

PESTICIDE STANDARD WRITTEN NOTIFICATION FOR SCHOOLS, DAY CARE PROGRAMS, AND SCHOOL-AGE CHILDCARE PROGRAMS

- The school, day care center, and/or school-age childcare program is responsible for sending this standard written notification form to employees, pupils, parents etc. to insure that they receive this information at least 2 working days prior to any pesticide use.
- It is recommended that the Pest Management Professional use this ready-to-copy standard written notification form for the purpose of providing pesticide use information to the school, day care center, and/or school-age childcare program. The Pest Management Professional should save this form for copying.

School: Conservatory Labs Charter School 131-133 Hancock St Dorchester, MA
Name of School , Day care center, and/or School age childcare program

Pest Management Company: Waltham Services 317 Libbey Ind. Pkwy Weymouth, MA
(Please Print) Name Address

Pest Management Professional: Joe McGovern 34107
(Please Print) License number

A. List the Approximate Dates on which the pesticide use shall commence and conclude

Beginning Date 01-13-2017 **Ending Date** 01-12-2018

B. Record the specific location of the anticipated pesticide use

Rodenticide Bait secured in tamper-resistant bait stations on the exterior of the property.

C. Pesticide Information (Pest Management Professional should be specific as is possible when listing product(s) to be used)

Pesticide Product Name	Pesticide Type	EPA Registration #	Description/Purpose of treatment and/or application
1. Contrac w/ Lumitrack	Bait	12455-133	Exterior rodent control
2.			
3.			
4.			
5.			

This standard written notification must be accompanied by the following 2 documents. These materials are available from the MDAR web page www.mass.gov/agr. Follow the links to the Children's Protection page.

- Chemical Specific Fact Sheet(s)
- Consumer Information Bulletin for school, day care center, and/or school-age childcare program.

THE COMMONWEALTH OF MASSACHUSETTS

EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS



Department of Agricultural Resources

251 Causeway Street, Suite 500, Boston, MA 02114

617-626-1700 fax: 617-626-1850 www.mass.gov/agr



THE ACT PROTECTING CHILDREN AND FAMILIES FROM HARMFUL PESTICIDES OF 2000

Massachusetts Pesticide Enforcement Consumer Information Bulletin FOR SCHOOLS, DAYCARE CENTERS AND SCHOOL AGE CHILD CARE PROGRAMS

The Massachusetts Pesticide Control Act requires parents, staff, and children to receive this Consumer Information bulletin whenever pesticide applications are being made on the property of your school, daycare center or school age child care program. This bulletin is being provided to you along with a Standard Written Notification form and a Pesticide Specific Factsheet.

Why am I receiving this information and what should I do when I receive it?

The purpose of the Standard Written Notification is to provide you with information about pesticide applications which are taking place on the property of your school, day care center or school age child care program. The bulletin provides information about precautions you can take to minimize exposure to any pesticides. The Pesticide Specific Factsheets provide information about the properties of the pesticides being used.

Who applies pesticides in my school, daycare center or school age child care program?

Commercial pest management professionals, facilities managers, grounds personnel or custodians. Regardless of the approach used, the person who applies the pesticides must have a current and valid Pesticide Bureau Applicator license. Check the standard written notification form for the applicator's license number.

How do I know when pesticides are being applied?

Employees, supervised children and their guardians must receive standard written notification at least two working days prior to the application of pesticides outdoors on the property. The standard written notification form, which accompanies this bulletin, includes:

- approximate dates when the application shall commence and conclude;
- specific location of the application;
- product name, type and EPA Registration number of the pesticide;
- a Pesticide Specific Fact Sheet;
- a description of the purpose of the application and
- this Consumer Information Bulletin

The notification must also be posted in a common area of the facility at least two working days before the outdoor application is to commence and at least 72 hours after the application. Treated areas will be posted with clear and conspicuous warning signs along the perimeter. This information will be supplied to the school by the licensed pesticide applicator.

Are applications of pesticides safe?

All pesticides must be treated with caution. They are intended to be specifically poisonous to target pest insects, weeds, mold, fungus etc. - and may also be harmful to other living things including humans. Some degree of risk is always posed by their use. Because of this inherent risk, a number of regulatory and non-regulatory mechanisms have evolved to deal with those risks. Included among these mechanisms are pesticide regulations such as those enforced by Massachusetts Pesticide Enforcement; licensing and training of pesticide applicators; improved pesticide application methods; and the use of Integrated Pest Management (IPM).

