From: Jennifer Gaines
To: Gaines.jennifer@epa.gov
Subject: Fw: Mitigation Labels 7173-258
Date: 06/06/2012 11:25 AM

Jennifer Gaines
Wildlife Biologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)

Tel: 703 305-5967
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----- Forwarded by Jennifer Gaines/DC/USEPA/US on 06/06/2012 11:20 AM -----

From: John Hebert/DC/USEPA/US
To: Rachel Callies <CalliesR@liphatech.com>
Cc: Jennifer Gaines/DC/USEPA/US@EPA, Thomas Schmit <SchmitT@liphatech.com>
Date: 02/27/2009 09:51 AM
Subject: Re: Mitigation Labels 7173-258

Hi Rachel - Sorry that I didn't get back to you earlier. I told Jennifer that I was going to write back but of course it has taken me longer to respond than I had planned. When we did many of the reregistration labels in Sept 08 we really weren't completely organized. I'm not only talking about stamping old labels (submitted to SRRD with the 8 mo. response), but also incorporating the labeling comments that we need to include from both the RED(s) and mitigation. That's why you're seeing more comments than you probably expected. Specifically, I'll try to address your questions/comments you had on the labeling and in your 2/18 email.

1. The pet poisoning and Note to Veterinarian language is being added to all products. It does not matter whether the product is RUP. Tracking powders can be used in residential settings. If a pet is exposed a vet, consumer, poison control center, etc. can consult the label for treatment advice. We're also adding these statements to MUPs b/c exposure may happen during transport/spills.

2. Adding "dogs" to the environmental hazards section is a requirement from the RED. It's appropriate to add dogs in the section because it refers to secondary toxicity. Also, given the number of dog incidents, basically we just think it's a good idea. But I do like your suggestion to include some language about secondary exposure to the Treatment for Pet Poisoning. I'll talk with Jennifer and Dan and we'll come up with something.

3. "Storage" qualified with Pesticide in the Storage/Disposal Statement. I don't really understand why this is an issue. Is there a particular reason why you object?

"Pesticide Storage" is the heading used in the Label Review Manual. We may not have consistently made a comment about this in the past, but we will try to from this point on.

4. For "Tracking powder must....or non-target wildlife": "Non-target" is included here to avoid confusion because wildlife includes rodents. And again, this is in the RED.

5. "Do not apply tracking.....handled or stored": I'm not really sure what to say here except that this language was taken directly from the RED. Jennifer's notes indicate that it is included in the comments for 7173-172.

6. Adding Personal Protective Equipment (including respirator language) and User Safety Requirements. We know that rodenticides are exempt from WPS. PPE is not only for WPS products. This language is required by the RED.

7. The difference in the Note to Veterinarian in the tracking powders: I think the label changes for the paste about checking the prothrombin times every 3 days comes from the RED. Whether you use "elevated" or "prolonged" when describing prothrombin times makes no difference to us.

These comments will be applied across the board as we review your products that are submitted in response to the mitigation/reregistration. Please let Jennifer know how you want to proceed. She can either approve these labels with comments or you can provide clean copies. Let me know if you have any questions.

Regards,

John, 703-308-6249

▼ Rachel Callies ---02/25/2009 10:28:02 AM---Hi Jennifer- I am back in the office today. I was just wondering if you have had any

From: Rachel Callies <CalliesR@liphatech.com>
To: Jennifer Gaines/DC/USEPA/US@EPA
Cc: John Hebert/DC/USEPA/US@EPA, Thomas Schmit <SchmitT@liphatech.com>
Date: 02/25/2009 10:28 AM
Subject: Re: Mitigation Labels 7173-258

Hi Jennifer-

I am back in the office today. I was just wondering if you have had any
time to read through the notes I wrote and when you may be available for a

conference call with John Hebert.

Tom and I are available tomorrow morning and all day Friday.

Thanks!

Rachel

On 2/19/09 2:05 PM, "Gaines.Jennifer@epamail.epa.gov"
<Gaines.Jennifer@epamail.epa.gov> wrote:

> Oh great catch on RUP statements! Yeah that sound great to
send that on
> the next draft. Sorry for the delay in getting back to you,
I've been
> working on a couple of things at once...multi tasking at its
best. If
> you can send it by the end of the day that is great, I leave
at 3:30,
> but I periodically check my e-mails while I'm at home, well
actually I
> have class tonight, but I'll check before class starts.
Thanks for your
> help with this too.
>
> Jennifer
>
> Jennifer Gaines
> Wildlife Biologist
> U.S. Environmental Protection Agency
> Insecticide-Rodenticide Branch
> Registration Division (7505P)
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> Rachel Callies
> <CalliesR@liphat
>
ech.com> To
> Jennifer
Gaines/DC/USEPA/US@EPA
> 02/19/2009
02:26 cc
> PM
>
Subject
> Re: Mitigation Labels
7173-258
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>
> I spoke with Tom just now. I am going to have to go through
everything
> again and see what I can do with these based on our
conversation. Good
> thing I am looking at these labels again, I just noticed that
the
> tracking
> powder labels don't have the RUP statement on them! A big
oversight I
> will