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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

December 18, 2006

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Scimetrics Ltd. c/o RegWest Company, LLC 30856 Rocky Road Greeley, CO 80631-9375

Attention: Ms. Kim Davis

Subject

Kaput® Rat and Mouse Bait

EPA Reg. No. 72500-6

Your submissions received August 18, December 8, and December 12,

2006

Purpose

These submissions revise the packaging and label for this product, under sec 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), including the addition of a "Two Pack" (2, 2oz place packs) and the addition to the label of "voles" to the current text that "First dead rats and mice will appear 4 to 5 days after feeding begins".

Label

The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling to us, with the following changes, before you ship the product.

- 1. As documented in MRID No. 465290-01 (pp 1, 9, 12, and 15), the revised statement, "First dead rats, mice **and voles** will appear 4 to 5 days after feeding begins.", is acceptable.
- 2. At your option, you may delete the chemical name of Warfarin.
- 3. On your Sub-Label B (Outer Package), under "Application Directions", delete the "4 oz size" rat directions, since there is no outer container for the 4 oz size.

Labelcontinued

- 4. On your Sub-Label B (Outer Package), under "Application Directions", revise the 2nd Sentence for your 12 oz size as "This 6 pack package contains enough bait to kill 3 to 6 rats."
- 5. On your Sub-Label C (two-pack), change "Not For Individual Sale" to "It is illegal to sell these place packs individually."
- 6. On your Sub-Label C (two-pack), revise the first two sentences of the Rat "Application Directions" as follows: "Place two packs at point of highest rat activity. This two-pack package contains enough bait to kill 1 or 2 rats. Delete "Space placements at 8-12 foot intervals." since you only have enough bait for one (1) placement.

Existing stocks Forms

Stocks of product with existing labels may be used for eighteen (18) months.

Consequence for non-compliance

If this condition is 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.

Questions

If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-305-6596 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,

Der

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

Attachment

Stamped Label

File Location Dan Peacock, Flash Drive 1gb, E:\Warfarin\72500-6, rev label, add 2, 2 oz place pack label, vole claim, 12-12-2006.doc

Kaput® Rat & Mouse Bait

Master Label

Master Label Includes:

Sub-Label A: Box/Pail Outer Label

Sub-Label B: Place Pack Label (Unit Packaging)

Sub-Label C: Alternate Place Pack Label (When Sold as a Two-Pack)

Kills Norway Rats, Roof Rats, House Mice and Voles
[Now Kills Voles Too!]

First dead rats, mice and voles will appear 4 to 5 days after feeding begins.

Active Ingredient:

 Warfarin, 3-(alpha-Acetonylbenzyl-4-hydroxycoumarin)
 0.025%

 Other Ingredients
 99.975%

 Total
 100.000%

Keep Out of Reach of Children CAUTION

Harmful if swallowed.

ACCEPTED
with COMMENTS
_EPA Letter Dated

See back panel for additional precautionary statements.

DEC 18 2006

EPA Reg. No. 72500-6

EPA Est. 72500-CO-1 [Inder the Federal Insectedds.

Under the Federal Insections, Pungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Res. No.

72500-6

Net Weight: 2 oz. (56 grams)

{Unit Packaging}:

4 oz (2 packs x 2 oz.)

[12 oz. (6 packs x 2 oz.)] [9.38 lbs. (75 packs x 2 oz.)]

[12.5 lbs. (100 packs x 2 oz.)]

[22.5 lbs. (180 packs x 2 oz.)]

[25 lbs. (200 packs x 2 oz.)]

Manufactured by: Scimetrics Ltd. Corp

P.O. Box 1045

Wellington, CO 80549

New Solutions to Old Problems

^[] Denotes optional/alternate language

^{ } Denotes language that does not appear on the market label

72500-6 New Label: Page 2 of 9 08/17/06 (Revised 12/12/06)

Sub-Label A: Box/Pail Outer Label

(Front Panel)

Kaput® Rat & Mouse Bait Place Packs

Kills Norway Rats, Roof Rats, House Mice and Voles
[Now Kills Voles Too!]
First dead rats, mice and voles will appear 4 to 5 days after feeding begins.

