PESTICIDE DISPOSAL" and "CONTAINER DISPOSAL".
3. In addition, please submit one copy of your final printed labeling 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 draft labeling submitted June 13, 1995 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)

Reason For Issue. Update per EPA letter  
dated 5/11/95.

Date Issued: 6/8/95 (White)  
Prev. Date Issued: 1/9/95

Front Panel

PM Resources

EPA Reg. No. 67517-34

**RAT-A-REST™ PELLETS  
BRAND**

**Rat and Mouse Killer**

Kills Norway Rats, Roof Rats, House Mice and Warfarin Resistant Norway Rats.

Norway rats may consume a lethal dose in one feeding with first dead rodents appearing four or five days after treatment begins.

**ACTIVE INGREDIENT:**

3-[3-(4'-Bromo[1,1'-biphenyl]-4-yl)-3-hydroxy-1-phenylpropyl]-  
-4-hydroxy-2H-1-benzopyran-2-one. . . . . 0.005%

**INERT INGREDIENTS** . . . . . 99.995%  
100.000%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**SEE OTHER CAUTIONS ON RIGHT SIDE OF PANEL**

**NET WT 16 OZ (1 LB)**

**D-8251**

Manufactured By  
PM Resources, Inc.  
13001 St. Charles Rock Road  
Bridgeton, MO 63044

ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
OCT 26 1995

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, or the pesticide  
registered under EPA Reg. No.  
67517-34

Right Side Panel

PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS & DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. May be harmful or fatal if swallowed or absorbed through the skin because this material may reduce the clotting ability of the blood and cause bleeding.

Do not get in eyes, on skin or on clothing. Wash arms, hands, and face with soap and water after applying and before eating and smoking. If swallowed, call a physician at once.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K<sub>1</sub> intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Keep out of lakes, streams, or ponds.

**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 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 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 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:** This product may be used to control Norway rats, roof rats and house mice in the sites indicated below.

**Urban Areas:** This product may be used in and around the periphery of homes, industrial, commercial, and public buildings, and in alleys. Do not use this product in sewers.

**Non-urban Areas:** This product may be used inside homes and inside agricultural buildings.

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 observed. Remove as much food as possible.

**APPLICATION DIRECTIONS:**

**Norway and Roof Rats:** Apply 4 to 16 ounces of bait (usually at intervals of 15 to 30 feet) per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days or until signs of rat activity cease.

**House Mice:** Apply  $\frac{1}{4}$  to  $\frac{1}{2}$  ounce of bait per placement at intervals of 8 to 12 feet. Larger placements (up to 2 ounces) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for 15 days or until signs of mouse activity cease.

**Rats & Mice:** Replace contaminated or spoiled bait immediately. Collect and properly dispose of all dead animals and leftover bait. To prevent reinfestation, eliminate food, water, and harborage as much as possible. Where a continuous source of infestation is present, establish permanent bait stations and replenish bait as needed.

**STORAGE AND DISPOSAL**

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

**STORAGE:** Store in a cool, dry place away from other chemicals. Keep containers closed.

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

**CONTAINER DISPOSAL:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

EPA Est. No. 67517-MG-1