

67517-81

12/17/2010

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Dr. Jim Barron
13001 St. Charles Rock Rd.
Bridgeton, MO 63044

DEC 17 2010

Dear Dr. Barron:

Subject: Compliance with EPA's May 28, 2008 Risk Mitigation Decision
Assault[®] Mouse/Rat Place Pack
EPA Registration No. 67517-81
Submission Date: November 20, 2009

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) to comply with the Agency's revised May 28, 2008 "Risk Mitigation Decision (RMD) for Ten Rodenticides" as amended, will be acceptable provided you submit one (1) revised final printed copy with the following change before releasing the product for shipment:

1. Revise the statement "*For Use In and Around Agricultural Buildings and Industrial Sites Only*", located on sublabel A, to read "*This Product May Only be Used Inside and Within 50 Feet of Agricultural, Industrial, and Port or Terminal Buildings or Inside of Transport Vehicles (Ships, Trains, Aircraft)*"
2. Revise "Fast and Effective Indoor and Outdoor Rodent Control" to read "Effective Indoor and Outdoor House Mouse and Rat Control on sublabels A and B.
3. Add an "A" after "67517-81" on the lower left-hand corner of all pages of sublabel A.
4. Add a "B" after "67517-81" on the lower left-hand corner of all pages of sublabel B.
5. Revise the first paragraph on the front panel of sublabels A and B to read "*House Mice, Norway Rats, and Roof Rats usually consume a lethal dose in a single feeding but it may take two or more days for them to die. Due to Stop Feed Action...mice and rats.*"
6. Revise the **CAUTION** statement in the **Precautionary Statements** as follows:
CAUTION: *Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Keep away from children, domestic animals, and pets. Do not get in eyes, on skin, or on clothing. All handlers (including applicators) must wear long-sleeve shirt and gloves. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.*

User Safety Requirements
 Follow manufacturer's instruction for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco, or using the toilet and change into clean clothing.

TREATMENT FOR PET POISONING
 If animal eats bait, call veterinarian or 1-800-xxx-xxxx [optional] at once.

NOTE TO PHYSICIAN OR VETERINARIAN

Contains the nerve poison Bromethalin. This is not an anticoagulant type rodenticide. For humans or animals ingesting bait and/or showing poisoning signs (such as muscle tremors, loss of hind limb use, or seizures for animals), 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.

4. Revise the **ENVIRONMENTAL HAZARDS** section on sublabels A and B as follows: *"This product is extremely toxic to mammals and birds. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff may also be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash water or rinsate."*

5. For sublabels A and B, add the following statement to the **READ THIS LABEL** section of the **DIRECTIONS FOR USE**: *"Use only for the sites, pests, and application methods described on this label."*

6. Revise the **USE SITES** and **USE RESTRICTIONS** sections on sublabel A to state:
USE SITES: *"This product may be used only to control Norway Rats, Roof Rats, and House Mice. This product may be used inside and outside within 50 feet of industrial, agricultural, related port or terminal buildings, and similar man-made structures. This product may also be used within 50 feet of surrounding buildings in alleys and inside transport vehicles (ships, trains, aircraft)."*

USE RESTRICTIONS: *"Do not use this product in sewers. Do not place near or inside ventilation duct openings. Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment or surfaces that come into direct contact with food. Do not use in homes or human residences. Do not broadcast bait. Do not apply further than 50 feet from buildings. Do not sell this product in individual containers holding less than 4 pounds of bait."*

7. Revise the **USE SITES** and **USE RESTRICTIONS** sections on sublabel B to state:
USE SITES: *"This product may be used only to control Norway Rats, Roof Rats, and House Mice. This product may be used inside and outside within 50 feet of homes, industrial, agricultural buildings, related port or terminal buildings, and similar man-made structures. This product may also be used*

within 50 feet of surrounding buildings in alleys and inside transport vehicles (ships, trains, aircraft)."

USE RESTRICTIONS: *"Do not use this product in sewers. Do not place near or inside ventilation duct openings. Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment or surfaces that come into direct contact with food. Do not broadcast bait. Do not apply further than 50 feet from buildings. Do not sell this product in individual containers holding less than 4 pounds of bait."*

8. At the end of "IMPORTANT" and immediately before "USE SITES" add: *"Note: Bait stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait."*

9. Make the following revisions to the **SELECTION OF TREATMENT AREAS** section on sublabels A and B:

- a. Revise the first sentence to read *"Determine areas where rats and mice will most..."*
- b. Revise the second sentence to read *"...or in locations where rats and mice or their signs have been seen."*

10. Make the following revisions to the **APPLICATION DIRECTIONS** section on sublabels A and B:

- a. Revise *"Individual rodents..."* to read *"Individual rats and mice..."*
- b. Add *"in infested areas"* after *"...packs per placement location."* in the **Rats** section and after *"...per placement"* in the **Mice** section.

