



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460**

**OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION**

October 25, 2022

Renee Warner  
Analyst, Regulatory Affairs  
Scotts Miracle-Gro  
PO Box 190  
Marysville, OH 43040

Subject: Label Amendment – Address the Agency Initiated Letters 03-14- 2022 and 04-27-2022: Optional marketing claims under Palatability are to be presented as one continuous claim and formatted consistently on the final printed label with the same background, font color and font size; inclusion of the product logo; use of the EPA Reg. No. for the referenced Scotts’ comparison product will not be on the final printed label, and addition of an Alternative Brand Name.

Product Name: TC Rat Killer 122-Purple

EPA Registration Number: 90780-13

Application Date: March 14, 2022

Decision Number: 582572

Dear Renee Warner:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

The alternate brand name, “Tomcat Advanced Brand Rat & Mouse Bait with Disposable Station” has been added to the product record.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. Products shipped after 12 months from the date of this letter or the next printing of your label, whichever occurs first, must bear the new revised label.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under FIFRA 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) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced

Page 2 of 2  
EPA Reg. No. 90780-13  
Decision No. 582572

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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Ralph Narain at 202-566-2853 or at [Narain.Ralph@epa.gov](mailto:Narain.Ralph@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'VE', followed by a horizontal line extending to the right.

Venus Eagle, Product Manager 01  
Invertebrate and Vertebrate Branch 3  
Registration Division (7505T)  
Office of Pesticide Programs

Enclosure: Stamped label

**OUTER PACKAGE - COMPLETE LABEL**

# TC RAT KILLER 122-PURPLE

**This Bait Station is Resistant to Weather and to Tampering by Children and Dogs.  
For Use Indoors and Outdoors.**

ACTIVE INGREDIENT :  
Bromethalin (CAS #63333-35-7): ..... 0.01 %  
OTHER INGREDIENTS\* : ..... 99.99%  
100.00%

\*Contains Denatonium Benzoate

## KEEP OUT OF REACH OF CHILDREN CAUTION

See back [bottom] [and] [side] [panel/panels] for First Aid, Additional Precautionary Statements, and Directions for Use.

Available Exclusively From [Distributed by] [Sold by] [Manufactured For]:  
Tomcat Brands  
PO Box 190  
Marysville, OH 43040  
[www].[tomcat.com]

EPA Reg. No. 90780-13  
EPA Est. No. 12455-WI-1<sup>k</sup>, 12455-WI-2<sup>p</sup>, 12455-WI-3<sup>w</sup>  
[Superscript is first letter of lot number]  
[phone icon] Questions or Comments?  
¿Preguntas o Comentarios?  
[1-877-332-0755] [[www.tomcat.com](http://www.tomcat.com)] [[tomcat.com](http://tomcat.com)] [computer icon]

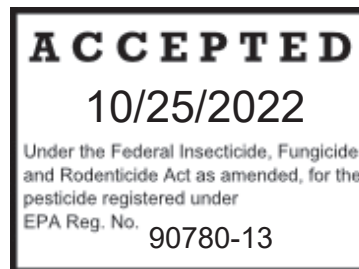


© 20XX, [Licensed by] Tomcat [Brands]. World rights reserved  
[patent pending]

**ABNs:**

- Tomcat Rat & Mouse Killer Disposable Bait Station
- Tomcat Rat & Mouse Disposable Bait Station
- Tomcat Advanced Brand Rat & Mouse Bait with Disposable Station

NET WT:  
4 oz. to 16 oz.  
4 oz. x 1 Bait Station (113g)      4 oz. x 4 Bait Stations (454g)



<b>FIRST AID</b>	
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"><li>• Call a poison control center, doctor, or 1-877-465-5161 immediately for treatment advice</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor</li></ul>
<b>IF ON SKIN:</b>	<ul style="list-style-type: none"><li>• Wash with plenty of soap and water.</li></ul>
<b>HAVE LABEL WITH YOU WHEN OBTAINING TREATMENT ADVICE</b>	
<b>TREATMENT FOR PET POISONING</b> If an animal eats this bait, call a veterinarian at once.	
<b>NOTE TO PHYSICIAN OR VETERINARIAN</b>	
Contains the nerve poison bromethalin. This product 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.	

#### **PRECAUTIONARY STATEMENTS**

##### **Hazards to Humans and Domestic Animals**

**CAUTION:** Bait contents harmful if swallowed. Keep away from children, domestic animals and pets. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.

**USER SAFETY REQUIREMENTS:** As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco, or using the toilet.

#### **ENVIRONMENTAL HAZARDS**

This product is extremely toxic to fish, birds and other wildlife. Dogs and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply this product directly to water.

