NOV = 3 1992

Mr. Stephen Smith LiphaTech, Inc. 3600 West Elm Street Milwaukee, WI 53209 5420879 345

Dear Mr. Smith:

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable, subject to the following provisions:

- Submit and/or cite all data required for registration/ reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
- Submit one copy of your final printed labeling before you release the product for shipment.
- 3. The rat efficacy study performed with fresh bait is acceptable. It has been assigned the MRID Number 423677-06. Contrary to the conclusion reached by your laboratory, however, we found that bait acceptance by the sexes was significantly different (p <0.05, "t" test using two means; p <0.002, Mann-Whitney U Test).

The mouse efficacy study performed with fresh bait is acceptable. It has been assigned the MRID Number 423677-07. The mouse study with weathered bait (MRID# 423677-05) also is acceptable. In future mouse efficacy trials, cage subjects individually or in single-sex subgroups of 5 or 10 animals. The enclosed draft protocol (1.204) indicates procedures to use in future mouse tests with anticoagulant dry baits.

The proposed revised label submitted on June 16, 1992, is acceptable. When you print labels, be sure to center the heading "DIRECTIONS FOR USE" in the left panel. other headings in that panel (e.g., "IMPORTANT", "USE RESTRICTIONS", "APPLICATION DIRECTIONS", etc.) all are supposed to be subordinant to "DIRECTIONS FOR USE".

CONCURRENCES									
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ESA Form 1320-14 /1/0/1

The heading "PRECAUTIONARY STATEMENTS" should also be centered above the precautionary statements block and above the subordinant subheading "HAZARD TO HUMANS AND DOMESTIC ANIMALS".

Because there is no application equipment for this product, delete ". . . into application equipment" from the first sentence under "CONTAINER DISPOSAL".

- 5. The label accepted on October 23, 1991, may be used until December 16, 1993, or until supplies are exhausted, whichever comes first.
- 6. Submit data on Storage Stability (GRN 63-17) when completed, no later than 15 months from the date of this letter.

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

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

Sincerely yours,

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

Enclosures: 1) Stamped label

2) Frotocol 1.204

-11:11 1175-151

mid CORMS in EPA Letter

NOV 53

Under the Pederal Pungicide, and Ros as assented, for registered under E

DIRECTIONS FOR USE: It is this product in a manner incons

READ THIS LABEL: Read directions and use precautions.

IMPORTANT: Do not expose animals to rodenticides. To hel 1, Store product not in use in a

2. Apply bait in locations out o animals and nontarget widilife, These stations must be resist children under six years of age, prevents such children form re obtaining bait. If a bait can be a lifted, units must be secured stronger bait stations are needs raccoons, bears, or other pol areas prone to vandalism.

Dispose of product container best as specified on this label.

USE RESTRICTIONS: For or House mice in and around hor man-made structures. Do not possibility of contaminating to contact with food. Do not broke

SELECTION OF TREATM! where rats and or mice will mo Generally, these are along wall burrows, in corners and concealts, or in locations where roc Protect ball from rain or snow.

APPLICATION DIRECTIONS RATS: Apply 4 to 16 ounces uninterrupted supply of fresh bit MICE: Apply 1/4 to 1/2 oz. (1-12-foot intervals. Larger place at points of very high mouse supply of fresh beit for at least RATS/MICE: Replace contain Collect and dispose of all dear To prevent reinfestation, limit harborage as much as possibly treatment. Where a continuous establish permanent bait statio

PRECAUTIONARY STATEMENTS: HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. Keep away from feed or foodstuffs. May be harmful or fatal if swallowed or absorbed through the skin because this material may reduce the clotting ability of blood and cause bleeding.

This product should be handled with gloves. Do not get in eyes, on skin or on clothing. Wash arms, hands and face with soap and water applying and before eating and smoking. If swallowed, call a physician immediately.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K_1 intramuscularly or orally as inoicated in bishydroxycoumarin overdose. 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. Do not contaminate water by cleaning of equipment or disposal of wastes.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.

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 disposed of on site or at an approved waste disposal facility.

CONTAINSR DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landful or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke

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



PELLETS

FOR INDOOR AND OUTDOOR USE.
KILLS HOUSE MICE AND NORWAY
AND ROOF RATS.

ACTIVE INGREDIENT.	
2 [(P-CHLOROPHENYL) PHENYLACETYL]-1,3-	
INDANDIONE*	0 005%
INERT INGREDIENTS	99 995%
	100 000%

*Chlorophacinone-Liphadione

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

MANUFACTURED BY

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

EPA Reg. No. 7173-151 EPA Est. No. 7173-WI-001

NET WEIGHT: 50 lbs.