From: Jennifer Gaines
To: Gaines.jennifer@epa.gov
Subject: Fw: epa risk mitigation
Date: 05/31/2012 11:32 AM

Jennifer Gaines
Wildlife Biologist
U.S. Environmental Protection Agency
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----- Forwarded by Jennifer Gaines/DC/USEPA/US on 05/31/2012 11:29 AM -----

From: Russell Wasem/DC/USEPA/US
To: "Walt Cline" <walt@doyourownpestcontrol.com>
Cc: Neil Anderson/DC/USEPA/US@EPA, Bill Jacobs/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA, Khue Nguyen/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA, Rosanna Louie-Juzwiak/DC/USEPA/US@EPA
Date: 05/18/2011 02:44 PM
Subject: Re: epa risk mitigation

Walt,

My colleague (thanks Bill) cc'ed on the email suggested I clarify the last point.

While none of the affected active ingredients were made restricted use, the intent was that only professional applicators (Ag & PCO) would have access to loose bait.

Best,

Rusty_____
_____
Rusty Wasem / Chemical Review Manager
Risk Management & Implementation Branch 1*
Pesticide Re-evaluation Division* / Office of Pesticide Programs
703 / 305 6979

▼ Russell Wasem---05/18/2011 02:36:41 PM---No worries Walt, Actually the active in Terad, cholecalciferol, is affected by the Risk Mitigation D

From: Russell Wasem/DC/USEPA/US
To: "Walt Cline" <walt@doyourownpestcontrol.com>
Cc: <Anderson.Neil@epamail.epa.gov>, <Louie-Juzwiak.Rosanna@epamail.epa.gov>, <Gaines.Jennifer@epamail.epa.gov>, <Peacock.Dan@epamail.epa.gov>, <Jacobs.Bill@epamail.epa.gov>, <Nguyen.Khue@epamail.epa.gov>
Date: 05/18/2011 02:36 PM
Subject: Re: epa risk mitigation

No worries Walt,

Actually the active in Terad, cholecalciferol, is affected by the Risk Mitigation Decision.

You would not be required to sell them a bait station in the scenario you have described below. Consumer/homeowner/residential products are required to be pre-packaged and sold with a bait station and to contain no more than 1lb of bait (either 1st Generation anticoagulant or non-anticoagulant). This pre-packaging that combines a bait station and bait is the responsibility of the rodenticide manufacturer.

Please be aware when products bearing the new restrictions begin being distributed, the 4lb buckets of bait will be labeled for use by professional applicators. While none of the affected active ingredients were made restricted use the intent was to limit the access of loose bait to non-professional applicators.

Best,

Rusty_____
_____
Rusty Wasem / Chemical Review Manager
Risk Management & Implementation Branch 1*
Pesticide Re-evaluation Division* / Office of Pesticide Programs
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▼ "Walt Cline" ---05/18/2011 01:26:40 PM---Rusty, another question that we need to be clear on. We have a retail store (Do It Yourself Pest C

From: "Walt Cline" <walt@doyourownpestcontrol.com>
To: Russell Wasem/DC/USEPA/US@EPA
Date: 05/18/2011 01:26 PM
Subject: Re: epa risk mitigation

Rusty, another question that we need to be clear on. We have a retail store

(Do It Yourself Pest Control) and an on line store. If some one walks in an

we sell them a 4lb bucket of Terad (not on the ban list) are we required to sell them, or package a tamper resistent station with the product? This person would not be a PCO or AG. It could be a homeowner or a business owner.
Don't want to be a pain, just want to be in compliance with the new laws.
Thank you,

Walt Cline
Do It Yourself Pest Control
Pro Pest Products
2823 Chamblee Tucker Rd.
Atlanta, Ga.
30341
1-800-476-3368
----- Original Message -----
From: <Wasem.Russell@epamail.epa.gov>
To: "Walt Cline" <walt@doyourownpestcontrol.com>