What precautions can I take to minimize my exposure to pesticide applications?

There are several precautions that can be taken to reduce potential exposure to pesticides. These precautions will vary depending on where and how the pesticides are applied. Chemicals may be ingested, inhaled and absorbed through the skin. Know where the pesticide will be applied and how you might come into contact with it. Use common sense. The licensed pesticide applicator is required to post yellow signs to indicate a pesticide application on school grounds. These are some suggested general precautions. Ask the licensed pesticide applicator for other suggestions or directions specific to the work being done.

For outdoor applications:

- be familiar with the small yellow signs which applicators are required to post when a pesticide is applied outdoors to turf. Stay off the field until the flags are removed.
- if you are sensitive to chemicals, avoid the area of pesticide application for 72 hours.
- ensure that pets are kept away from the area of pesticide application

For indoor applications:

- cover or refrigerate edible products.
- remove or cover toys, clothes, and bedding from areas to be treated.
- remove pets including their food and water bowls and toys from the area to be treated.
- ventilate as much as possible during and, following an indoor pesticide application, open the windows.
- do not walk on treated areas and carpets until completely dry. Ask about drying times.

What types of pesticides will be applied?

Pesticide applicators may apply pesticides in several forms for control of insects and weeds. Dusts, aerosol sprays, sprays, baits, and fogs are all common forms in which pesticides exist and are used. For control of termites, the soil around the building may be impregnated with a pesticide. To control weeds, pesticides may be used as granules or sprays. Mechanical traps may also be used to control rodents.

In Massachusetts schools daycare centers and school age child care programs have to develop special pest management plans called Integrated Pest Management (IPM) plans. IPM is an approach to pest management which relies on a combination of common sense practices, including pesticides, for preventing and controlling pests. All plans are required to be submitted to the Department of Agricultural Resources. Check the MDAR website to see if your school has submitted its plan. <http://massnrc.org/ipm/index.html>

What if I have a question or problem?

Questions about what pesticides will be applied and why, and specific information about the application should be referred to the licensed pesticide applicator doing the work.

The Massachusetts Department of Agricultural Resources, Pesticide Enforcement is responsible for enforcing the pesticide regulations and laws. Contact Pesticide Enforcement at 617-626-1781. Additional information can be found at the Pesticide Programs website: <http://www.mass.gov/agr/pesticides/>

Updated August 2011



DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND
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Department of Agricultural Resources
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IAN A. BOWLES
Secretary

DOUGLAS W. PETERSEN
Commissioner

NEW POLICY ON CHILDREN'S AND FAMILIES PROTECTION ACT STANDARD WRITTEN NOTIFICATION REQUIREMENTS

DATE: January 21, 2009

TO: Schools, Day Cares, School Age Child Care Programs
Massachusetts Early Education and Care
Pesticide Applicator Associations
Licensed Dealers

FROM: Massachusetts Department of Agricultural Resources, Division of Crop Protection and Pest Management, Pesticide Program

BACKGROUND:

The Children and Families Protection Act currently requires that schools send standard written notification home to parents and employees at least two working days before an outdoor pesticide application is to take place. A full notification includes the following three parts:

1. Consumer Information Bulletin;
2. Department Notification Form ; and
3. Chemical Fact Sheet.

In the past, it was the Department's interpretation that schools must send all parents hard copies of the above information, in order to comply with the standard written notification requirements. This notification method is costly to schools and did not take advantage of current electronic communication technology. With these issues in mind, the Department now has the following policy permitting schools to provide Standard Written Notification to parents via electronic means as an option to providing such notices in hard-copy format.

POLICY

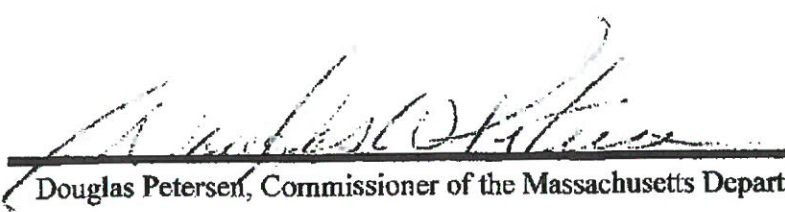
It is the Department's policy to permit schools the following options for providing standard written notification to parents via electronic means. The following are examples of electronic standard written notification that the Department would find acceptable under this policy:

Option A: Schools may elect to send a letter home at the beginning of the school year that would provide an opportunity for parents to choose whether they wish to receive notification via hard copy or email format. Should parents choose to receive the notification via email, language in the letter shall make clear that it is the parents responsibility to routinely check their email and notify the school when their email address changes. The letter shall be issued every year and be maintained by the school for five-years, along with the school IPM plan. The letter shall also be provided to parents of any new or transfer students after registration at the school. See Appendix A for a model format of an acceptable letter format.

