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JUN 15 1992

Mr. Stephen Smith
LiphaTech, Inc.
3600 West Elm Street
Milwaukee, WI 53209

Dear Mr. Smith:

Subject: Rozol Rodenticide Mineral Oil Concentrate
EPA Registration No. 7173-72
Your Letter Dated June 3, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below.

1. The **PESTICIDE DISPOSAL** statement should be modified to comply with PR Notice 83-3 to read as follows:

"Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance."

2. The statement "Do not contaminate water by cleaning of equipment or disposal of wastes" should be included as the last sentence of **ENVIRONMENTAL HAZARDS**, rather than under **PESTICIDE DISPOSAL** as you propose (see 40 CFR § 156.10(h)(2)(ii)(F)).
3. Under **NOTE TO PHYSICIAN:**, delete the comma after "ingested" in the first sentence.

A stamped copy of the label is enclosed for your records.

CONCURRENCES

SYMBOL	SURNAME	DATE						

~~A stamped copy of the label is enclosed for your records.~~

Submit one copy of the finished labeling before releasing the product for shipment.

Sincerely yours,



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

Enclosure: Stamped label

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
DANGER**

Keep away from humans, domestic animals, and pets. Fatal (poisonous) if swallowed, or absorbed through skin. Do not breathe vapor, or spray mist because this material will reduce the clotting ability of the blood and cause bleeding. Exposure during pregnancy should be avoided.

Do not get in eyes, on skin, or on clothing. Wear rubber gloves when handling as this product can be absorbed through the skin. Wash arms, hands, and face with soap and water after using and before eating or smoking. Contaminated clothing should be removed and washed before reuse.

In case of contact with skin, wash thoroughly with soap and plenty of water, for eyes, flush with plenty of water. If swallowed, call a physician immediately.

NOTE TO PHYSICIAN:

If ingested, or absorbed by humans, domestic animals or pets, this material will reduce the clotting ability of the blood and cause bleeding. In such cases, treat as in bishydroxycoumarin overdoses, giving Vitamin K orally or intramuscularly in mild cases and giving Vitamin K₁ intravenously and blood transfusions in severe cases. Repeat as necessary, based on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Keep out of lakes, streams or ponds.

WARRANTY: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

EPA Reg. No. 7173-72 EPA Est. No. 7173-WI-1



**RODENTICIDE MINERAL OIL
CONCENTRATE**

**A RODENTICIDE FOR FORMULATION INTO
REGISTERED END-USE RODENTICIDES**

Active Ingredient:	
2-[(p-Chlorophenyl)phenylacetyl]-1,3-indandione*.....	0.28%
Inert Ingredients.....	99.72%
TOTAL.....	100.00%

*Chlorophacinone-L-phadione

KEEP OUT OF REACH OF CHILDREN

POISON DANGER

STATEMENT OF PRACTICAL TREATMENT
 IF ON SKIN: Wash with plenty of soap and water.
 IF IN EYES: Flush with plenty of water.
 Get medical attention if irritation persists.
FATAL IF SWALLOWED OR ABSORBED THROUGH SKIN

See left panel for additional precautionary statements.

LIPHA/TECH

LiphaTech, Inc.
3101 W. Custer Ave.
Milwaukee, WI 53209

NET CONTENTS: 5 GAL. (18.93 L)

RECEIVED
EPA
JUN 15 1992
Under the Federal Insecticide, Fungicide, and Rodenticide Act amended, for the purpose of being listed under EPA Reg. No. 7173-72

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Product No.