#### **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.

##### **USE RESTRICTIONS:**

This bait station may be used in areas accessible to children and pets, consistent with all use restrictions and other requirements indicated on this label. Do not apply further than 50 feet from home or building.

For control only of rats and house mice. This product [TC RAT KILLER 122-PURPLE] must be used in and around buildings consistent with all use restrictions and other requirements indicated on this label. Do not place this bait station in any area where there is a possibility of contaminating food or surfaces that come into direct contact with food.

**Note to PM: Either Option 1 or Option 2 presentation will be listed on the final printed label.**

[Option 1]

**SELECTION OF TREATMENT AREAS [Indoors & Outdoors]:** Determine areas where rats and/or house mice will most likely find and consume the bait. Generally, these areas are beside burrows, along walls, by gnawed openings, in corners and concealed places.

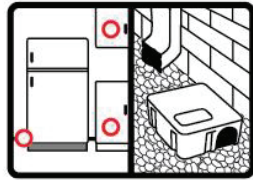
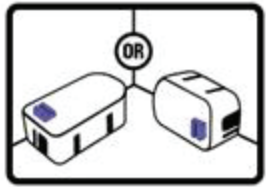

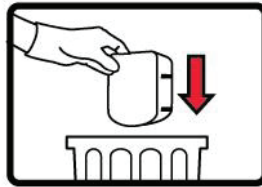
**APPLICATION DIRECTIONS:**

Place the bait station at point of highest activity beside burrows, along a wall or in corners where signs of rats or house mice have been seen. If additional units are purchased, place bait stations at 15- to 30- foot intervals. Maintain a constant supply of fresh bait for 10 days or until there no longer are fresh signs of rat or house mouse activity in infested areas. Replace bait stations if bait is consumed or contaminated. View bait via see-through lid and replace station if bait has been consumed or contaminated and rats and/or house mice still are using the bait station.

**Follow-up:** Wearing gloves, collect and properly dispose of emptied bait stations or carcasses. To discourage re-infestation, eliminate food, water and harborage as much as possible. If re-infestation does occur, repeat treatment.

[Option 2]

**APPLICATION DIRECTIONS**

<p><b>1. Selection of Treatment Areas [Indoors &amp; Outdoors]</b></p> 	<p><b>2. Placing Bait Stations</b></p> 	<p><b>3. Monitor</b></p> 	<p><b>4. Follow Up</b></p> 
<p>Determine areas where rats and/or house mice will most likely consume the bait. Generally, these areas are beside burrows, along walls, by gnawed openings, in corners and concealed places.</p>	<p>Place the bait station at the point of highest activity beside burrows, along a wall or in corners where signs of rats or house mice have been seen. If additional units are to be used, place bait stations at 15- to 30-foot intervals.</p>	<p>Maintain a constant supply of fresh bait for at least 10 days or until there no longer are signs of rat and/or house mouse activity in infested areas. View bait via see-through lid and replace station if bait has been consumed or contaminated and rats and/or house mice still are using the bait station.</p>	<p>Wearing gloves, collect and properly dispose of any emptied bait stations and/or carcasses. To discourage re-infestation, eliminate food, water and harborage as much as possible. If re-infestation does occur, repeat treatment.</p>

**STORAGE AND DISPOSAL**

**Pesticide Storage:** Store only in original container in a cool, dry place inaccessible to children and pets.  
**Pesticide Disposal and Container Handling:** Nonrefillable Container. Do not reuse or refill this container except as described in the Directions For Use.  
**If Empty:** Place in trash or offer for recycling if available.  
**If Partly Filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**Note to PM-Warranty/Guarantee or notice statements may or may not appear on market label**

**WARRANTY:** 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.

**Notice:** To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

Lot/batch # [to appear on outer packaging]

**BAIT STATION LABEL**

**TC RAT KILLER 122-PURPLE**

**This Bait Station is Resistant to Weather and to Tampering by Children and Dogs. For Use Indoors and Outdoors.**

ACTIVE INGREDIENT:  
Bromethalin (CAS #63333-35-7): .....0.01 %  
OTHER INGREDIENTS\*.....99.99%  
100.00%

\*Contains Denatonium Benzoate

EPA REG. NO. 90780-13  
12455-WI-1<sup>k</sup>, 12455-WI-2<sup>p</sup>, 12455-WI-3<sup>w</sup>  
[Superscript is first letter of lot number]

EPA EST. NO. 12455-WI-1

Net Wt.: 1 x 4 oz. (113g) block bait

**DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATION**

**CAUTION:** See outer packaging for, First Aid, Additional Precautionary Statements and Directions For Use.

If swallowed, call a poison control center, doctor, or 1-877-465-5161.