Email notification of pesticide applications shall include the three parts as outlined above. The schools must ensure that the notification is sent out in a manner so that it can be viewed at least two-working days prior to the pesticide application.

Option B: Schools may elect to use reverse 911 (community notification systems), to notify parents of an outdoor pesticide application. The reverse 911 call shall be made at least two working days prior to the application and direct parents to the school's website whereby; interested parties may view copies of the standard written notification. The website shall post the three parts as outlined above. Should parents not have the capability to view the notification on the website, the school shall make a hard copy available.

Option C: Schools may elect to call parents individually to notify parents that an outside pesticide application is going to take place. The call shall be made at least two working days prior to the application and direct parents to the school's website; whereby, interested parties may view copies of the standard written notification. The website shall post the three parts as outlined above. Should parents not have the capability to view the notification on the website, the school shall make a hard copy available.



Douglas Petersen, Commissioner of the Massachusetts Department of Agricultural Resources

Appendix A

Dear Parents:

The Children and Families Protection Act of 2000 requires all schools (public, private, day care and school age child care programs) to develop and maintain an Integrated Pest Management Plan concerning any pest problems that may exist inside or outside of our school. The law also requires that you be notified at least two working days prior to any outdoor pesticide applications.

Should our school have to make any pesticide applications to the outside of the building we are asking for parents to "sign up" should they want to be notified of these applications via email. Please note that by choosing the option of being notified via email, you agree to routinely check your email as the notification is required to be sent out at two working days prior to the scheduled application. Please fill out the bottom of this form and return it by *(write in date)*. Should you choose to not be notified via email then the notification will be sent home with your child.

_____ **NO**, I would not like to be notified of outdoor pesticide applications via email, I would prefer to have the notification sent home with my child.

Name of Student(s) Registered or Enrolled

Signature and Date of Parent or Legal Guardian

_____ **YES**, I would like to be notified of outdoor pesticide applications via email. Please send such notifications to the below provided email address(es).

Email Address(es) of Parent(s) or Legal Guardian(s)

Name of Student(s) Registered or Enrolled

Signature and Date of Parent or Legal Guardian



R.E.D. FACTS

Rodenticide Cluster

Pesticide Reregistration

All pesticides sold or distributed in the United States must be registered by EPA, based on scientific studies showing that they can be used without posing unreasonable risks to people or the environment. Because of advances in scientific knowledge, the law requires that pesticides which were first registered before November 1, 1984, be reregistered to ensure that they meet today's more stringent standards.

In evaluating pesticides for reregistration, EPA obtains and reviews a complete set of studies from pesticide producers, describing the human health and environmental effects of each pesticide. The Agency develops any mitigation measures or regulatory controls needed to effectively reduce each pesticide's risks. EPA then reregisters pesticides that can be used without posing unreasonable risks to human health or the environment.

When a pesticide is eligible for reregistration, EPA explains the basis for its decision in a Reregistration Eligibility Decision (RED) document. This fact sheet summarizes the information in the RED document for reregistration case 2755, brodifacoum; case 2760, bromadiolone; case 2765, bromethalin; case 2100, chlorophacinone; case 2205, diphacinone and its sodium salt, and, case 2810, pival and its sodium salt.

Use Profile

These chemicals are for the control of mammal pests, particularly commensal rats and mice but also a variety of field rodents [note: commensal rodents are Norway rat, roof rat, and house mouse.] Products can be used in and around buildings, alleys, transport vehicles (trains, ships, aircraft) and related port terminals, or in sewers. A few diphacinone labels allow applications in wet or damp sites such as dumps, irrigation ditches, along fences, and in gullies. Other products have limited uses. Bromadiolone products can be applied only indoors in non-urban areas. Diphacinone sodium salt liquid (i.e., drinking) bait can be applied only indoors, and diphacinone and chlorophacinone tracking powders can only be used indoors and in rodent burrows along the outside walls of buildings.

