From: Jennifer Gaines
To: Gaines.jennifer@epa.gov
Subject: Fw: Mitigation Labels 7173-258
Date: 05/30/2012 07:44 AM

Jennifer Gaines
Wildlife Biologist
U.S. Environmental Protection Agency
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----- Forwarded by Jennifer Gaines/DC/USEPA/US on 05/30/2012 07:41 AM -----

From: John Hebert/DC/USEPA/US
To: Jennifer Gaines/DC/USEPA/US@EPA
Date: 02/26/2009 03:01 PM
Subject: Fw: 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 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 are being added to all products. (Jennifer - true? or is it just the anticoagulants). It does not matter whether the product is RUP. Tracking powders can be used in residential settings. 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. I'm OK with "Storage" without qualifying it with pesticide. (Jen - compromise here. i think they're just complaining because...and for no other reason. however, i do think that pesticide really is important for the "Disposal" statement obviously. BUT i'm having second thoughts and i might change my mind b/c this is how it's listed in the Label review manual.)

4. For "Tracking powder must....or non-target wildlife": Wildlife includes the

rodents that the product is registered for. And again, this is in the RED.

5.

----- Forwarded by John Hebert/DC/USEPA/US on 02/26/2009 01:51 PM -----

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: 02/20/2009 09:16 PM
Subject: Re: Mitigation Labels 7173-258

Hi Jennifer,

Tom and I would like to have a conference call with you and John before we proceed with these label changes. It is of outmost importance to us that we understand what exactly will be required on reregistration labels and that these requirements are consistent throughout all of our products. As I mentioned before, this goes back to the first package of stamped reregistration labels we received this past fall that were "reregistration compliant." In a very short period of time, even more changes are now required to these same labels in order to be considered compliant. Keeping in mind that we will soon be submitting all of our products with required reregistration language, it is imperative that we come to an agreement about what this language will be.

We have worked very hard in the past few years to keep all of our label language consistent from product to product and even minor variations compound themselves and cause problems.

For instance, the label changes required for the tracking powder products:

TREATMENT FOR PET POISONING
If animal eats bait, call veterinarian or 1-800-xxx-xxxx [optional] at once.
NOTE TO VETERINARIAN Anticoagulant Chlorophacinone: For animals ingesting bait and/or showing poisoning signs (bleeding or **elevated** prothrombin times), give Vitamin K1.

vs The label changes to the paste:

TREATMENT FOR PET POISONING
If animal eats bait, call veterinarian or 1-800-xxx-xxxx [optional] at once.
NOTE TO VETERINARIAN
Anticoagulant difethialone: For animals ingesting bait and/or showing poisoning signs (bleeding or **prolonged** prothrombin times), give Vitamin K1 **[insert dose if know]**. **If needed, check prothrombin times every 3 days until values return to normal.**

We truly believe that consistent labeling is one of the keys to understandable labels and correct usage of the products. It is of the outmost importance that we all understand and agree what the acceptable language is and that we are able to submit future labels that are acceptable to your office as written.

I know John is out of the office the rest of the week, as is Tom. I am out of the office next week Monday and Tuesday. We are available Wednesday, Thursday or Friday for a conference call. Please let me know when you think it would be possible to talk.

In preparation for this, I have attached two documents outlining the language that we would like to discuss.

Thanks again for your cooperation and understanding!

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
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> Jennifer Gaines
> Wildlife Biologist
> U.S. Environmental Protection Agency
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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
> correct on the next draft I send to you.
>
> This is going to take me a little while. I will try to send you