Dr. Owen James, D.V.M.
State of Montana
Department of Livestock
Capitol Station
Helena, MT 59620

Dear Dr. James:

Subject: Sodium Fluoroacetate (Compound 1080) Livestock Protection Collar
EPA Registration No. 35975-4
Your Submission of November 7, 1991

We have reviewed the monitoring report for 1990. Thank you for submitting it.

Your revised Confidential Statement of Formula (CSF) lacks the following information for the ingredient [REDACTED]:

a. nominal batch weight,
b. nominal concentration,
c. upper certified limit, and
b. lower certified limit.

Submit a revised CSF which includes this information.

The proposed revised labeling did not include separate copies of the container label. The container label included as an appendix to the technical bulletin specifies a concentration (1.04%) of sodium fluoroacetate which differs from that (1.00%) claimed on the container label accepted on November 17, 1989, and from the nominal concentration on your revised CSF. The nominal concentration claimed on the label and the CSF must be the same. The nominal concentration claimed must be within the range covered by the certified limits. Therefore, either 1.04% or 1.00% sodium fluoroacetate could be claimed. Submit a revised container label which claims the same nominal concentration as you claim in your revised CSF.
The revised technical bulletin is acceptable except for the problems listed below.

a. In item "III. 1. B. (2)" (at the top of page 11), move the text "by the registrant" so that it follows "or entrusted" and immediately precedes "to the care of any person."

b. On page 13, change the name and address following the single asterisk (*) to

Robert A. Forrest  
Registration Division (H7505C)  
U.S. Environmental Protection Agency  
Washington, DC 20460  
Telephone (703) 305-6600.

Sincerely yours,

Robert A. Forrest  
Product Manager 14  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)