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67517-72

7/13/98

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

JUL 13 1998

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

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

Subject: Assault Mouse/Rat Place Pack
EPA Registration No. 67517-72
Revised Labeling dated April 10, 1998 and
Revised Confidential Statement of Formula (CSF) dated April 22, 1998

Dear Mr. Dyer,

Your proposed revised labeling for EPA Reg. No. 67517-72, dated April 10, 1998, has been reviewed. The labels for both the outer container and the individual placepacks are considered acceptable. Several comments regarding your labeling were noted in the conclusions of our review; these comments are discussed below.

1. When labels are printed, retain the organizational format for the "DIRECTIONS FOR USE" that was used for the proposed labels submitted on April 10, 1998. Note that this format must be used on the placepack labels, on which printing the entire accepted label text legibly might be quite a challenge.
2. This product's 0.5-oz placepacks may not be sold individually if the label used bears any claims, directions, or references pertaining to control of Norway and/or roof rats. A single pack bearing rat claims and sold individually would be misbranded as it would provide less bait than the label requires for a single placement made for the control of commensal rats.
3. Outer containers holding less than twelve 0.5-oz placepacks also may not be sold at this time if claims, directions, and/or references pertaining to the control of rats appear on the labels. Such containers would not provide the amount of bait needed for a single placement at the label's maximum rate for controlling rats. Containers holding at least two 0.5-oz placepacks but less than 12 may be marketed if they



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bear an appropriate qualifying statement regarding the limited numbers of rats that the amount of bait provided could be expected to control. Such labeling statements must be accepted as amendments by EPA before they may be used. As of the present time, we have accepted no such labeling statements for 67517-72.

4. Please make sure that your distributors are informed of the circumstances described by the two preceding paragraphs. You are responsible for their conduct in these and other matters pertaining to this product's registration number.

We have also reviewed your revised Confidential Statement of Formula (CSF) for Assault Mouse/Rat Place Pack, dated April 22, 1998. The CSF is acceptable; a copy has been placed in our files for EPA Reg. No. 12455-72. Please note that this CSF supersedes all previously submitted CSFs for this product.

Stamped copies of the labels for the outer container and the individual placepacks are enclosed for your records. Please note that if the conditions discussed above 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.

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(s) 2

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ACCEPTED
with COMMENTS
In EPA Letter Dated:

July 13, 1998

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

67517-72

FRONT PANEL
OUTER PACKAGE LABEL

ASSAULT MOUSE RAT PLACE PACK
Contains Bitrex

Mouse and Rat Poison
For Indoor and Outdoor Rodent Control

Kills House Mice, Norway Rats and Roof Rats

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 PLACE PACK is 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%
OTHER INGREDIENTS.....	99.99%
	TOTAL 100.00%

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

EPA Reg. No.: 67517-72

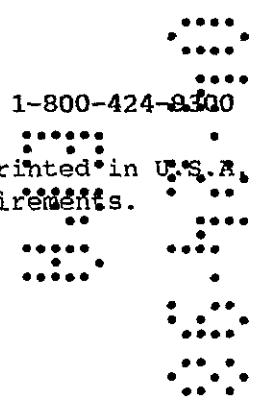
EPA Est. No.: 67517-MO-1

NET WT.: 25 X 0.5 oz (14 grams)

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

IN CASE OF EMERGENCY CALL: CHEMTREC (POISON CONTROL CENTER) AT 1-800-424-9300

(Lot/Code/Product/Rev. Numbers as needed) Mfg. & Printed in U.S.A.
Precautionary Labeling Must Meet Type Size and Prominence Requirements.



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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 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.

NOTE TO PHYSICIAN:

ASSAULT MOUSE/RAT PLACE PACK 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.

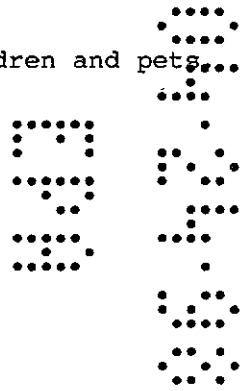
DIRECTIONS FOR USE

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 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.



SIDE/BACK PANEL

DIRECTIONS FOR USE (CONTINUED)

- 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 RESTRICTIONS: For control of Norway rats and roof rats, and house mice 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 PLACE PACK in Sewers. 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 placepacks or bait.

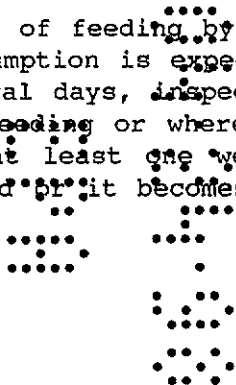
SELECTION OF TREATMENT AREAS: Determine areas where rodents will most likely find and consume the bait. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Protect bait from rain or snow. Remove as much alternative food accessible to rodents as possible.

APPLICATION DIRECTIONS: The active ingredient in ASSAULT MOUSE/RAT PLACE PACK is different from anticoagulant rodenticides. Individual mice cease feeding after consuming a toxic dose.

RATS: Apply 2 to 12 place packs per placement location. Space placements at intervals of 15 to 30 feet.

MICE: Apply 1 to 2 place packs per placement. Space placements at intervals of 8 to 12 feet. Larger placements, up to 6 place packs, may be needed at points of extremely high mouse activity.

RATS AND MICE: 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.



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SIDE/BACK PANEL

DIRECTIONS FOR USE (CONTINUED)

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 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 if allowed by state or local authorities. 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.

