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

OFFICE OF CHEMICAL, SAFETY AND POLLUTION PREVENTION

MAY - 8 2012

PelGar International c/o AB Bait Co. 60 W. Broad St., suite 99c Bethlehem, PA 18018

Subject: Amendment to add new 100' restriction EPA Registration No.: 87235-1; 87235-2 Primary Brand Names: BRIGAND SB Soft Bait Rodenticide; BRIGAND WB Wax Block Rodenticide Submission Date: April 20, 2012

Dear Mr. Branc:

The label referred to above, submitted under FIFRA, as amended, is **acceptable**. Per 40 CFR 156.10(a)(6), submit one copy of your final printed labeling before you release the product for shipment. As defined in 40 CFR 152.3, "final printed labeling" means the "label or labeling of the product when distributed or sold." Clearly legible reproductions or photo reductions will be accepted for unusual labels. Note that a clean copy of the master label in most cases does not meet the definition of final printed labeling. If you have any questions, please contact Gene Benbow at (703) 347-0235 or via email at <u>benbow.gene@epa.gov</u>.

Sincerely,

Ven

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

Brigand WB Label

EPA Reg. No. 87235-2

[Large Transport Container Label - Front Panel]

BRIGAND WB Wax Block Rodenticide

	Bromadiolone (CAS #28772-56-7):	0.005%
Under the Federal Insecticit Fungicide, and Rodenticide as amended, for the pestic Registered under EPA Reg. No. 87235	AC, Act, Total *Contains Denatonium Benzoate -2	<u>99.995%</u> 100.000%

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Keep away from children, domestic animals and pets.

Personal Protective Equipment (PPE)

All handlers (including applicators) must wear long-sleeved shirt, long pants, shoes, socks, and water-proof gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof 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.

I	FIRST AID Have label with you when obtaining treatment advice.
If swallowed	 Call a poison control center, doctor, or 1-800-222-1222 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 the poison control center or doctor.
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 1-800-222-1222 immediately for treatment advice.

EPA Reg. No. 87235-2

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Brigand WB Label

If in the eyes	•Hold eye open and rinse slowly and gently with water for 15-20 minutes.
	•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
	•Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.

NOTE TO PHYSICIAN

If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. If ingested, administer Vitamin K1 intramuscularly or orally. Repeat as necessary based on monitoring of prothrombin times.

TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian at once.

NOTE TO VETERINARIAN

Anticoagulant Bromadiolone: For animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K_1 . If needed, check prothrombin times every 3 days until values return to normal (up to 30 days). In severe cases, blood transfusions may be needed.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten bait. 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. Do not contaminate water when disposing of equipment wash water or rinsate.

DISCLAIMER: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions

Net Weight: Manufactured by: PelGar International Ltd. Unit 13 Newman Lane Alton, Hampshire GU34 2QR, UK EPA Reg. No. 87235-2 EPA Est. No. 87235-GB-001

Imported by: AB Bait Co. Bethlehem, PA 1-610-849-1723 Brigand WB Label

EPA Reg. No. 87235-2

[PCO Outer Container Label – Front Panel]

BRIGAND WB Wax Block Rodenticide

KILLS RATS AND MICE KILLS WARFARIN RESISTANT NORWAY RATS

ACTIVE INGREDIENT:	
Bromadiolone (CAS #28772-56-7):	0.005%
INERT INGREDIENTS*:	
Total	100.000%
*Contains Denatonium Benzoate	

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for additional precautionary labeling.

Net Weight: 18 lbs Manufactured by: PelGar International Ltd. Unit 13 Newman Lane Alton, Hampshire GU34 2QR, UK EPA Reg. No. 87235-2 EPA Est. No. 87235-GB-001

Imported by: AB Bait Co. Bethlehem, PA 1-610-849-1723

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[PCO Outer Container Label – Side/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. Use only for the sites, pests, and application methods described on this label.

IMPORTANT: Do not expose children, pets, or nontarget animals to rodenticides. To help to prevent accidents:

1. Store unused product 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 bait 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, or unconsumed bait as specified on this label.

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.

USE RESTRICTIONS

This product can only be used to control Norway rats, roof rats, and house mice *in and within* 100 feet of man-made structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations. Examples of such structures include homes and other permanent or temporary residences, food processing facilities, industrial and commercial buildings, trash receptacles, agricultural and public buildings, transport vehicles (ships, trains, aircraft), docks and port of terminal buildings and related structures around and associated with these sites. Fence and perimeter baiting, beyond 100 feet from a structure as defined above, is prohibited. This product must not be applied directly to food or feed crops. Do not broadcast bait. Burrow baiting with Brigand Wax Blocks is prohibited.

Do not sell this product in individual containers holding less than 16 pounds of bait.

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

APPLICATION DIRECTIONS: Each **Brigand Wax Block** weighs approximately 1 ounce (28.00 grams).

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Norway Rats and Roof Rats: Apply 4 to 16 blocks per placement for controlling rats. Space placements 15 to 30 feet apart at appropriate locations within the infested area. Maintain a continuous supply of fresh bait for at least 10 days or until signs of new feeding by rats on bait cease to appear.

House Mice: Apply 1 bait block per placement, usually spaced 8 to 12 feet apart. Two blocks may be needed at points of very high mouse activity. Maintain a constant supply of fresh bait for 15 days or until signs of mouse activity cease.