11. Make the following revisions to the **Follow-Up** section on sublabels A and B:

- a. Replace *"rodent"* with *"rat and mouse"* where ever it is mentioned.
- b. Replace *"rodents"* with *"rats and mice"* where ever it is mentioned.
- c. Revise *"Collect and..."* to read *"Wearing gloves, collect...dead rats and mice and leftover bait."*

12. Revise the **STORAGE AND DISPOSAL** statement on sublabels A and B to read:

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store only 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 must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. **[Plastic:]** Triple rinse (or equivalent), then offer for recycling or recondition; or puncture and dispose of in a sanitary landfill; or by incineration. In most states, burning is not allowed. **[Paper:]** Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration. In most states, burning is not allowed.¹

13. As stated in 40CFR156.140(a)(4), a batch code must be included on the label or package for container and containment for nonrefillables.

14. Include *"It is illegal to sell these placepacks individually"* prominently on the front panel of your placepack label.

4013

Terms/Conditions of Sale/Distribution

The registrant must not sell or distribute product in a manner that results in sale in stores oriented towards residential consumers (e.g. grocery, drug, hardware, home improvement stores). The registrant may sell or distribute the product in a manner that results in sale in stores oriented towards agricultural consumers: (i.e. farm, agricultural, tractor stores) and pest control operators.

This product may not be sold in packaging that holds less than 4 pounds of bait.

With the above revisions, this product will be in full compliance with the Agency's revised May 28, 2008 "*Risk Mitigation Decision for Ten Rodenticides*".

Please be aware of the following stipulations concerning existing stocks:

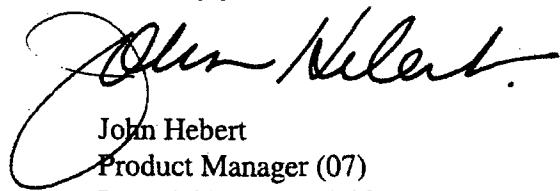
- The registrant may not distribute or sell existing stocks of this product after June 4, 2011 unless they conform to the terms and conditions of registration as amended today.
- Any person other than the registrant may sell and distribute existing stocks of this product with the previously approved label until such stocks are exhausted.
- Any person may use existing stocks of this product with the previously approved label until such stocks are exhausted.

Note: Should you wish to add a reference to the company's website on your label, please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, **regardless of whether a website is referenced on your product's label**, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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 constitutes acceptance of these conditions. If you have questions about this letter, please contact Jennifer Gaines at (703) 305-5967 or via e-mail at gaines.jennifer@epa.gov.

A stamped copy of the label is enclosed for your records.

Sincerely yours,



John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

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Note: This master label bears directions and sublabels for Agricultural/Industrial and Professional Use with use restrictions specific to the container size and user.

ASSAULT[®] MOUSE/RAT PLACE PACK

Contains Bitrex

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 17 2010

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

Sublabel A: Agricultural and Industrial Use

Sublabel B: Professional (PCO) Use

67517-81

ACTIVE INGREDIENT:

Bromethalin (CAS No. 63333-35-7) 0.01%

OTHER INGREDIENTS..... 99.99%

TOTAL 100.00%

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

EPA Reg. No.: 67517-81
EPA Est. No.: 67517-MO-1

6013

FRONT PANEL - Immediate Container - Sublabel A

ASSAULT[®] MOUSE/RAT PLACE PACK

Contains Bitrex

For Use In and Around Agricultural Buildings and Industrial Sites Only

Fast and Effective Indoor and Outdoor Rodent Control
Kills House Mice, Norway Rats and Roof Rats

Sublabel A: Agricultural and Industrial Use

House Mice, Norway Rats and Roof Rats usually consume a lethal dose in a single feeding. It may take two or more days from time of bait consumption for rodents to die. Due to Stop Feed Action, rodents cease feeding after consuming a toxic dose. This product is effective against anticoagulant-resistant mice and rats.

ACTIVE INGREDIENT:

Bromethalin (CAS No. 63333-35-7)..... 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

MAY BE HARMFUL IF EATEN
BY CHILDREN OR PETS

EPA Reg. No.: 67517-81

EPA Est. No.: 67517-MO-1

NET CONTENTS: 44 to 500 X 1.5 oz. PLACE PACKS

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

Lot/Code/Product/Revision Numbers as Needed
Precautionary Labeling Must Meet Type Size and Prominence Requirements

Mfg. & Printed in U.S.A.

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SIDE/BACK PANEL – Sublabel A

**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

Have the product container or label with you when calling a poison control center or doctor for treatment. You may also contact the Hotline Number 1-800-858-7378 for health concerns, emergency medical treatment information or pesticide incidents.

- If Swallowed**
- Call a poison control center, doctor, or HOT LINE NUMBER 1-800-858-7378 immediately for treatment advice.
 - Have person sip a glass of water if able to swallow.
 - Do not induce vomiting unless told to do so by a poison control center or doctor.
 - Do not give anything by mouth to an unconscious person.

- If On Skin or Clothing**
- Take off contaminated clothing.
 - Rinse skin immediately with plenty of water for 15-20 minutes.
 - Call a poison control center, doctor, or HOT LINE NUMBER 1-800-858-7378 immediately for treatment advice.

