

CERTIFIED MAIL

(2-564-243-369) 300/12 5-560868

PM Resources, Inc.  
c/o Purina Mills  
P.O. Box 66812  
St. Louis, MO 63166-6812

JUN 15 1999

Attention: Mr. Robert Broyles

Subject: Purina Assault All Weather Bait  
EPA File Symbol 67517-66  
Your Notification of January 7, 1999  
Your Amendment of March 22, 1999

Originally, you submitted this amendment as a notification. However, because your proposed labeling changes did not qualify for notification under PR Notice 98-10, we have reviewed the proposed additional statements as an amendment. Our comments follow.

1. The proposed label claims "\*\*Moisture Resistant" and "\*\*Weather Resistant" are supported by efficacy data previously accepted for this product and, therefore, are acceptable.
2. The proposed modification of the current single-feeding claim is not acceptable as it alters the context in which the information is provided and, as a result, could mislead those who read it. The single-feeding claim on this product's label shall continue to read as shown immediately below.

"Norway Rats, Roof Rats, and House Mice usually consume a lethal dose in a single day's feeding, but it may take two or more days from time of bait consumption for these rodents to die.  
Rodents cease feeding after consuming a lethal dose."

When labels are printed, the word "day's" in the first sentence may be replaced by "night's", as you had proposed in your submission of January 7, 1999. That substitution is appropriate because commensal rodents most commonly feed at night.

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3. The claim "For Indoor & Outdoor Use", also proposed in your submission of January 7, 1999, is acceptable for this product. We previously accepted this claim in our letter of February 23, 1996, to Purina Mills, Inc.
4. The "**DIRECTIONS FOR USE**" portion of this product's label must remain as it appears on the label accepted on November 19, 1998. The entire "**DIRECTIONS FOR USE**" should appear on the same panel of the label.
5. Substitutions of the words "bars" or "bait bars" for "bait" and "baits" in the "**DIRECTIONS FOR USE**" are not acceptable at this time. It is not clear to us whether the text in brackets would be an improvement over the existing text. In some places, the proposed substitutions would produce awkward grammatical constructions. If you want to refer to the product as "bars" and/or "bait bars", provide to us an illustration of the product and proposed amended labeling which would replace the current text. At this point, we are not even sure whether "bars" would be an appropriate term for this product.

The words "BAR" or "BARS" should not be used in the primary or in any alternate brand name for this or any rodenticide bait. Young children might associate the word or the shape of the word with something they have seen on candy wrappers.

In the future, when you fill out the application form as the agent, include both the registrant's and agent's name and address in Block 5. Indicate which is the registrant and which is the agent. Also, indicate where the correspondence should be sent. In this latest application, there was a lot of confusion because no name and address appeared in Block 5 and because the agent's address was not provided in the application package. This confusion delayed our processing of this amendment.

If you have questions about this letter, you may reach Grace M. Robiou at (703) 305-1016.

Sincerely,



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

Peacock:C:\Bromethalin\67517-66(2).wpd June 14, 1999 (2:51PM)

FRONT PANEL

ASSAULT ALL WEATHER BAIT  
Contains Bitrex

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

For Indoor and Outdoor Rodent Control

JUN 15 1999

\* [For Outdoor and Indoor Use]

Kills Roof Rats, Norway Rats and House Mice

\*[Rats and Mice usually consume a lethal dose in a single day's [night's] feeding,  
May take 2 or more days to die]

\*[Moisture Resistant] \* [Weather Resistant]

Under the Federal Insecticide, Fungicide, and Rodenticide Act, registered under EPA Reg. No. 67517-66

\*\*{Roof Rats, Norway Rats and House Mice usually consume a lethal dose in a single day's [night's] feeding, but it may take two or more days from time of bait consumption for these rodents to die. Rodents cease feeding after consuming a lethal dose. ASSAULT ALL WEATHER BAIT is effective against anticoagulant-resistant rats and mice.}

ACTIVE INGREDIENT:

Bromethalin: *[N-methyl-2,4,-dinitro-N-(2,4,6-tribromophenyl) - 6-(trifluoromethyl) benzenamine.....	0.01%
INERT *[OTHER] INGREDIENTS.....	99.99%
TOTAL	100.00%

KEEP OUT OF THE REACH OF CHILDREN  
CAUTION  
SEE SIDE/BACK PANEL OF ADDITIONAL  
PRECAUTIONARY STATEMENTS

\*\*{EPA Reg. No.: 67517-66}

\*\*EPA Est. No.: 67517-MO-1}

NET WT.: 9 lbs.  
(288 x 0.5 Oz.)

\*[12 x 0.5 Oz. Bait Bars]

\*\*{Manufactured By  
PM RESOURCES, INC.  
13001 St. Charles Rock Road  
Bridgeton, MO 63044}

\*\*{ (Lot/Code/Product/Rev. Numbers as needed) }  
Precautionary Labeling Must Meet Type Size and Prominence Requirements.

Mfg. & Printed in U.S.A.

\*[Optional Use]  
\*\*{Optional Placement on Back/Side Panel}

## SIDE/BACK PANEL

**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.

**\*[FIRST AID]**

**If Swallowed:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

**If In Eyes:** Flush eyes with plenty of water. Call a physician if irritation persists.

**If on Skin:** Wash with plenty of soap and water. Get medical attention if irritation persists.]

**NOTE TO PHYSICIAN:**

ASSAULT ALL WEATHER BAIT is not an anticoagulant type of rodenticide. If ingested, limit absorption by either emesis or gastric lavage. Sublethal symptoms, if present, would be the result of cerebral edema and should be treated accordingly through administration of an osmotic diuretic and corticosteroid.

**ENVIRONMENTAL HAZARDS**

This product is toxic to mammals and birds. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

**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 direction 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 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.

**SIDE/BACK PANEL**

**DIRECTIONS FOR USE (CONTINUED)**

**USE RESTRICTIONS:** This product may be used to control Norway rats, roof rats and house mice, in and around sewers, homes, industrial and agricultural buildings, and similar man-made structures. This product may also be used in alleys located in urban areas, inside transport vehicles (ships, trains, aircraft), and in and around related port or terminal buildings. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food.

**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. Remove as much alternative food accessible to rodents as possible.

**APPLICATION DIRECTIONS:**

**Rats:** Apply 2 to 12 baits \*[bait bars] per placement. Space placements at intervals of 20 to 30 feet.

**Mice:** Apply 1 to 2 baits \*[bait bars] per placement. Space placements at intervals of 8 to 12 feet.

**Rats and Mice:** Adjust the amount of bait \*[bars] applied to the level of rodent feeding expected at each bait \* [bar] placement location. Highest bait consumption is expected to occur on the first day or two after treatment. After several days, inspect bait \*[bar] placements and replenish bait \*[bars] at sites where there is heavy feeding or where there is continued evidence of rodent activity. Maintain bait \*[bars] 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 \*[bars].

Collect and properly dispose of all dead rodents and leftover bait \*[bars]. 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 \*[bar] stations and replenish as needed.

\*[Optional Use]

**SIDE/BACK PANEL****STORAGE AND DISPOSAL**

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

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

**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:** Do not reuse empty containers. Dispose of liner in a sanitary landfill or by incineration, or, if allowed by state or local authorities, by burning. If burned, stay out of smoke.

**NOTICE OF WARRANTY**

**PM RESOURCES, INC.** MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED CONCERNING THIS PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL CONDITIONS IN ACCORD WITH THE STATEMENTS MADE ON THIS LABEL.

\*[Buyer assumes all responsibility for safety and use not in accordance with directions.]