Follow-up: Replace contaminated or spoiled bait immediately. Wearing waterproof gloves collect and properly dispose of dead animals and leftover blocks, as well as any bait that has become accessible to non-target animals. To discourage re-infestation, limit sources of rodent food, water, and harborage as much as possible. If re-infestation does occur, repeat treatment. For continuous sources of infestation, set up permanent bait stations and replenish them as needed.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Keep away from children, domestic animals and pets.

Personal Protective Equipment (PPE)

All handlers (including applicators) must wear long-sleeved shirt, long pants, shoes, socks, and waterproof gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof 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.

Ι	FIRST AID Have label with you when obtaining treatment advice.
If swallowed	 Call a poison control center, doctor, or 1-800-222-1222 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 the poison control center or doctor.
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 1-800-222-1222 immediately for treatment advice.

If in eyes

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Hold eye open and rinse slowly and gently with water for 15-20 minutes.
Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

•Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.

NOTE TO PHYSICIAN

If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. If ingested, administer Vitamin K₁ intramuscularly or orally. Repeat as necessary based on monitoring of prothrombin times.

TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian at once.

NOTE TO VETERINARIAN

Anticoagulant Bromadiolone: For animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K_1 at [insert dose if known]. If needed, check prothrombin times every 3 days until values return to normal (up to 30 days). In severe cases, blood transfusions may be needed.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten bait. 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. Do not contaminate water when disposing of equipment wash water or rinsate.

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 placed in trash or delivered to an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. **Pesticide Container:** Triple rinse (or equivalent) then offer for recycling or

reconditioning; or puncture and dispose of in a sanitary landfill; or incineration

DISCLAIMER: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions

Brigand WB Label

EPA Reg. No. 87235-2

[Agricultural Building Use Outer Container Label – Front Panel]

Brigand WB – Agricultural Building Use

For Use In and Around Agricultural Buildings Only

FOR INDOOR AND OUTDOOR USE

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for additional precautionary labeling.

Net Weight: 8 lbs (2 pails X 4 lbs each) or 8 pounds up to 22 pounds Statement required on label of inner packages holding less than 8 pounds of bait: It is illegal to sell this product in individual containers holding less than 8 pounds of bait.

Manufactured by: PelGar International Ltd. Unit 13 Newman Lane Alton, Hampshire GU34 2QR, UK EPA Reg. No. 87235-2 EPA Est. No. 87235-GB-001 Imported by: AB Bait Co. Bethlehem, PA 1-610-849-1723 [Agricultural Building Use Outer Container Label – Side/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. Use only for the sites, pests, and application methods described on this label.

IMPORTANT: Do not expose children, pets, or non-target animals to rodenticides. To help to prevent accidents:

1. Store unused product 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 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 bait 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, or unconsumed bait as specified on this label.

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.

USE RESTRICTIONS

This product may only be used to control Norway rats, roof rats, and house mice *in and within* 100 feet of agricultural buildings and man-made agricultural structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations. Fence and perimeter baiting, beyond 100 feet from an agricultural structure as defined above, is prohibited. This product must not be applied directly to food or feed crops. Do not broadcast bait. Burrow baiting with Brigand Wax Blocks is prohibited.

Do not sell this product in individual containers holding less than 8 pounds of bait.

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

APPLICATION DIRECTIONS: Each **Brigand Wax Block** weighs approximately 1 ounce (28.00 grams).

Norway Rats and Roof Rats: Apply 4 to 16 blocks per placement for controlling rats. Space placements 15 to 30 feet apart at appropriate locations within the infested area. Maintain a continuous supply of fresh bait for at least 10 days or until signs of new feeding by rats on bait cease to appear.

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Brigand WB Label

of fresh bait for 15 days or until signs of mouse activity cease.

Follow-up: Replace contaminated or spoiled bait immediately. Wearing waterproof gloves collect and properly dispose of dead animals and leftover blocks, as well as any bait that has become accessible to non-target animals. To discourage re-infestation, limit sources of rodent food, water, and harborage as much as possible. If re-infestation does occur, repeat treatment. For continuous sources of infestation, set up permanent bait stations and replenish them as needed.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Keep away from children, domestic animals and pets.

Personal Protective Equipment (PPE)

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If swallowed	 Call a poison control center, doctor, or 1-800-222-1222 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 the poison control center or doctor.
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 1-800-222-1222 immediately for treatment advice.

EPA Reg. No. 87235-2

If in eyes	•Hold eye open and rinse slowly and gently with water for 15-20 minutes.
	•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
	•Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.

NOTE TO PHYSICIAN

If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. If ingested, administer Vitamin K1 intramuscularly or orally. Repeat as necessary based on monitoring of prothrombin times.

TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian at once.

NOTE TO VETERINARIAN

Anticoagulant Bromadiolone: For animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K_1 at [insert dose if known]. If needed, check prothrombin times every 3 days until values return to normal (up to 30 days). In severe cases, blood transfusions may be needed.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten bait. 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. Do not contaminate water when disposing of equipment wash water or rinsate.

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 placed in trash or delivered to an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. **Pesticide Container:** Triple rinse (or equivalent) then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or incineration.

DISCLAIMER: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.