From: Jennifer Gaines
To: Gaines.jennifer@epa.gov
Subject: Fw: Mitigation Labels 7173-258
Date: 06/06/2012 11:25 AM
Attachments: rodenticide language.doc
7173-113 & 172 label change notes
7173-258 label change notes

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

Tel: 703 305-5967
Fax: 703 305-6309

----- Forwarded by Jennifer Gaines/DC/USEPA/US on 06/06/2012 11:21 AM -----

From: John Hebert/DC/USEPA/US
To: Dan Peacock/DC/USEPA/US@EPA
Cc: Jennifer Gaines/DC/USEPA/US@EPA
Date: 03/05/2009 02:49 PM
Subject: Fw: Mitigation Labels 7173-258

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dan - jennifer, LiphaTech and I have been going back and forth on some of the labeling comments that we have discussed for all the rereg. letters. attached at the bottom are Lipha's issues with their suggested text. i told Lipha that i will get back to them by the friday COB.

for -113 and -172 we agreed with basically, we agreed with Lipha completely on their point number one. for their second point, i think they have a point the there is redundancy that we could eliminate. i've taken a stab at rewriting it - see the attached document. and for the third comment - we don't think that we can change much here, except for incorporating the carcass language. Here is a summary of our comments.

rodenticide language.doc

for -258 both jennifer and i think that combining the Notes to Physician and Vet reduces redundancy. they both basically say the same thing. i think the important new addition here was the "Treatment for Pet Poisoning" statement which will stay.

can you please let me know what you think. again, quickly please since i owe them a response tomorrow. thanks...

john

----- Forwarded by John Hebert/DC/USEPA/US on 03/05/2009 01:40 PM -----

From: Rachel Callies <CalliesR@liphatech.com>
To: John Hebert/DC/USEPA/US@EPA
Cc: Jennifer Gaines/DC/USEPA/US@EPA, Thomas Schmit <SchmitT@liphatech.com>
Date: 02/27/2009 10:58 AM
Subject: Re: Mitigation Labels 7173-258

Thanks John for your time on this. I understand your point and appreciate your explanation of the situation.

Unfortunately, I don't think you got the most up to date version of our concerns. Originally, I did say we weren't going to make a number of the required changes but, after working with Jennifer and discussing the issues internally, we had agreed to adding pretty much everything. However, our concern is in incorporating the language consistently.

I also have the same type of changes/additions for other products being required from Dan Peacock but the wording is substantially different. We are specifically looking for your approval on the language attached. We would like to know that the changes we are making can be considered "standard reregistration language," and will be allowed on all labels that we submit. We want to have this language nailed down in preparation for the massive label updates that will be done for the reregistration.

You are well aware that, in the past, we have had problems with different reviews incorporating these types of requirements in vastly different ways. We would like to get your approval on the language and be able to put it on all our reregistration labels with confidence that it will not be rewritten at random.

Jennifer has been very understanding and wonderful to work with on this issue and I have no doubt that we could easily come to some agreement on these labels but, as you can see, our concern is larger than that.

If you could take a quick look at the attached and let me know if there are any problems with incorporating these changes, I would really appreciate it.

I know your time is in high demand and I am grateful for your attention to this!

Kind Regards,
Rachel

On 2/27/09 8:51 AM, "Hebert.John@epamail.epa.gov"
<Hebert.John@epamail.epa.gov> wrote:

>
>
> 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,
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>
> John, 703-308-6249
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> | From: |
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> |Rachel Callies <CalliesR@liphatech.com>
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> | To: |
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> |Jennifer Gaines/DC/USEPA/US@EPA
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