

NOV 5 1992

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

Dear Mr. Smith:

Subject: ROZOL RAT AND MOUSE KILLER PELLETS
EPA Registration No. 7173-161
Your Letter Dated June 16, 1992

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

1. 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.
2. 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.

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

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

supposed to be subordinate to "DIRECTIONS FOR USE".

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

Because this product is packaged in a container weighing less than 5 pounds, you may, if you desire, use the abbreviated "household" storage and disposal statements in PR Notice 83-3. Appropriate statements would be as follows:

STORAGE AND DISPOSAL

STORAGE: Store only in original container, in a dry place inaccessible to children and pets.

DISPOSAL: Do not reuse empty container*. Securely wrap in newspaper and discard in trash.

Note: If container is a bottle, can, or jar, add "Rinse container thoroughly." as second sentence under "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)

Enclosure: Stamped label

11/05/92:WAE:DISK4:7173-161.EFF

ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV 5 1992

Under the Federal Insecticide,
Fungicide, and Rodenticide
Act, as amended, for the pesticide
as amended, for the pesticide
EPA Reg. No. 7173-161

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 after applying and before eating and smoking. If swallowed, call a physician immediately.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K₁ intramuscularly or orally as indicated 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 be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: 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: 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 when such use and/or handling is contrary to label instructions.



RAT & MOUSE KILLER PELLETS

EASY TO HANDLE,
FOR INDOOR AND OUTDOOR USE.

ACTIVE INGREDIENT:	
2-[(P-CHLOROPHENYL) PHENYLACETYL]-1,3-INDANOLONE*	0.005%
INERT INGREDIENTS.....	99.995%
TOTAL:	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. 7173-161
EPA Est. No. 7173-WI-001

NET WEIGHT: 12 OZ.

DIRECTIONS FOR USE: Read this product in a manner consistent with the directions and use precautions.

READ THIS LABEL: Read the directions and use precautions.

IMPORTANT: Do not expose animals to rodenticides. To help prevent such children from re-obtaining bait, if a bait can be sifted, units must be secured in stronger bait stations are needed in areas prone to vandalism.

1. Store product not in use in a locked container.
2. Apply bait in locations out of reach of animals and nontarget wildlife. These stations must be resistant to children under six years of age, prevents such children from re-obtaining bait. If a bait can be sifted, units must be secured in stronger bait stations are needed in areas prone to vandalism.
3. Dispose of product container, bait as specified on this label.

USE RESTRICTIONS: For control of house mice in and around human-made structures. Do not use in areas where there is a possibility of contaminating food contact with food. Do not broadcast.

SELECTION OF TREATMENT: where rats and/or mice will not be exterminated. Generally, these are along walls, burrows, in corners and concealed walls, or in locations where rodents are not exposed to sunlight. Protect bait from rain or snow, as possible.

APPLICATION DIRECTIONS:
RATS: Apply 4 to 16 ounces of uninterrupted supply of fresh bait.
MICE: Apply 1/4 to 1/2 oz. (1-2 inch intervals). Larger placements at points of very high mouse activity. Supply of fresh bait for at least 12 hours.
RATS/MICE: Replace contaminated bait. Collect and dispose of all dead rodents. To prevent reinfestation, limit food and harborage as much as possible. Repeat treatment. Where a continuous supply of fresh bait is needed, establish permanent bait stations.