Most rat and mouse products are formulated as pelletized baits. Some products are sold in place packs (pellets contained in small plastic or paper bags applied unopened) and others, especially those for use in sewers, as paraffinized bait blocks. Current labels for rat and mouse baits used outdoors require that baits be applied in protective bait stations or placed in areas inaccessible to nontarget wildlife (e.g., in burrows).

Both chlorophacinone and diphacinone have section 3 and Special Local Needs (SLNs) registrations for field uses. Each has one product for hand-applied, underground baiting of pocket gophers. Chlorophacinone has one product for underground baiting of moles. Diphacinone has one product for field control of ground squirrels. Twenty states have one or more SLNs for vole control, predominantly in dormant fruit orchards, and nine states have SLNs for control of ground squirrels. Other SLNs target various rat species (CA, FL), deer mice (CA), pocket gophers (CA), moles (OR, WA), chipmunks (CA), muskrats (CA), woodrats (CA), jackrabbits (CA, OR), and mongoose (HI).

Most products are 0.005% active ingredient or 0.01% active ingredient food pellets; others include treated whole grains, paraffinized food blocks, a chlorophacinone orchard spray for voles, meat bait for mongoose, and treated artichoke bracts for voles in California artichoke fields. Many of the orchard applications for voles include aerial broadcasting of food bait.

Regulatory History

The Agency's predecessor, the U.S. Department of Agriculture (USDA), first regulated vertebrate control agents after Congress passed FIFRA in 1947. Since then, additional rodenticides have been registered including diphacinone which was registered in 1960 followed by the registration of its sodium salt in 1962. Chlorophacinone and brodifacoum were registered in 1971 and 1979, respectively, followed by bromadiolone in 1980 and bromethalin in 1984. This RED covers 243 of the currently registered 406 products, including Section 3 and 24(c) used to control vertebrate pests by baits and tracking powders. The decisions made in this RED will affect many of the remaining 182 vertebrate controlled products, which were the subject of past REDs as well as those subject to future reregistration.

Human Health Assessment

Toxicity

In studies using laboratory animals, brodifacoum, bromadiolone, bromethalin, chlorophacinone, and diphacinone and its sodium salt generally

have been shown to be highly acutely toxic. All chemicals, with the exception of bromethalin, are in categories I for oral, inhalation and dermal exposure. Bromethalin is category II for dermal exposure.

Dietary Exposure

The Agency considers the uses of brodifacoum, bromadiolone, bromethalin, chlorophacinone, and diphacinone and its sodium salt to be nonfood. Based on current use patterns and exposure profiles, residues in and on food and/or feed are not expected to occur. Therefore, a dietary risk assessment is not required.

Occupational and Residential Exposure

EPA is concerned about the likelihood of risk of human exposure, resulting from continued use of rodenticides in residential settings. The number of human incidents reported has increased greatly in recent years with the advent of a new reporting network. In 1988, more than 10,000 rodenticide incidents were reported in the American Association of Poison Control Center's National Data Collection System. About 90% of these cases involved children under six years of age. Nearly all of such exposure incidents are classed as accidents. The human exposure incidents that are reported may represent less than half of those which actually occur. Well over 80% of reported human rodenticide exposures involve anticoagulant compounds.

The Agency has determined that there is potential exposure to applicators and/or other handlers during typical use patterns associated with these chemicals. Specifically, the Agency is concerned about potential dermal and inhalation exposures to handlers during the loading and application of these chemicals. Based on the use patterns and potential exposures, major handler scenarios were identified such as (1) placing bait packs; (2) loading bait boxes or bait stations with meal bait, grain bait, bait pellets, or other food-based bait from larger containers; (3) breaking paraffinized blocks into pieces and placing the pieces in bait stations; (4) securing large paraffin blocks in bait stations used in sewers; (5) applying bait by hand; and (6) applying bait, e.g. pellets in broadcast treatments using ground and (6) spray.

Human Risk Assessment

Rodenticides are acutely toxic to humans. Margins of Exposure (MOEs), when bait is ingested, are less than one. Generally, the Agency

considers a MOE of 100 or above to be protective of the public's health. The Agency, for example, has calculated the dose a 10 kg child receives from a 43 gram packet (standard commercial package). The Agency's calculation resulted in a MOE of 0.5.. Because of improved data collection, it appears that the high number of human unintentional or accidental exposures to rodenticides remain constant each year, or may be increasing. From the number of exposures to children, it is clear that children under six years-old are disproportionately more at risk to the continued use of these products in and around the home. EPA is therefore concerned about the risk from accidental exposures to these chemicals from residential users, particularly children.

