From: Jennifer Gaines
To: Gaines.jennifer@epa.gov
Subject: Fw: Mitigation- Rodenticides Questions
Date: 05/30/2012 01:56 PM

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 05/30/2012 01:53 PM -----

From: Russell Wasem/DC/USEPA/US
To: "John Lublinkhof" <jlublinkhof@belllabs.com>
Cc: John Hebert/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA, Laura Parsons/DC/USEPA/US@EPA, Jude Andreasen/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA
Date: 07/07/2009 11:51 AM
Subject: Re: Mitigation- Rodenticides Questions

Good Afternoon John,

I don't interpret page 30 the same way you have below. The initial intent was that products being amended by the December 12, 2009 deadline, would cease using the old/non-compliant labeling within 6 months of label amendment being approved. Upon internal discussion we realized this would be unfair for registrants complying with the RMD. Therefore, we are allowing amended/reregistered products to be marketed under old, non-compliant labels until June 4, 2011. John H, of RD, has informed me we have been adding revised existing stocks language to every approved rodenticide product to account for this. Products whose labels are not compliant with the RMD, must be released by registrants into the channels of trade on or before June 4, 2011.

After June 4, 2011 any rodenticide product released by registrants must comply with the RMD. Retailers, in possession of non-compliant products released to them on or before June 4, 2011 may sell the non-compliant products until exhaustion.

Please let me know if you have any further questions.

Regards,

Rusty_____
_____
Rusty Wasem
Chemical Review Manager
Special Review & Reregistration Division

Office of Pesticide Programs
(703)305-6979

▼ "John Lublinkhof" ---07/06/2009 04:59:46 PM---Rusty, Yes, I am referring to that table.

From: "John Lublinkhof" <jlublinkhof@belllabs.com>
To: Russell Wasem/DC/USEPA/US@EPA
Date: 07/06/2009 04:59 PM
Subject: Re: Mitigation- Rodenticides Questions

Rusty,

Yes, I am referring to that table.

Best regards,

John Lublinkhof
Bell Laboratories, Inc.

-----Original Message-----
From: Wasem.Russell@epamail.epa.gov
To: "John Lublinkhof" <jlublinkhof@belllabs.com>
Date: Mon, 6 Jul 2009 16:54:12 -0400
Subject: Re: Mitigation- Rodenticides Questions

> Good Afternoon John,
>
> When you cite page 30 of the RMD, are you referring to the table with
> the heading "3 Years after Publication of the Federal Register Notice
> Announcing the. . ." or something else?
>
> Rusty_____
> _____
> Rusty Wasem
> Chemical Review Manager
> Special Review & Reregistration Division
> Office of Pesticide Programs
> (703)305-6979
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> | From: |
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> |"John Lublinkhof" <jlublinkhof@belllabs.com>
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> |Russell Wasem/DC/USEPA/US@EPA
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> |Re: Mitigation- Rodenticides Questions
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> Rusty,
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> Thanks for your response. I need a little further clarification
> regarding Item 2. we understand that old labels can be placed on
> packages that are produced until June 2011. My question is regarding
> the
>
> stock that is potentially left in the warehouse after production is
> ceased with the old labeled material i.e. product for which amendments
> were sought. My other point is that there is no mention of this in the
> June 18, 2008 letter sent to registrants. However, on Page 30 of the
> mitigation decision document, it reads that the manufacturer would have
> 6 months beyond June 2011 to release this for shipment. Is this
> correct?
>
> Thanks,
>
> John Lublinkhof
> Bell Laboratories, Inc.
>
> -----Original Message-----
> From: Wasem.Russell@epamail.epa.gov
> To: "John Lublinkhof" <jlublinkhof@belllabs.com>
> Date: Wed, 1 Jul 2009 17:17:15 -0400
> Subject: Re: Mitigation- Rodenticides Questions
>
> > Good Afternoon John,
> >
> > To answer your questions.
> >
> > 1. We will treat labeling for the rodenticide bait stations as we do
> > for other similar bait stations (e.g., ant/roach stations). For
> those
> > we require the following to be on the station: product name,
> > registration number, a.i. statement, signal word with a modified
> KOROC
> > statement like "Do not allow children or pets to play with the bait
> > station", and a referral statement to the complete labeling.
> > Rodenticide bait stations will also require labeling statement
> > corresponding to which Tier it achieves (taken directly from the
> RRM).
> > Due to the size of mouse stations complete labels are an option, at a
> > minimum mouse bait stations must contain all of the details mentioned
> > above.
> >
> > 2.   if the mitigation language is added by an "amendment" and not by
> > reregistration we will allow old labels to be used through June 2011.