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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 6, 2007

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

300 5-810 317
1165

Attention: Ms. Rachel M. Callies

Subject: Rozol Pellets
EPA Reg. No. 7173-151
Your amended application of September 29, 2006
Our approval of March 26, 2007
Your letter of March 30, 2007

Purpose The purpose of this submission is to revise the label according to our previous letter, with one exception, and to include a statement accepting your September 29, 2006, Confidential Statement of Formula (CSF).

CSF Your CSF dated September 29, 2006, is acceptable, as modified by our previous letter. A copy has been placed in our files for this product. All other versions are obsolete.

Review In your letter you objected to adding the word "only" to the 1st Sentence of your "USE RESTRICTIONS" so that it would read, "This product may only be used to control Norway rats, roof rats and house mice."

You objected because you believed that the word is not found on any of your labels and those of your competitors.

We need qualifying statements, such as the one mentioned in our letter, to insure that applicators do not apply the product for uses other than those listed on the label under section 2(ee). Without such statements, applicators could use the product for uses for which we have not evaluated the hazards and risks. Such statements currently appear on

other rodenticide labels and will occur on more labels in the future.

As you are aware, the Agency is currently beginning the process of implementing risk reduction measures for structural and nonstructural uses that may result in additional restrictions. To the extent possible, we will attempt to apply restrictions at the same for similar types of products.

Label The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following change, before you ship your product.

1. Revise the 1st Sentence of your "USE RESTRICTIONS" to read, "This product may **only** be used to control Norway rats, roof rats and house mice.

Existing stocks Stocks of existing labels may be used for eighteen (18) months.

Questions If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock,dan@epa.gov (by E-Mail).

Sincerely yours,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosure Stamped label

Dan Peacock, Flash Drive, C:\Documents and Settings\dpeacock\My Documents\Chlorophacinone\7173-151, data, add dye, revised label, 3-26-2007.doc

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. If swallowed, this product reduces the clotting ability of blood and causes bleeding. Avoid contact with eyes, skin or clothing. Wear gloves when handling bait or animals. Wash arms, hands and face with soap and water after applying and before eating and smoking.

FIRST AID

Have this label with you when obtaining treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

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.

Note to Physician or Veterinarian: Contains chlorophacinone, an anticoagulant. For humans or dogs that have ingested this product, or have obvious poisoning symptoms (bleeding) or prolonged prothrombin times, give Vitamin K₁ 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. 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. This is a nonrefillable container.

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 Disposal: 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.

EPA Reg. No. 7173-151
EPA Est. No. 7173-WI-1

Product No. Label



PELLETS

FOR INDOOR AND OUTDOOR USE

**KILLS HOUSE MICE,
NORWAY RATS, AND ROOF RATS**

Active Ingredient: chlorophacinone 0.005%
Inert Ingredients 99.995%
Total 100.000%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**
See side panel for additional precautionary statements.

LIPHA/TECH®

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

ACCEPTED Net Weight:
with COMMENTS
EPA 12 OZ BULK
12 ounce package containing 1
pound up to 50 pounds

JUL 6 2007

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.**

7173-151
**Alternate "Storage and Disposal" statement for packaging
intended solely for household use:**

STORAGE AND DISPOSAL

This is a nonrefillable container.
Storage: Store in original container in a dry place inaccessible to children and pets.
Disposal: If empty: Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Alternate warranty statements:
Satisfaction guaranteed or your money back.

Page 1 of 1, Product label for EPA Reg. No. 7173-151, Submitted 9/29/06

DIRECTIONS FOR USE

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

READ THIS LABEL and follow all use directions and precautions.

IMPORTANT: Do not expose children, pets or other nontarget animals to rodenticides. To help prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals, and nontarget wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears, other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container, unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS: This product may be used to control Norway rats, roof rats and house mice. Do not place near or inside ventilation duct openings. Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment.

May be used in and around homes, industrial, commercial, agricultural and public buildings. It may also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product is especially well suited for use in wet or damp areas, including river banks, gullies, irrigation ditches, railroad tracks, loading areas, under granaries, along fence lines and buffer strips, garbage dumps and landfills.

Do not apply bait directly to ground surface or in grass or other ground cover. Where necessary, apply in tamper-resistant bait stations to prevent non-target animals from accessing the bait. Do not broadcast bait.

Selection of Treatment Areas: Determine areas where rats or mice are likely to find and consume bait, such as along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors or walls, or locations where rodents or their signs are seen. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

(Qualifier statement only for 12 ounce package.)
This package contains enough bait (12 oz.) to kill 3 to 12 rats.

Mice: Apply 1/4 to 1/2 ounce of bait (1-2 level tablespoons) per placement, usually spaced 8 to 12 feet apart. Larger amounts (up to 2 ounces) may be needed at points of very high mouse activity. Maintain a constant supply of fresh bait for 15 days or until signs of mouse activity cease.

Rats: Apply 4 to 16 ounces of bait per placement, usually spaced 15 to 30 feet apart. Maintain a constant supply of fresh bait for 10 days or until fresh signs of rat activity cease.

For rat burrows, insert 1 to 2 ounces of bait deep into each active burrow. Check treated burrows each morning and evening to make sure that bait has not been pushed out of burrows.

Follow-up: Replace contaminated or spoiled bait immediately. Wearing gloves, collect and dispose of all dead animals and leftover bait, as well as any bait that has become accessible to non-target animals. To discourage reinfestation, limit sources of rodent food, water and harborage as much as possible. If reinfestation does occur, repeat treatment. For a continuous infestation, set up permanent bait stations and replenish bait as needed. (27206)