Environmental Assessment

Environmental Fate

While generally the rodenticides are very similar in their environmental fate characteristics, there are a few exceptions. The rodenticides are generally stable to hydrolysis, except for diphacinone at pH 5 (which has a half-life of 44 days), moderately persistent to persistent to aerobic soil degradation (half-lives of 26 to 178 days) and, except for bromethalin can generally be considered to be immobile in the soil (K_{ds} = 5.4 to 1000, and found in the upper soil layer of column leaching studies).

Generally the potential for these chemicals to reach ground water is low. They probably reach surface waters through adsorption to eroding soil, as opposed to dissolution in runoff water. Because of their generally high adsorption coefficients and/or demonstrated lack of movement in soil leaching columns they would have a good probability of partitioning into the suspended and bottom sediments instead of the water column after reaching surface waters.

Based on the available data, little if any contamination of surface and ground waters is expected for brodifacoum, bromadiolone, chlorophacinone and diphacinone. These chemicals, although persistent, tend to be relatively immobile in soil and fairly insoluble in water. Most are applied as a pelleted bait in and around buildings and mostly in protective bait stations when used outdoors. Because of the lack of leaching data, the environmental fate of bromethalin is uncertain at this time. Leaching data is being requested for bromethalin in the RED.

Ecological Effects

Primary toxicity to mammals is very high for all five of these products. Primary toxicity to birds is mostly high to very high for the single-feeding compounds (brodifacoum, bromadiolone, bromethalin), but

mostly moderate for the multiple-feeding compounds (diphacinone, chlorophacinone). Toxicity to aquatic organisms ranges from moderate to very high.

Available laboratory and/or field data indicate that rodents poisoned with brodifacoum and bromadiolone baits can kill avian and mammalian secondary consumers. Sufficient data also exists to indicate that 0.01% a.i. diphacinone bait is secondarily hazardous to birds and mammals and that 0.01% a.i. chlorophacinone bait is hazardous to mammalian predators.

Ecological Effects Risk Assessment

The Agency believes that there is a high risk of secondary poisoning, especially to mammals, from the use of these rodenticides outdoors (i.e., "around" buildings) in rural and suburban areas. The available data indicate that brodifacoum, bromadiolone, and 0.01% a.i. chlorophacinone and diphacinone baits may pose a secondary hazard to avian and/or mammalian predators that feed on poisoned rodents. Brodifacoum and bromadiolone likely pose the greatest secondary risks, because they are more acutely toxic, especially to birds, more persistent in animal tissues, and can be lethal in a single feeding. In contrast, chlorophacinone and diphacinone tend to be less toxic to birds, less persistent in the tissues of primary consumers, and must be eaten over a period of several days to cause mortality. Therefore, a predator feeding only once on a poisoned carcass may not die if the rodent was poisoned with diphacinone or chlorophacinone, but is more likely to die if the rodent was poisoned with brodifacoum or bromadiolone. Data is being requested in the RED for bromethalin in order to determine secondary risks.

The Agency recently became aware of incident data which suggests that there may be a potential incident problem specifically involving the active ingredient brodifacoum. At this time the Agency is reviewing the data; no final conclusions have been reached. Additionally, through the "Notice of Availability" for this document, the Agency requests state incident data for all rodenticides to better understand the extent of this potential problem. After review, the Agency may impose additional restrictions on the use of brodifacoum and/or other active ingredients.

Risk Mitigation

To address the risks posed by the rodenticides bromadiolone, bromethalin, brodifacoum, chlorophacinone, diphacinone and its sodium salt, EPA has developed a two-phased approach to minimize exposure particularly to infants and children.

During Phase I the Agency will require the products covered in the rodenticide cluster to incorporate an indicator dye (to help identify whether a child or pet has actually consumed the pesticide) and a bittering agent into the formulations. The Agency is aware that all mitigation measures required during Phase I may not be feasible within the 8-month time frame usually accorded by the RED process to submit labeling changes. While registrants will still be required to submit revised labeling within the 8-month time frame, the Agency recognizes that the formulation changes required by the add-on of the indicator dye and bittering agent may take longer. The timing for the incorporation of the dye and bittering agent in rodenticide products will be an outcome of the initial stakeholder meeting. In Phase II, EPA will form a stakeholder group that will include representatives from industry, states, various poison control centers, rodent control experts, the medical community and other interested parties to develop additional means of significantly reducing exposures to children and pets.

