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67517-71

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

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FEB 27 1998

Joseph E. Dyer, Regulatory Agent
PM Resources, Inc.
13001 S. Charles Rock Rd.
Bridgeton, MO 63044

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Assault Mouse/Rat Pellets
EPA Registration No. 67517-71
Application for Amended Registration dated February 3, 1997

Dear Mr. Dyer,

Your application for amended registration for EPA Reg. No. 67517-71, dated February 3, 1997, and the proposed revised labeling submitted with your application have been reviewed. Your application and proposed revised label for the "Immediate Container" are acceptable provided you modify your label as indicated below.

1. Change the front panel's claim paragraph to read as indicated below.

"House Mice, Norway Rats and Roof Rats usually consume a lethal dose in a single-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 toxic dose. ASSAULT MOUSE/RAT PELLETS are effective against anticoagulant-resistant mice and rats."

These changes are needed because commensal rodents are nocturnal, consequently doing most of their feeding at night, and because the cessation of feeding which Bromethalin induces is not always followed by death.

2. Change the first "sentence" of the "USE RESTRICTIONS:" subsection of the "DIRECTIONS FOR USE" to read.

"For control of Norway Rats, Roof Rats, and House Mice in and around homes, industrial and agricultural buildings, and similar man-made structures."



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

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House mice were not included as a claimed species in this text as it appeared on your proposed revised label.

- 3. Subordinate the subheadings to the "APPLICATION DIRECTIONS" subsection of the "DIRECTIONS FOR USE" so that it is clear that they all are part of the same subsection. An organizational format that would be acceptable is shown below.

APPLICATION DIRECTIONS: The active ingredient in . . . a few days.

Norway and Roof Rats: Apply 1-8 ounces . . . properly disposed.

House Mice: Apply 1/4 ounce . . . mouse activity.

Baiting Strategy: Adjust the amount . . . the bait.

Collect and properly . . . as needed.

- 4. In the second sentence of the "APPLICATION DIRECTIONS" for "Norway and Roof Rats", change "PELLETS" to "PLACE PACKS" as you seem to be intending to suggest that they use your 67517-72 product as an alternative to bagging this one.
- 5. Change "source" to "sources" in the second sentence of the last paragraph of the "APPLICATION DIRECTIONS:" (which also is the second paragraph under "Baiting Strategy:").
- 6. When revising the "DIRECTIONS FOR USE", retain the organizational format proposed in your submission of February 3, 1997, aside from making the changes indicated above.
- 7. The paragraph under "PRECAUTIONARY STATEMENTS" should be revised to read as follows:

"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."

On your proposed labeling, the fourth and fifth sentences under "PRECAUTIONARY STATEMENTS" appear to be instructions for "Practical Treatment" or "First Aid." If you wish to include this text on your label, it must be separated from the "PRECAUTIONARY

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STATEMENTS" by using a header, as follows:

"First Aid OR Statement of Practical Treatment (either one)

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of the 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."

8. Your proposed new product name -- the old name minus "PURINA BRAND" -- is acceptable.

Please submit one copy of your revised final printed labeling before you release the product for shipment. 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 about this letter, please call me at (703) 305-5417 or (703) 305-5404.

Sincerely yours,



Peg Perreault
Chemical Manager, Team 4
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure (1)

4027
ACCEPTED
with COMMENTS
In EPA Letter Dated:

Feb. 27, 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
67517-71

FRONT PANEL

ASSAULT™ MOUSE/RAT PELLETS

Contains Bitrex

Rodenticide Bait Pellets

For the control of commensal rodents

Kills House Mice, Norway Rats and Roof Rats

House Mice, Norway Rats and Roof Rats usually consume a lethal dose in a single day's feeding, but it may take two or more days from the time of bait consumption for these rodents to die. Rodents cease feeding after consuming a lethal dose. ASSAULT MOUSE/RAT PELLETS are effective against anticoagulant-resistant mice and rats.

ACTIVE INGREDIENT:

Bromethalin: N-methyl-2,4-dinitro-N-(2,4,6-tribromophenyl)-
6-(trifluoromethyl) benzenamine..... 0.01%

INERT INGREDIENTS:..... 99.99%

TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

EPA Reg. No.: 67517-71
NET CONTENTS: 5 lbs. (2.26 kg)

EPA Est. No.: 67517-MO-1

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.

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January 14, 1997
PMR71LAA.DOC-1

REC'D EPA/OPP/DPD2
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SIDE/BACK PANEL

**PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS & 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. In case of accidental contact, flush eyes or skin with water and wash contaminated clothing. Seek medical attention immediately if ingested or if breathing difficulty occurs or irritation persists. Wash hands thoroughly after handling
ASSAULT MOUSE/RAT PELLETS.

NOTE TO PHYSICIAN: ASSAULT MOUSE/RAT PELLETS 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 this product 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 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 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.

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SIDE/BACK PANEL

DIRECTIONS FOR USE (Continued)

USE RESTRICTIONS: For control of Norway Rats and Roof Rats in and around 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 use ASSAULT MOUSE/RAT PELLETS in sewers. Do not place baits 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 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 as possible.

APPLICATION DIRECTIONS: The active ingredient in ASSAULT MOUSE/RAT PELLETS is different from anticoagulant rodenticides. Generally, rodents cease feeding after consuming a lethal amount and die within a few days.

NORWAY AND ROOF RATS: Apply 1 - 8 ounces of bait per placement location. Space placements at intervals of 15 to 30 feet. For burrow baiting, use ASSAULT MOUSE/RAT PELLETS or enclose bait pellets in a material such as plastic or paper bags. Use 1 or 2 ounces per burrow. When baiting burrows, insert each bait pack into the burrow far enough so that only a person who knows that bait is there would be likely to see it. Do not bait burrows in any location accessible to children or non-target animals unless there is no other way to bait the target population effectively. If burrows in such an area are baited, check burrows every morning and evening to make sure that rodents have not pushed bait packs out of burrows and that baits have not become more accessible to children or non-target animals in any way. Remove packs that become more accessible to non-target animals. Remove the packages of bait from burrows if the bait has not been touched by target rodents for seven days. These packs may be relocated or properly disposed.

HOUSE MICE: Apply ¼ ounce to 3 ounces of bait per placement. Space placements at intervals of 8 to 12 feet. Larger placements may be needed at points of extremely high mouse activity.

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SIDE/BACK PANEL

APPLICATION DIRECTIONS (Continued)

BAITING STRATEGY: Adjust the amount of bait applied to the level of feeding by target rodents expected at each placement location. Highest bait consumption is expected to occur during 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 source 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 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.