



**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 140-Purple

EPA Registration Number: 90780-14

Application Date: March 14, 2022

Decision Number: 582573

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 Refillable 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

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EPA Reg. No. 90780-14
Decision No. 582573

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.

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

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

OUTER PACKAGE - COMPLETE LABEL

TC RAT KILLER 140 -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 [s] 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

EPA Reg. No. 90780-14
EPA Est. No. 12455-WI-1^k, 12455-WI-2^p, 12455-WI-3^w
[Superscript is first letter of lot number]
[phone icon] **Questions**,[or] Comments[?] [or Medical Information?] [computer icon]

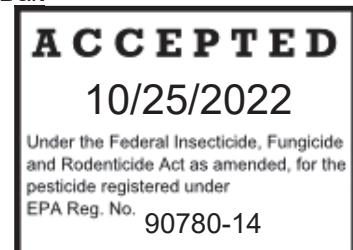


¿Preguntas, Comentarios o Información Médica?
“[www.tomcat.com] [tomcat.com]”

[Patent pending]
[1-877-332-0755]
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Alternate Brand Names:
Tomcat Rat & Mouse Killer Refillable Bait Station
Tomcat Rat & Mouse Refillable Bait Station
Tomcat Advanced Brand Rat & Mouse Bait with Refillable Station

NET WT:
4.23 oz. to 15.87 oz.
4 x 30 g Block Bait 15 x 30 g Block Bait
& 1 (or 2) Refillable Bait Station(s)



Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center, doctor, or 1-877-465-5161 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:	<ul style="list-style-type: none"> • Wash with plenty of soap and water.
HAVE LABEL WITH YOU WHEN OBTAINING TREATMENT ADVICE	
TREATMENT FOR PET POISONING	
If an animal eats this bait, call a veterinarian at once.	
NOTE TO PHYSICIAN OR VETERINARIAN	
<p>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.</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Bait contents harmful if swallowed. Keep away from children, domestic animals, and pets. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, or using tobacco. Any person who handles bait, refills a station, or retrieves carcasses or unused bait must wear gloves.

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 a home or building.

For control only of Norway rats, roof rats, and house mice. This bait station can only be refilled with the block bait sold with this station. TC Rat Killer 140-Purple [This product] 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 or stored block bait in any area where there is a possibility of contaminating food or surfaces that come into direct contact with food. Store bait block refills out of reach of children and pets.

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

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

[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:

While wearing gloves, place 1 or 2 blocks of bait in the bait station. Replace each block as necessary. See additional GRAPHICS AND TEXT. Place the bait station horizontally or vertically 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. While wearing gloves, replace bait in bait station if bait has been consumed or contaminated and rats and/or house mice still are using the bait station.



Note to PM: alternate language: “While still holding tab, squeeze prongs of bait cartridge [with your right hand] and pull it away from station.”

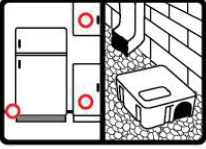
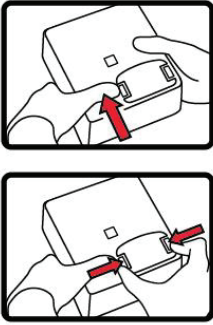


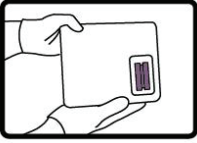
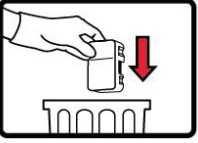
Follow-up: Wearing gloves, collect and properly dispose of any leftover bait or carcasses. Carcasses should be placed in an outdoor garbage can. To discourage re-infestation, eliminate food, water, and harborage as much as possible. If re-infestation does occur, repeat treatment.

