



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

MAR 11 1998

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Subject: Assault Rat Place Pack
EPA Registration No. 67517-74
Application for Amended Registration dated February 4, 1997

S 519828 300/18
S 538957 300/18
S 538596 350/38

Dear Mr. Dyer,

Your application for amended registration for EPA Reg. No. 67517-74, dated February 4, 1997, and the proposed revised labeling submitted with your application have been reviewed. Your application and proposed revised labeling are acceptable provided you modify the labeling for the 1.5 oz. placepack, the outer container (pail), and the display carton as indicated below.

1. Change "form" to "from" in the first sentence of the modified single-feeding claim on the front panel (outer container label only).
2. Restore the "SELECTION OF TREATMENT AREAS" text, as it appears on the current accepted labeling for this product, to its proper locations between the "USE RESTRICTIONS:" and "APPLICATION DIRECTIONS:" subsections of the "DIRECTIONS FOR USE".
3. In the last sentence of the first paragraph of the "APPLICATION DIRECTIONS" insert a comma between "Generally" and "rats".
4. In the second sentence of the fourth paragraph of the "APPLICATION DIRECTIONS", change "food waters and harbor" to "food, water, and harborage".
5. When revising the "DIRECTIONS FOR USE", retain the organizational format proposed in your submission of February 4, 1997.
6. 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."



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

20/14

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 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."

7. On the individual placepack and the display carton labels, under "STORAGE AND DISPOSAL," change the second sentence of instructions for "CONTAINER DISPOSAL" to read "Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning."
8. Your proposed new product name -- the old name minus "PURINA BRAND" - is acceptable.

Please submit one copy each of your revised final printed labeling for the individual placepacks, the outer container, and the display carton 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.

Stamped copies of the labeling are 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)

Enclosures (3)

3044

ACCEPTED
with COMMENTS
In EPA Letter Dated:

March 11, 1998

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

67517-74

RECD EPA/OPP/DPD2

97 FEB -7, P 3 98

FRONT PANEL

PAIL COPY

ASSAULT RAT PLACE PACK

Contains Bitter

Rat Poison For Indoor and Outdoor Rodent Control

Kills Roof Rats and Norway Rats.

Rats consume a lethal dose in a single feeding and usually die from 1 to 3 days after they eat the bait. Rats cease feeding after consuming a single dose in a single-night's feeding. ASSAULT RAT PLACE PACK is effective against anticoagulant-resistant 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.: 67517-74

EPA Est. No.: 67517-MO-1

NET CONTENTS: 25 X 1.5 OZ PACKETS

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

4 of 14

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 RAT PLACE PACK

NOTE TO PHYSICIAN: ASSAULT 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 this product directly to water, or to areas where surface water is present or to 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.

5044

SIDE/BACK PANEL

DIRECTIONS FOR USE (Continued)

USE RESTRICTIONS: For control 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 RAT PLACE PACK 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 placepacks or bait.

APPLICATION DIRECTIONS: ASSAULT RAT PLACE PACK does not contain an anticoagulant rodenticide. Generally rats will consume a lethal dose in a single feeding with death occurring one to three days later.

Apply 1 to 4 placepacks per placement. Adjust the number of packs applied to the level of rat feeding expected at each placement location. Placements should be spaced at 20 to 30 foot intervals.

Highest bait consumption is expected to occur on the first day or two after treatment. After several days, inspect the placements and replenish bait at sites where there is evidence of heavy feeding. Although one night's feeding will usually provide a lethal dose, maintain bait for at least a week to provide all rats a chance to feed on the bait. Baiting should be continued until all signs of feeding have ceased.

Collect and properly dispose of all dead rodents and leftover bait. To discourage reinfestation limit source of rodent food waters and harbor as much as possible. If reinfestation does occur, repeat treatment. 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.

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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

60714

SIDE/BACK PANEL

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.

70414

ACCEPTED
with COMMENTS
In EPA Letter Dated:

March 11, 1998

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

67517-74

FRONT PANEL

DISPLAY CARTON COPY

ASSAULT RAT PLACE PACK

Contains Bitrex

Rat Poison For Indoor and Outdoor Rodent Control

Kills Roof Rats and Norway Rats.

Rats consume a lethal dose in a single feeding and usually die from 1 to 3 days after they eat the bait. Rats cease feeding after consuming a single dose in a single-night's feeding. ASSAULT RAT PLACE PACK is effective against anticoagulant-resistant 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.: 67517-74

EPA Est. No.: 67517-MO-1

NET CONTENTS: 25 X 1.5 OZ PACKETS

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

80714

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 RAT PLACE PACK.

NOTE TO PHYSICIAN: ASSAULT 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 this product directly to water, or to areas where surface water is present or to 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 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: For control 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 RAT PLACE PACK 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 placepacks or bait.

APPLICATION DIRECTIONS: ASSAULT RAT PLACE PACK does not contain an anticoagulant rodenticide. Generally rats will consume a lethal dose in a single feeding with death occurring one to three days later.

Apply 1 to 4 placepacks per placement. Adjust the number of packs applied to the level of rat feeding expected at each placement location. Placements should be spaced at 20 to 30 foot intervals.

Highest bait consumption is expected to occur on the first day or two after treatment. After several days, inspect the placements and replenish bait at sites where there is evidence of heavy feeding. Although one night's feeding will usually provide a lethal dose, maintain bait for at least a week to provide all rats a chance to feed on the bait. Baiting should be continued until all signs of feeding have ceased.

Collect and properly dispose of all dead rodents and leftover bait. To discourage reinfestation limit source of rodent food waters and harbor as much as possible. If reinfestation dose occur, repeat treatment. 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.

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. Then dispose of liner in a sanitary landfill or by incineration if allowed by state or local authorities. If burned, stay out of smoke.

10844

SIDE/BACK PANEL

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.

110914

ACCEPTED
with COMMENTS
In EPA Letter Dated:

March 11, 1998

FRONT PANEL

PLACEPACK COPY

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
67517-74

97 FEB -7 P3:37

RECD EPA/OPP/DPD2

ASSAULT RAT PLACE PACK
Contains Bitrex

Rat Poison For Indoor and Outdoor Rodent Control

Kills Roof Rats and Norway Rats.

The amount of bait in this placepack may not be sufficient to kill more than one to four 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.: 67517-74
NET CONTENTS: 1.5 OZ

EPA Est. No.: 67517-MO-1

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

Def 4

SIDE/BACK PANEL

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS & DOMESTIC ANIMALS CAUTION

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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 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 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.

13044

SIDE/BACK PANEL

DIRECTIONS FOR USE (Continued)

USE RESTRICTIONS: For control 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 RAT PLACE PACK 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 placepacks or bait.

APPLICATION DIRECTIONS: ASSAULT RAT PLACE PACK does not contain an anticoagulant rodenticide. Generally rats will consume a lethal dose in a single feeding with death occurring one to three days later.

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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. Then dispose of liner in a sanitary landfill or by incineration if allowed by state or local authorities. If burned, stay out of smoke.

14044

SIDE/BACK PANEL

NOTICE OF WARRANTY

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