Lot/batch #  
Model number: RD1

**OPTIONAL MARKETING STATEMENTS:**

**Efficacy claims:**

1. Rats and [or] house mice usually consume a lethal dose in a single night's feeding but it may take two or more days from the time of consumption for these rodents to die.
2. Kills rats and house mice
3. Rats [and house mice] [or house mice] cease feeding after consuming a toxic dose
4. Rat and house mouse killer
5. Norway and Roof Rat Killer
6. Kills House Mice too!
7. 4 oz Block Kills up to 10 Rats\* \*based on no-choice laboratory testing
8. Each 4 oz Block Kills up to 10 Rats\* \*based on no-choice laboratory testing
9. Each station contains enough bait to kill up to 10 rats\* \*based on no-choice laboratory testing
10. [Includes] Enough bait to kill up to 10 rats\* \*based on no-choice laboratory testing
11. This package contains enough bait to kill up to 10 rats\* \*based on no-choice laboratory testing
12. Rats and house mice usually consume a lethal dose in a single night's feeding, but it may take two or more days from the time of consumption for them to die.
13. Kills up to 10 rats per bait block\* \*based on no-choice laboratory testing
14. Rats and house mice may enter, feed on the bait, and then leave the bait station.
15. [Includes] [This package includes[contains]] Enough bait to kill up to 10 [20] [30] [40] rats\* \* based on no-choice laboratory testing

**Bait Station Claims:**

16. Rat and house mouse bait station
17. Pre-baited [prefilled] bait station
18. See-thru lid [for easy bait monitoring]
19. Bait station with bromethalin
20. Contains one bait station prefilled with 4 oz. bait block.
21. Use for both house mouse and rat problems [issues] [infestations]
22. Contains 4 oz block bait pre-loaded into the bait station
23. Pre-filled [pre-baited], ready to use bait station
24. House mouse [Rat] feeding station
25. [Disposable] rat & house mouse bait station
26. 4 oz. of bait pre-loaded into [bait] station
27. 1 [2][3][4] disposable rat and house mouse bait station(s)
28. Station keeps bait away from children, pets & non-target animals
29. Ready to use
30. Child and dog resistant [bait] station
31. Station is child and dog resistant [bait] station
32. Child, dog, and weather resistant [bait] station
33. Weather resistant [bait] station
34. Can be used indoors and out
35. [For] use indoors and out
36. Indoor and outdoor
37. Durable [bait] station design is child and dog resistant
38. Station is child and dog resistant
39. Kid and Dog Tested [bait] station
40. Kid and Dog Resistant [Tested] [Bait] Station
41. Kid & Dog Tamper-Resistant [Bait] Station
42. Can be used horizontally or vertically
43. No need to touch the bait when placing station
44. [Clear lid for] easy bait monitoring
45. 1[2][3][4] Pre-Filled, Disposable Bait Station(s) [with a 4 oz block]
46. Bait station made from 71% recycled resin/content.
47. This bait station is not a trap
48. Use in kitchens
49. Use in kitchens behind appliances

50. Use inside kitchen cabinets
51. Use behind appliances & [and] inside cabinets
52. Use in kitchens, behind kitchen appliances, and [&] inside kitchen cabinets
53. Use in kitchens, behind appliances and [&] inside cabinets
54. Easy placement behind appliances and in cabinets for kitchen house mice
55. Easy placement behind appliances for kitchen house mice
56. Easy placement in cabinets for kitchen house mice
57. Can be placed behind kitchen appliances and [or] inside kitchen cabinets
58. Can be used behind kitchen appliances and [or] inside cabinets
59. Value Pack\* \* *Note to PM- Value pack would not exceed the 1 lb limit for any package sold at a discounted price*

Other/Guarantees

60. Made in USA
61. Kills rats and house mice [,] guaranteed [.,]+
62. Results Guaranteed+
63. Guaranteed to kill house mice and rats, or your money back.
64. Guaranteed to kill+

***Note to PM: this disclaimer below will be placed in the vicinity on the packaging as the optional marketing claim it supports***

+Tomcat [Brands] Guarantee [Satisfaction Guaranteed or Your Money Back] If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price

Palatability

65. Formulated for increased attractiveness to [for] house mice
66. Formulated for increased palatability to [for] house mice
67. Formulated for enhanced attractiveness to [for] house mice
68. Formulated for improved attractiveness to [for] house mice
69. Palatable bait formulation for house mice
70. Formulated for increased attractiveness and palatable bait formulation for house mice
71. Formulated for enhanced attractiveness and palatable bait formulation for house mice
72. Formulated for improved attractiveness and palatable bait formulation for house mice
73. Enhanced attractiveness to [for] house mice vs [versus] Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
74. Improved [bait] formulation to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
75. Enhanced [bait] formulation to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
76. Advanced [bait] formulation to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
77. More palatable [bait formulation] to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
78. More attractive to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
79. Advanced formula to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
80. Enhanced attractiveness [and] [improved palatability] to [for] house mice vs [versus] Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
81. Advanced formula to be a more palatable bait formulation to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
82. Advanced [bait] formula that is more palatable to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]