In addition to the mitigation measures discussed above, EPA is requiring a number of label revisions to rodenticides used in and around the home as well as requiring registrants, under the authority of FIFRA, section 3(c)(2)(B), to submit data from the American Association of Poison Control Center. The data will be for the years 1999 through 2009. Restricted Use classifications will also continue to be maintained.

Additional Data Required

EPA is requiring the following additional generic studies to confirm its regulatory assessments and conclusions:

Brodifacoum

- 21-Day Dermal - rabbit/rat [82-2]
- Estimation of Dermal Exposure at Outdoor Sites [231]
- Estimation of Inhalation Exposure at Outdoor Sites [232]
- Estimation of Dermal Exposure at Indoor Sites [233]
- Estimation of Inhalation Exposure at Indoor Sites [234]

Bromadiolone

- Leaching/Adsorption/Desorption [163-1]
- Estimation of Dermal Exposure at Outdoor Sites [231]
- Estimation of Inhalation Exposure at Outdoor Sites [232]
- Estimation of Dermal Exposure at Indoor Sites [233]
- Estimation of Inhalation Exposure at Indoor Sites [234]

Bromethalin

- General Metabolism [85-1]
- Leaching/Adsorption/Desorption [163-1]
- Estimation of Dermal Exposure at Outdoor Sites [231]
- Estimation of Inhalation Exposure at Outdoor Sites [232]
- Estimation of Dermal Exposure at Indoor Sites [233]
- Estimation of Dermal Exposure at Outdoor Sites [234]
- Secondary Poisoning, Mammal [70-A-SS]*
- Protocol
- Secondary Poisoning, Bird [70-B-SS]*
- Protocol
- Whole Body Residue, Target Species [70-C-S]*
- Protocol

*Studies are not required for “indoors and along the outside walls of buildings”, but are required for any other uses.

Chlorophacinone

- Avian Reproduction, Quail [71-4(a)]*
- Avian Reproduction Duck [71-4(b)]*
- Estimation of Dermal Exposure at Outdoor Sites [231]
- Estimation of Inhalation Exposure at Outdoor Sites [232]
- Estimation of Dermal Exposure at Indoor Sites [233]
- Estimation of Dermal Exposure at Outdoor Sites [234]
- Secondary Poisoning, Mammal [70-A-SS]**
- Protocol
- Secondary Poisoning, Bird [70-B-SS]**
- Protocol
- Whole Body Residue, Target Species [70-C-S]**
- Protocol

*Required to support Product CAS 90023.

**Studies are not required for “indoors and along the outside walls of buildings”, but are required for any other uses.

Diphacinone, and Salt

- General Metabolism[85-1]

- Hydrolysis [161-1]
- Leaching/Adsorption/Desorption [163-1]
- Estimation of Dermal Exposure at Outdoor Sites [231]
- Estimation of Inhalation Exposure at Outdoor Sites [232]
- Estimation of Dermal Exposure at Indoor Sites [233]
- Estimation of Dermal Exposure at Outdoor Sites [234]
- Secondary Poisoning, Mammal [70-A-SS]*
- Protocol
- Secondary Poisoning, Bird [70-B-SS]*
- Protocol
- Whole Body Residue, Target Species [70-C-S]*
- Protocol

*Studies are not required for “indoors and along the outside walls of buildings”, but are required for any other uses.

The Agency also is requiring product-specific data including product chemistry and acute toxicity studies, revised Confidential Statements of Formula (CSFs), and revised labeling for reregistration.

Product Labeling Changes Required

All brodifacoum, bromadiolone, bromethalin, chlorophacinone and diphacinone and its sodium salt end-use products must comply with EPA's current pesticide product labeling requirements and with the following. For a comprehensive list of labeling requirements, please see the Rodenticide Cluster RED document.

Labeling Requirements:

1. Incorporate the word “POISON” (in Spanish and English), and skull and cross bones icon on the labels.
2. The section on labels for pets must include a hazard to pet statement, first aid treatment for pets, and a note to veterinarians.
3. To clarify that bait can be applied only as specified on the label the following must be added: “Do not apply this product by any method not specified on this label”.
4. Specific information regarding use sites and use directions should be included on SLN labels to help avoid inappropriate use of these products.