[Option 2]

APPLICATION DIRECTIONS

90780-14 EPA Agency letters 3/14/22 & 4/27/22 .TC Rat Killer 140-purple-clean version. to EPA 05/23/22 Page 3 of 16

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

<p>1. Selection of Treatment Area [Indoors & Outdoors]</p> 	<p>2. Remove Bait Cartridge</p> 	<p>3. Load Bait</p> 	<p>4. Placing Bait Stations</p> 	<p>5. Monitor</p> 	<p>6. Follow Up</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>Flip station over to remove the cartridge from the bottom. With your left hand, push tab up. While still holding tab, squeeze prongs of bait cartridge [with your right hand] and pull it away from station.</p>	<p>While wearing gloves, place one or two blocks of bait on the metal prongs in the bait cartridge. Push the loaded cartridge into the bait station until the cartridge clicks into place.</p>	<p>Place bait station at point of highest activity along a wall or in corner where signs of rats and/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 an uninterrupted supply of fresh bait for at least 10 days or until there no longer are fresh signs of rat and/or house mouse activity in infested areas. To monitor for refill, view bait via see-through lid. While wearing gloves, replace the block of bait if it has been consumed or contaminated and rats and/or house mice are still using the bait station.</p>	<p>Wearing gloves, collect and properly dispose of any leftover bait and/or carcasses. Carcasses should be placed in an outdoor garbage can. 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.

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 140-PURPLE

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

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*:	<u>99.99%</u>
		100.00%

*Contains Denatonium Benzoate

EPA REG. NO. 90780-14

EPA Est. No. 12455-WI-1^k, 12455-WI-2^p, 12455-WI-3^w
[superscript is first letter of lot number]

Net Wt.: 1 x 30 g (1.06 oz) to 2 x 30 g (2.12 oz) block bait

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

This bait station can only be refilled with block bait sold with this station.

CAUTION: See outer packaging for DIRECTIONS FOR USE, FIRST AID and additional PRECAUTIONARY STATEMENTS.

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

model no. RR1

Lot/Batch #

INNER PACKAGE - ABBREVIATED LABEL

**TC RAT KILLER 140-PURPLE
[KILLS RATS AND HOUSE MICE]**

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

OPTIONAL MARKETING STATEMENTS:

Efficacy claims:

1. Kills Rats and House mice
2. Rat and House Mouse Killer
3. Kills House Mice [Too!]
4. Kills Rats & House Mice
5. Rats & house mice cease feeding after consuming toxic dose
6. Norway and Roof Rat Killer
7. House mouse killer
8. Rats [Norway rats], [roof 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.
9. Each block kills up to 3 rats* *based on no-choice laboratory testing
10. Each block can kill up to 3 rats* *based on no-choice laboratory testing
11. [Includes] Enough bait blocks to kill up to 9 [18] [27] [36] [45] rats* * based on no-choice laboratory testing
12. This package contains enough bait blocks to kill up to 9 [18] [27] [36] [45] rats* *based on no-choice laboratory testing
13. Rats [and[or] house mice] may enter, feed on the bait, and then leave the bait station
14. Kills up to 3 rats per bait block* *based on no choice laboratory testing

Bait Station Claims:

15. Refill Pack = Lower Cost Per Placement
16. Value Pack -****Note to PM- Value pack would not exceed the 1 lb limit for any package sold at a discounted price*
17. Refill pack is more cost efficient than disposable rat station
18. Includes 15 bait refills
19. Station design is rat tested
20. Refillable Bait Station
21. Station is Child & Dog Resistant
22. 1 [2] [3][4] Refillable Bait Station(s)
23. Can Be Used Indoors or Out
24. [4] [5] [6] [7] [8] [9] [10] [11] [12][13] [14] [15] – 30 Gram (Bait) Refills
25. [4] [5] [6] [7] [8] [9] [10] [11] [12][13] [14] [15] block baits and 1 [2] [3][4] refillable station[s]
26. 15 block baits and 1 refillable station
27. [4] [5] [6] [7] [8] [9] [10] [11] [12][13] [14] [15] – (Bait) Refills
28. Made In USA
29. Can Be Used Horizontally or Vertically
30. Use for both house mice and rat problems [issues] [infestations]
31. Each refill can kill multiple rats and even more house mice
32. Each refill can kill multiple house mice
33. Station helps keep bait fresh
34. Station keeps bait away from children, pets & non-target animals
35. Kid and Dog Resistant Station
36. See-thru window
37. See-thru window for easy bait monitoring
38. Bait station
39. Rat and house mouse bait station
40. Bait station with bromethalin
41. Child and dog resistant [bait] station
42. Child, dog, and weather resistant [bait] station
43. Weather resistant [bait] station
44. Use indoors and out
45. For use indoors and out
46. Indoor and outdoor
47. Durable [bait] station design is child and dog resistant