83. Advanced formula with increased palatability to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]
84. Advanced formula with more palatable bait [formulation] to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Disposable Station [EPA Reg. No.90780-9]

*Note to PM: Each of the above optional marketing claims under Palatability, claim nos. 65-84, will be presented as one continuous claim and will be formatted consistently on the final printed label with the same background, font color and font size. Further, the use of the EPA Reg. No. for the referenced Scotts' comparison product will not be included on the final printed label of this product.*

Other Claims

85. Utilize traps and bait stations together to control house mice and rats++ ++ mouse and rat traps sold separately
86. Use as part of an integrated pest management system
87. Indoor Placement: Kill house mice and rats in the home [house]

Disease Claims

88. Kills house mice [and rats] that may transmit disease[s] Leptospirosis (Weil's Disease), Salmonellosis, Lymphocytic Chorio-meningitis (LCM), Rat Bite Fever
89. Kills house mice [and rats] that may transmit Leptospirosis (Weil's Disease)
90. Kills house mice [and rats] that may transmit Salmonellosis
91. Kills house mice [and rats] that may transmit Lymphocytic Chorio-meningitis (LCM)
92. Kills house mice [and rats] that may transmit Rat Bite Fever

**OPTIONAL GRAPHICS:**

***NOTE TO PM: COLOR (RED) ON SOME OF THESE ILLUSTRATIONS MAY VARY IN SHADE AND/OR MAY CHANGE TO ANOTHER COLOR DEPENDING ON FINAL ARTWORK DESIGN- BAIT WILL ALWAYS BE DEPICTED AS PURPLE***





**CAN BE USED  
HORIZONTALLY OR VERTICALLY**



**HORIZONTAL**



**VERTICAL**

**SEE-THRU LID FOR  
EASY BAIT MONITORING**



**DISPOSABLE**



**CAN BE USED IN A  
VARIETY OF LOCATIONS**



**BEHIND APPLIANCES**



**IN CORNERS**



**GARAGES**



**BASEMENTS**


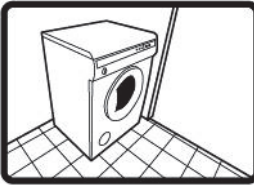
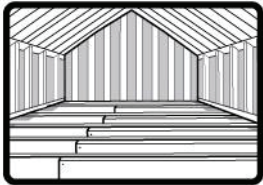

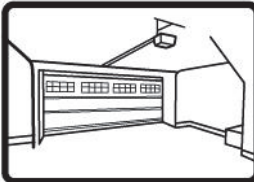
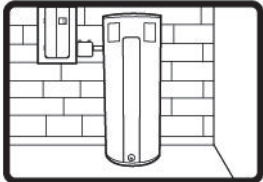
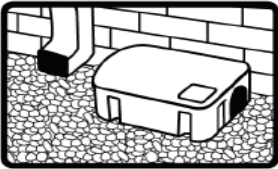


**ATTICS**

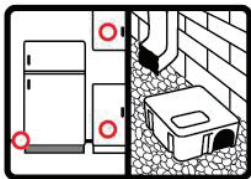


**EXTERIOR OF HOMES**

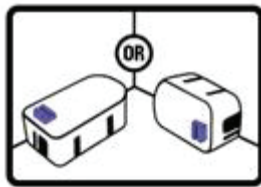
All use must be consistent with the **USE RESTRICTIONS** in the **DIRECTIONS FOR USE** section of this label.

	<p>BEHIND APPLIANCES</p> 	<p>IN ATTICS</p> 
<p>INSIDE CABINETS</p> 	<p>GARAGES</p> 	<p>BASEMENTS</p> 
<p>HOME EXTERIOR</p> 		

All use must be consistent with the USE RESTRICTIONS in the DIRECTIONS FOR USE section of this label



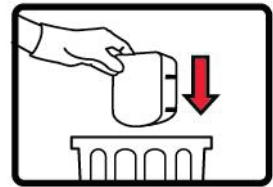
Select Treatment Areas  
(Indoors and Outdoors)



Place



Monitor



Dispose



Note to PM- Cat Logo will be positioned on market label in close proximity to the product name Brand (TOMCAT)

Options below.



Version A - Over Black



Version A - Over White



Version B - Over Black



Version B - Over White