

7173-113

5/12/2014

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UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
WASHINGTON, D.C. 20460

**NOTIFICATION**

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

**MAY 12 2014**

Tom Schmit  
Liphatech, Inc.  
3600 W. Elm Street  
Milwaukee, WI 53209

Subject: Notification to add a state of California restriction to the label,  
EPA Registration No. 7173-113  
Primary Brand Name: Rozol Tracking Powder  
Submission Date: April 3, 2014

Dear Mr. Schmit:

The Agency is in receipt of your Application for Pesticide Notification under PRN 98-10 dated and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records. If you have any questions, please contact Gene Benbow at (703) 347-0235 or via email at [benbow.gene@epa.gov](mailto:benbow.gene@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Gene Benbow".

Gene Benbow  
Wildlife Biologist  
Insecticide-Rodenticide Branch  
Registration Division (7505P)



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 7173-113	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Rozol Tracking Powder	PM# 07, Insecticide/Rodenticide Br	
5. Name and Address of Applicant (Include ZIP Code) Lipnatech, Inc. 3600 W. Elm Street Milwaukee, WI 53209 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.) **NOTIFICATION (per PR Notice 98-10) of:**  
**Addition a non-pesticidal label element: California Proposition 65 carcinogen warning for crystalline silica content.**  
 This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the label or the confidential statement of formula for this product. I understand that it is a violation of 18 USC Se. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Glass	<input checked="" type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 pound up to 50 pounds		5. Location of Label Directions <input checked="" type="checkbox"/> On label	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Thomas Schmit	Title Manager of Regulatory Affairs	Telephone No. (Include Area Code) (414) 410-7230
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received  <b>(Stamped)</b>
2. Signature 	3. Title Manager of Regulatory Affairs	
4. Typed Name Thomas Schmit	5. Date 3 April, 2014	

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
Ariel Rios Building  
1200 Pennsylvania Ave NW  
Washington, DC 20460

Attn: Reuben Baris, PM Team 7

3 April, 2014

Re: Notification for  
Rozol Tracking Powder, EPA Reg. No. 7173-113 [REDACTED]  
[REDACTED]

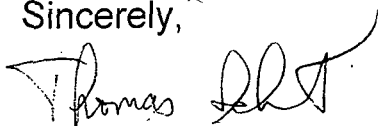
Dear Mr. Baris,

The products listed above require a cancer warning in order to comply with California's Proposition 65 requirements. We believe that this is a non-pesticidal label element and can be added by notification.

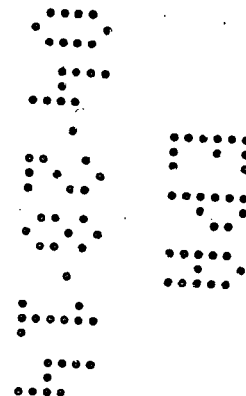
A separate notification is enclosed for both products. The warning statement is shown at the bottom of the third page of each product label, and is outlined in red.

Please contact me directly at (414) 410-7230 if you have questions concerning this submission.

Sincerely,



Thomas Schmit  
Manager of Regulatory Affairs



**RESTRICTED USE PESTICIDE  
DUE TO HIGH ACUTE TOXICITY**

For retail sale to and use by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certificate.

# ROZOL® TRACKING POWDER

**For Use Indoors and in Burrows Leading Into Buildings Only**

Active Ingredient: chlorophacinone .....	0.2%
Inert Ingredients .....	<u>99.8%</u>
Total .....	100.0%

EPA Reg. No. 7173-113

EPA Est. No. 7173-WI-1

**KEEP OUT OF REACH OF CHILDREN**

## WARNING:

See side panel for additional precautionary statements.

(Liphatech Logo)  
Liphatech, Inc.  
3600 W. Elm Street  
Milwaukee, WI 53209  
(414) 351-1476

NET WEIGHT: 1 pound up to 50 pounds

### NOTIFICATION

MAY 12 2014

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Left Panel:

**PRECAUTIONARY STATEMENTS:**

**Hazard to Humans and Domestic Animals**

**WARNING:** May be fatal if swallowed. Wash thoroughly with soap and water after handling and before eating or smoking. This product can be absorbed through the skin. Wear a respirator and gloves when applying or handling this product. Keep away from humans, domestic animals and pets. Any person who retrieves carcasses or unused bait following application of this product must wear gloves. All handlers (including applicators) must wear: long sleeved shirt and long pants, shoes plus socks, gloves, protective eyewear and a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P or HE filter.