Keep Out of Reach of Children
CAUTION
Harmful if swallowed.
See back panel for additional precautionary statements.

EPA Reg. No. 72500-6

EPA Est. 72500-CO-1

Net Weight:

{Unit Packaging}:

[12 oz. (6 packs x 2 oz.)]

[9.38 lbs. (75 packs x 2 oz.)]

[12.5 lbs. (100 packs x 2 oz.)]

[22.5 lbs. (180 packs x 2 oz.)]

[25 lbs. (200 packs x 2 oz.)]

Manufactured by:
Scimetrics Ltd. Corp
P.O. Box 1045
Wellington, CO 80549
New Solutions to Old Problems

{Back Panel}

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 non-target 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 reach of children, pets, domestic animals and non-target wildlife, OR in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and children under six year 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, other potentially destructive animals or in areas prone to vandalism.

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3. Dispose of product container, unused, spoiled and unconsumed bait as specified on this label.

Do not apply this product for any pests or sites or by any application method not specified on this label.

USE RESTRICTIONS

Rats and Mice: Use this product to control Norway Rats, Roof Rats and House Mice. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come into contact with food. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in contact with food. Do not use this product within the occupied habitats of threatened or endangered *Peromyscus* spp. Mice. Voles: Use this product to control pine, meadow or mountain voles (*Microtus* spp.) around buildings. Do not expose bait on bare ground. Use only for hand application; do not broadcast. Wear gloves if bait or carcasses are handled.

URBAN AREAS

Rats and Mice: Use this product in and around homes, and industrial, commercial and public buildings. This product is also for use in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. Applications "around" buildings must be made in tamper-resistant bait stations placed along walls or other external parts of buildings (e.g. doorways, ramps, loading docks) where rats or mice might seek to gain entrance.

NON-URBAN AREAS

Rats and Mice: In non-urban areas, use this product only in and around homes and agricultural buildings. If applied in secured, tamper-resistant bait stations, this product may also be used in parks, woodlots, yards and lots surrounding residential buildings, and non-crop areas near agricultural buildings.

SELECTION OF TREATMENT AREAS

Rats and Mice: Determine areas where rats or mice will most likely find and consume bait. Generally, these are along walls, by gnawed openings, in corners and concealed places, between floors or walls, or in locations where rodents or their signs have been seen. Remove as much alternative food as possible. Voles: Select areas near building (such as flowerbeds, shrubs and bushes) where voles or their damage (eating of bulbs, girdling of plants) have been observed. Also look for well-defined runways intersecting with holes.

APPLICATION DIRECTIONS

{4 oz. size:}

Rats: Place at least 2 packs per placement. This package contains enough bait to kill 1 or 2 rats. Space placements at 15-30 foot intervals. Maintain an uninterrupted supply of fresh bait for 10 days or until signs of rat activity cease.

{12 oz. size:}

Rats: Place at least 2-6 packs per placement. This package contains enough bait to kill 3 or 4 rats. Space placements at 15-30 foot intervals. Maintain an uninterrupted supply of fresh bait for 10 days or until signs of rat activity cease.

(9.38 through 25 pounds sizes:)

Rats: Place at least 2-8 packs per placement. Space placements at 15-30 foot intervals. Maintain an uninterrupted supply of fresh bait for 10 days or until signs of rat activity cease.

Mice: Place one pack per placement. Space placements at 8-12 foot intervals. Maintain an uninterrupted supply of fresh bait for 15 days or until signs of mouse activity cease.

Rats and Mice: Immediately replace contaminated or spoiled bait. Properly collect and dispose of all visible dead animals and leftover bait. To discourage reinfestation, limit sources of rodent food, water and harborage as much as possible. If reinfestation occurs, repeat treatment. For a continuous infestation, set up permanent bait stations and replenish bait as needed.