NOTE TO PHYSICIAN

This product 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.

80913

SIDE/BACK PANEL – Sublabel A

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 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 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 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.

USE SITES: This product may be used to control Norway Rats, Roof Rats and House Mice in and around 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.

USE RESTRICTIONS: Do not use this product 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 place packs or bait. Bait Stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait. Do not use in homes or other human residences. Do not apply further than 50 feet from agricultural buildings. Do not sell this product in individual containers holding less than 4 pounds of 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. Remove as much alternative food accessible to rodents as possible.

APPLICATION DIRECTIONS: The active ingredient in this product is different from anticoagulant rodenticides. Individual rodents cease feeding after consuming a toxic dose.

Rats: Apply 1 to 4 place packs per placement location. Space placements at intervals of 15 to 30 feet. The bait in a single place pack could only be expected to control one to three rats

Mice: Apply one place pack per placement. Space placements at intervals of 8 to 12 feet.

90A13

SIDE/BACK PANEL – Sublabel A

DIRECTIONS FOR USE (CONTINUED)

Follow-Up: Adjust the amount of bait applied to the level of rodent feeding expected at each bait placement location. Highest bait consumption is expected to occur on 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 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 only 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: Nonrefillable container. Do not reuse or refill this container. Dispose of container in a sanitary landfill or by incineration if allowed by state or local authorities. If burned stay out of smoke.

NOTICE OF WARRANTY

Buyer assumes all responsibility for safety and use not in accordance with directions.

100213

FRONT PANEL - Immediate Container - Sublabel B

ASSAULT[®] MOUSE/RAT PLACE PACK

Contains Bitrex

This product may only be used inside and within 50 feet of buildings or inside of transport vehicles (ships, trains or aircraft)

Fast and Effective Indoor and Outdoor Rodent Control
Kills House Mice, Norway Rats and Roof Rats

Sublabel B: Professional (PCO) Use

House Mice, Norway Rats and Roof Rats usually consume a lethal dose in a single feeding. It may take two or more days from time of bait consumption for rodents to die. Due to Stop Feed Action, rodents cease feeding after consuming a toxic dose. This product is effective against anticoagulant-resistant mice and rats.

ACTIVE INGREDIENT:

Bromethalin (CAS No. 63333-35-7) 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**

**MAY BE HARMFUL IF EATEN
BY CHILDREN OR PETS**

EPA Reg. No.: 67517-81

EPA Est. No.: 67517-MO-1

NET CONTENTS: 44 to 500.X 1.5 oz. PLACE PACKS

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13001 St. Charles Rock Road
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Lot/Code/Product/Revision Numbers as Needed
Precautionary Labeling Must Meet Type Size and Prominence Requirements

Mfg. & Printed in U.S.A.

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SIDE/BACK PANEL – Sublabel B

**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

Have the product container or label with you when calling a poison control center or doctor for treatment. You may also contact the Hotline Number 1-800-858-7378 for health concerns, emergency medical treatment information or pesticide incidents.

- If Swallowed**
- Call a poison control center, doctor, or HOT LINE NUMBER 1-800-858-7378 immediately for treatment advice.
 - Have person sip a glass of water if able to swallow.
 - Do not induce vomiting unless told to do so by a poison control center or doctor.
 - Do not give anything by mouth to an unconscious person.

- If On Skin or Clothing**
- Take off contaminated clothing.
 - Rinse skin immediately with plenty of water for 15-20 minutes.
 - Call a poison control center, doctor, or HOT LINE NUMBER 1-800-858-7378 immediately for treatment advice.

NOTE TO PHYSICIAN

This product 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.

SIDE/BACK PANEL – Sublabel B

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 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 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 SITES: This product may be used to control Norway Rats, 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.

USE RESTRICTIONS: Do not use this product 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 place packs or bait. Bait Stations are mandatory for outdoor, above-ground use. Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds may access the bait. This product may only be used inside and within 50 feet of buildings or inside of transport vehicles (ships, trains, or aircraft). Do not sell this product in individual containers holding less than 4 pounds of bait. This product may be applied only by licensed pest control operators (PCO's).

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: The active ingredient in this product is different from anticoagulant rodenticides. Individual rodents cease feeding after consuming a toxic dose.

Rats: Apply 1 to 4 place packs per placement location. Space placements at intervals of 15 to 30 feet. The bait in a single place pack could only be expected to control one to three rats

Mice: Apply one place pack per placement. Space placements at intervals of 8 to 12 feet.

SIDE/BACK PANEL – Sublabel B

DIRECTIONS FOR USE (CONTINUED)

Follow-Up: Adjust the amount of bait applied to the level of rodent feeding expected at each bait placement location. Highest bait consumption is expected to occur on 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 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 only 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: If Empty, Nonrefillable container. Do not reuse or refill this container. Dispose of container in a sanitary landfill or by incineration if allowed by state or local authorities. If burned stay out of smoke.

NOTICE OF WARRANTY

Buyer assumes all responsibility for safety and use not in accordance with directions.