**User Safety Requirements:** Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

**FIRST AID:** Have this label with you when obtaining treatment advice. **If swallowed:** Call a poison control center or doctor immediately for treatment advice. **If in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. **If on skin or clothing:** Take off contaminated clothing. Rinse skin with plenty of cool water for 15-20 minutes. Call a poison control center or doctor for treatment advice. **If inhaled:** Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice.

**TREATMENT FOR PET POISONING:** If animal eats tracking powder, call veterinarian at once.  
**NOTE TO VETERINARIAN: Anticoagulant Chlorophacinone:** For animals ingesting tracking powder and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K<sub>1</sub>.

**Note to Physician:** Contains chlorophacinone, an anticoagulant. For humans that have ingested this product, or have obvious poisoning symptoms (bleeding) or prolonged prothrombin times, give Vitamin K<sub>1</sub> by intramuscular or oral administration. Check prothrombin time every 3 days until values return to normal.

**ENVIRONMENTAL HAZARDS:** This product is toxic to fish and wildlife. Dogs and predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

**STORAGE AND DISPOSAL:** Do not contaminate water, food or feed by storage or disposal. **Pesticide Storage:** Store in original container in a cool, dry place inaccessible to children and pets. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** This is a nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or dispose of empty container in a sanitary landfill, or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**WARRANTY:** To the extent consistent with applicable law, 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.

Product No.  
Label No.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**USE RESTRICTIONS:** Use only against Norway rats, Roof rats and House mice inside of homes, industrial and agricultural buildings, and similar man made structures. Rozol Tracking Powder may also be dusted into rat burrows that are located along the periphery of buildings and that are likely to serve as routes of entry into these structures. Tracking powder must be placed in locations not accessible to children, pets, domestic animals or non-target wildlife. Do not apply powder in areas where there is a possibility of contaminating water, food, feedstuffs, food or food handling equipment, or milk or meat handling equipment or surfaces that come in direct contact with food. Applications in these areas are limited only to concealed, inaccessible places such as wall voids. Do not apply powder along walls or in corners or in open floor areas. Do not place near or inside ventilation duct openings. Use only for sites, pests, and application methods described on this label.

**SELECTION OF TREATMENT AREAS:** Determine dry areas where rats and house mice will most likely pick up the powder on their feet or fur and ingest it during grooming. Generally, these areas are along walls, by gnawed openings and burrows, in corners and concealed places, in spaces between floors and walls, or in locations where rodents or their signs have been observed. Remove goods piled directly on the floor and place on skids. Use boxes or other obstacles to force rodents to travel through constricted areas. Give special attention to the climbing ability of Roof rats. For this species, use suitable PVC, sheet metal, cardboard or similar rigid tubing securely attached to rafters or other horizontal surfaces where rats will pass. Employ tubes long enough to minimize spillage of powder through the ends.

**APPLICATION DIRECTIONS:**

For House mice use at the rate of 1 oz. powder per 2.5 sq. ft. of runway area.

For Norway and Roof rats use at the rate of 2 oz. powder for 2.5 sq. ft. of runway area.

Apply the powder into the rat burrow or holes or within walls with a hand bulb or similar duster. Do not use power dusting devices. Sprinkle the powder in patches in such a manner as to expose the rats and house mice to it. Patch size may be (but not limited to) 6 inches x 12 inches and should be adapted to each situation. For burrows that are located along the periphery of buildings and that are likely to serve as routes of entry into these structures, place about 5 grams of tracking powder in each burrow. Close burrows with soil, loose leaves or paper. Repeat treatment if burrows are reopened. Maintain powder in treated areas for at least 20 days. Wearing gloves, collect and dispose of all visible dead animals and used powder promptly. Repeat treatment when infestation recurs. Where a continuous source of infestation is present, establish permanent tracking powder stations and replenish the powder as needed.

CA Prop. 65: Notice: This product contains a chemical known to the State of California to cause cancer.