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- 5 Dust masks/respirators and water-proof gloves are required for commercial handlers (Mixer/loader/applicator) when handling rodenticide chemicals not already in place packs.
 - 6 All products intended primarily for occupational use must contain the following statement: "Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment".
 7. Products intended primarily for consumer use (OTC) must contain the following stat: "Do not apply this product in a way that will contact any person or pet. Keep people and pets out of the area during application.
 8. All products must contain an environmental hazard statement stating: "Do not apply 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".
 9. All tracking powders must limit treatment areas to concealed, inaccessible places such as spaces between floors and walls. Powder may not be applied along walls, in corners or in open floor areas of rooms in which food or feed is handled or stored.
 - 10 All rodenticide products labeled for field use, except those limited to manual underground baiting for pocket gophers and moles, will be restricted use.
 11. Where applications for the control of mice and rats in non-urban and rural settings are not limited indoors and against the outside walls of buildings, labels shall state to place baits:
"indoors and along the outside walls of buildings."
 12. The second sentence of the "Environmental Hazards" precautionary labeling on all food bait products should read as follows: "Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait."
 13. For chlorophacinone orchard spray products, the statement should be modified to read:
"Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have been poisoned by this product.

Regulatory Conclusion

With the exception of pival and its sodium salt, the Agency has concluded that the uses, as prescribed in the RED document, with additional labeling requirements and a number of risk mitigation measures, will not cause unreasonable risks to humans or the environment.

The Agency has determined that all uses of brodifacoum, bromethalin, and bromadiolone are eligible for reregistration.

The Agency has determined that all uses of chlorophacinone and diphacinone and its sodium salt are eligible for reregistration, with the exception of certain field bait uses. The Agency has determined that field-bait uses containing .005% chlorophacinone and diphacinone and its sodium salt are eligible for reregistration.

The Agency has determined that field-bait uses containing .005% chlorophacinone and diphacinone and its sodium salt are ineligible for reregistration. Field tests have adequately demonstrated that products with lower-concentrations of these active ingredients are sufficiently efficacious for target pest species, and that the uses with higher concentrations have the potential to cause unnecessary secondary poisonings to avian and mammalian consumers.

The EPA has determined that all uses of pival and its sodium salts are ineligible for reregistration. Pival and its sodium salt was suspended by the Agency in December 1994 for failure of the registrant, Motomco, Incorporated, to respond to the Agency's Data Call-In Notice (DCI) and submit the required data to support the continued registration. In the future, EPA may seek cancellation of the registration for pival and its sodium salt.

For More Information

EPA is requesting public comments on the Reregistration Eligibility Decision (RED) document for brodifacoum, bromadiolone, bromethalin, chlorophacinone and diphacinone and its sodium salt, during a 60-day time period, as announced in a Notice of Availability published in the Federal Register. To obtain a copy of the RED document or to submit written comments, please contact the Pesticide Docket, Public Response and Program Resources Branch, Field Operations Division (7506C), Office of Pesticide Programs (OPP), US EPA, Washington, DC 20460, telephone 703-305-5805.

Electronic copies of the RED and this fact sheet can be downloaded from the Pesticide Special Review and Reregistration Information System at

703-308-7224. They also are available on the Internet using ftp on
, or using WWW (World Wide Web) on

Printed copies of the RED and fact sheet can be obtained from EPA's National Center for Environmental Publications and Information (EPA/NCEPI), PO Box 42419, Cincinnati, OH 45242-0419, telephone 513-489-8190, fax 513-489-8695.

Following the comment period, the Rodenticide Cluster RED document also will be available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, VA 22161, telephone 703-487-4650.

For more information about EPA's pesticide reregistration program, the brodifacoum, bromadiolone, bromethalin, chlorophacinone, and diphacinone and its sodium salt RED, or reregistration of individual products containing brodifacoum, bromadiolone, bromethalin, chlorophacinone, and diphacinone, please contact the Special Review and Reregistration Division (7508W), OPP, US EPA, Washington, DC 20460, telephone 703-308-8000.

For information about the health effects of pesticides, or for assistance in recognizing and managing pesticide poisoning symptoms, please contact the National Pesticides Telecommunications Network (NPTN). Call toll-free 1-800-858-7378, between 9:30 am and 7:30 pm Eastern Standard Time, Monday through Friday.