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

48. Kid and dog tested [bait] station
49. Kid and dog tamper-resistant [bait] station
50. Not a trap
51. This [bait station] is not a trap
52. [4] [5] [6] [7] [8] [9] [10] [11] [12][13] [14] [15] (30g) blocks
53. Bait station made from 95% recycled resin/content.
54. Use in kitchens [behind appliances]
55. Use inside kitchen cabinets
56. Use behind appliances & [and] inside cabinets
57. Use in kitchens, behind appliances and [&] inside cabinets
58. Easy placement behind appliances and in cabinets for kitchen house mice [and rats]
59. Easy placement behind appliances for kitchen house mice [and rats]
60. Easy placement in cabinets for kitchen house mice [and rats]
61. Can be placed behind kitchen appliances and [or] inside kitchen cabinets
62. Can be used behind kitchen appliances and [or] inside cabinets
63. Use in kitchens, behind kitchen appliances, and [&] inside kitchen cabinets

Other/Guarantees

64. Kills rats [rats and/or house mice] [,] guaranteed [!]"
65. Results Guaranteed+
66. Made in USA
67. Guaranteed to kill house mice and rats, or your money back.
68. Guaranteed to kill+
+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

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

Other Claims

69. Utilize traps and bait stations together to control house mice rats ++ ++ traps sold separately
70. Use as part of an integrated pest management system
71. Indoor Placement: Kill house mice [and/or rats] in the home/house

Palatability Claims

72. Formulated for increased attractiveness to [for] house mice
73. Formulated for increased palatability to [for] house mice
74. Formulated for enhanced attractiveness to [for] house mice
75. Formulated for improved attractiveness to [for] house mice
76. Palatable bait formulation for house mice
77. Formulated for increased attractiveness and palatable bait formulation for house mice
78. Formulated for enhanced attractiveness and palatable bait formulation for house mice
79. Formulated for improved attractiveness and palatable bait formulation for house mice
80. Enhanced attractiveness to [for] house mice vs [versus] Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Refillable Station [EPA Reg. No. 90780-11]
81. Improved [bait] formulation to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Refillable Station [EPA Reg. No. 90780-11]
82. Enhanced [bait] formulation to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Refillable Station [EPA Reg. No. 90780-11]
83. Advanced [bait] formulation to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Refillable Station [EPA Reg. No. 90780-11]
84. More palatable [bait formulation] to [for] house mice [vs] versus Our Tomcat Rat & Mouse Killer Child & Dog Resistant, Refillable Station [EPA Reg. No. 90780-11]

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]



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.

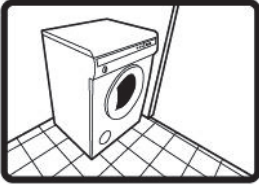
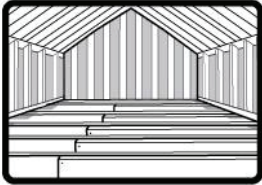

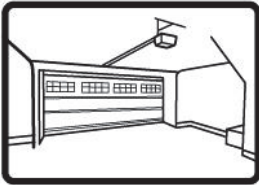
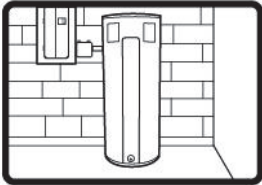
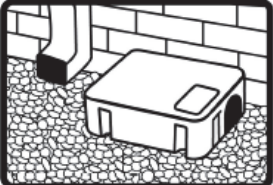
CAN BE USED HORIZONTALLY OR VERTICALLY

 HORIZONTAL	 VERTICAL
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SEE-THRU WINDOW FOR EASY BAIT MONITORING

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]



<p>CAN BE USED IN A VARIETY OF LOCATIONS</p>	<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

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]



NOTE TO PM: ARROW OPTION BELOW MAY BE USED INSTEAD OF THE RED ARROWS FOR IMAGES ABOVE. ARROW COLORS AND SIZE/SHAPE MAY VARY ON FINAL PRINTED LABELING

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

**Load 1 or 2 Blocks
Into Refillable Station**

Bait must always be used in this bait station

**Load 1 or 2 Blocks
Into Refillable Station**

Bait must always be used in this bait station



KID & DOG
RESISTANT STATION

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

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

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]



Version A - Over White

Note to PM: *Bold Italized text is information for the reader and not part of the label.* [Bracketed information is optional]