Voles: Hand Spot Baiting: Open pack and place about 1 oz of bait in each active hole or runway. Cover with a shingle, board or grass to increase bait consumption. If children, pets, birds or nontarget mammals are present,

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place bait in tamper-resistant bait stations. Check placements daily and remove stale bait and any carcasses. Maintain an uninterrupted supply of fresh bait for 15 days or until signs of vole activity cease. Follow-up: At the end of the control program dispose of carcasses and any uneaten bait.

{The following will be used for the 4 and 12 oz. sizes:}

Storage and Disposal

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

Storage: Store in original container in a cool, dry place inaccessible to children and pets. Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

{The following will be used for the 9.38 through 25 lbs. sizes:}

Storage and Disposal

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

Storage: Store in original container in a cool, dry place inaccessible to children and pets. 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: {Plastic:} 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. {Paper:} Dispose of empty paper box in a sanitary landfill or by incineration; or if allowed by state and local authorities, by burning; if burned stay out of smoke.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals CAUTION

Keep away from humans, domestic animals and pets. Harmful if swallowed or absorbed through the skin because this material may reduce the clotting ability of blood and cause bleeding. Do not get in eyes, on skin or clothing. Wash arms, hands and face with soap and water after applying and before eating or smoking.

First Aid

Have the product container or label with you when calling a poison control center or doctor or going for treatment. **If swallowed,** call a poison control center, doctor or 1-800-858-7378 for immediate treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.

Notice to Physician or Veterinarian

This material may reduce the clotting ability of blood and cause bleeding. If ingested, administer Vitamin K-1 intramuscularly or orally. Repeat as necessary based on monitoring of prothrombin times.

Environmental Hazards

This product is toxic to fish and wildlife. Do not apply directly to water.

Warranty: Manufacturer and Seller make no warranty of merchantability, fitness for any purpose, or otherwise express or implied, concerning this product or its use which extend beyond the statements on this label.

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Sub-Label B: Place Pack Label (Unit Packaging)

(Front Panel)

Kaput® Rat & Mouse Bait Place Pack

Kills Norway Rats, Roof Rats, House Mice and Voles
[Now Kills Voles Too!]
First dead rats, mice and voles will appear 4 to 5 days after feeding begins.

Active Ingredient:

Warfarin, 3-(alpha-Acetonylbenzyl-4-hydroxycoumarin)	0.025%
Other Ingredients	
Total	

Keep Out of Reach of Children
CAUTION
Harmful if swallowed.
See back panel for additional precautionary statements.

EPA Reg. No. 72500-6

EPA Est. 72500-CO-1

Net Weight: 2 oz. (56 grams)

Manufactured by:
Scimetrics Ltd. Corp
P.O. Box 1045
Wellington, CO 80549
New Solutions to Old Problems

{Back Panel}

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read the entire label on the outer package before using this product. It is illegal to sell these place packs individually.

Storage and Disposal

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

Storage: Store in original container in a cool, dry place inaccessible to children and pets. **Disposal:** If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency of 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals CAUTION



72500-6 New Label: Page 6 of 9 08/17/06 (Revised 12/12/06)

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72500-6 New Label: Page 7 of 9 08/17/06 (Revised 12/12/06)

Sub-Label C: Alternate Place Pack Label (When Sold as a Two-Pack)

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Kills Norway Rats, Roof Rats, House Mice and Voles
[Now Kills Voles Too!]
First dead rats, mice and voles will appear 4 to 5 days after feeding begins.

Active Ingredient:

Warfarin, 3-(alpha-Acetonylbenzyl-4-hydroxycoumarin)		
Other Ingredients	99.975 <u>%</u>	
Total		

Keep Out of Reach of Children
CAUTION
Harmful if swallowed.
See back panel for additional precautionary statements.

EPA Reg. No. 72500-6

EPA Est. 72500-CO-1

Net Weight: 2 oz. (56 grams) Not For Individual Sale

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Mice: Place one pack per placement. Space placements at 8-12 foot intervals. Maintain an uninterrupted supply of fresh bait for 15 days or until signs of mouse activity cease.

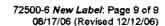
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PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals CAUTION

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