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Edward F. Marshall LiphaTech, Inc. 3101 West Custer Ave. Milwaukee, WI 53209

Subject: Maki Rat and Mouse Meal Bait (Packs)

EPA Reg. No. 7173-171

Response to PR Notice 94-7

Resubmission of Amended Labeling Dated June 14, 1995

Dear Mr. Marshall,

)

We have reviewed the labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, and pursuant to PR Notice 94-7. The subject amended labeling is acceptable provided that you:

- 1. Modify the "DIRECTIONS FOR USE" section on the outer package label so that the entire paragraphs entitled "URBAN AREAS" and "NONURBAN AREAS" are indented at least two spaces so that it is clear to the reader that the headings of these paragraphs are subordinate to "USE RESTRICTIONS" and that the final paragraph of this section, which pertains to placement of bait, applies to all permissible urban and nonurban uses of this product.
- 2. Change the "ENVIRONMENTAL HAZARDS" statement on both the outer package label and individual placepack labels to read

"This product is toxic to mammals and birds. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark."

- 3. Amend the "STORAGE AND DISPOSAL" statement on both the outer package label and individual placepack labels as indicated below.
 - a. If your product is intended for both commercial and household uses, change the "PESTICIDE DISPOSAL" and "CONTAINER DISPOSAL" directions to read

CONCURRENCES						
SYMBOL)	7505C					
RURHAME	Perseult					
ATE	8/17/95					
EPA Form 1320-1A (1/90) Printed on Recycled Paper					OFFICIAL FILE COP	

"PESTICIDE DISPOSAL:

Commercial use: Wastes resulting from the use of this product should be securely wrapped in several layers of newspaper and then disposed of onsite or at an approved waste disposal facility. Household use: Securely wrap wastes resulting from the use of this product in several layers of newspaper and discard in trash."

"CONTAINER DISPOSAL:

Commercial use: 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.

Household use: Do not reuse container. Wrap container securely in several layers of newspaper and discard in trash."

- b. If your product is intended either solely for commercial use or solely for household use, the label must only include the appropriate commercial or household disposal directions under "PESTICIDE DISPOSAL" and "CONTAINER DISPOSAL".
- 4. Submit one copy of your final printed labeling for both the outer package and individual placepacks before you release the product for shipment. We caution you to refrain from adding any claims or directions to the final printed label that were not part of the stamped accepted label.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). 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. If you have any questions regarding this letter, please contact Peg Perreault at (703) 305-5412 or (703) 305-6600.

J

Sincerely yours,

Robert A. Forrest Product Manager (14)

Insecticide-Rodenticide Branch Registration Division (7505C)

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. 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.

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 at once.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K₁ intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS

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

STORAGE AND DISPOSAL:

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL. STORE IN ORIGINAL CONTAINER IN LOCKED STORAGE AREA.

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

PESTICIDE DISPOSAL: Securely wrap excess, unused or spoiled bait in several layers of newspaper and discard in trash.

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

KEEP AWAY FROM FOODSTUFFS

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.

> ACCEPTED with COMMENTS In EPA Letter Dates

MANUFACTURED BY:

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

EPA EST. NO. 7173-WIAUG 17 1995

Finder the Federal Incoeffede.
Finder de out to successive TWEIGHT: 4.69 to (50 x 1.5 oz.)

RAT AND MOUSE MEAL BAIT (PACKS)

KILLS NORWAY RATS, ROOF RATS, HOUSE MICE AND WARFARIN RESISTANT NORWAY RATS

NORWAY RATS AND HOUSE MICE MAY CONSUME A LETHAL DOSE IN ONE FEEDING WITH FIRST DEAD RODENTS APPEARING FOUR OR FIVE DAYS AFTER TREATMENT BEGINS

ACTIVE INGREDIENT:
"3-[3-(4'-bromo[1,1'-biphenyl]-4-yl)-3-hydroxy-1-phenylpropyl]-4-hydroxy-2H-1

*Bromadiolone-Supercaid Patented in the U.S.A.

KEEP OUT OF REACH OF CHILDREN

CAUTION

MAY BE HARMFUL OR FATAL IF SWALLOWED

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

animals to rodenticides. To h 1. Store product not in use in a

It is a violation of Federal !

inconsistent with its labeling.

READ THIS LABEL: Rea

directions and use precautions

IMPORTANT: Do not exp

DIRECT

pets.
2. Apply bait in locations ou animals and nontarget wildlife These stations must be res children under six years of a prevents such children from obtaining bait. If bait can be lifted, units must be secure stronger bait stations are nee raccoons, bears, or other ; areas prone to vandalism.

Dispose of product contain bait as specified on this label.

USE RESTRICTIONS:

For control of Norway Rats, F URBAN AREAS: This pr periphery of homes, industri This productmay also be us aircraft) andin andaround n product may be used in alleys NON URBAN AREAS: homes and agricultural buildis

Do not place bait in are contaminating food or surfa food. Do not broadcast bait.

SELECTION OF TREATMS Determine areas where rats consume the bait. General openings, in or beside burro between floors and walls, o signs have been seen. R possible.

APPLICATION DIRECTION RATS: Apply 3 to 10 place Space bait placements 15 Maintain an uninterrupted su fresh signs of rat activity ceas MICE: Open the pack and p of bait per typical placement needed at points of extre placements at intervals of supply of fresh bait for 15 day

cease to appear.
RATS AND MICE: Re immediately. Collect and preletioner beit, and any bait the animals. To prevent reinferwater, and hyperson as mice. water, and herborage as mu occur, repeat treatment. Wi is present, establish permar needed.

EPA REG. NC. 7173 171



PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Keep away from humans, domestic animals and pets. 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.

Do notget in eyes, on skin or on clothing. Washarms, hands and face with soap and water after applying and before eating and smoking.

If swallowed, call a physicien at once.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K₁ intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary bused on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS

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

STORAGE AND DISPOSAL:

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL, STORE IN ORIGINAL CONTAINER IN LOCKED STORAGE AREA.

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.

CONTAINER DISPOSAL: Offer empty wrapper for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities by burning. If burned stay out of smoke

KEEP AWAY FROM FOODSTUFFS

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 anc/or handling of this material when such use and/or handling is contrary to label instructions.

EPA REG 110, 7173 171

EPA EST. NO. 7173-WI-1



RAT AND MOUSE MEAL BAIT (PACKS)

KILLS NORWAY RATS, ROOF RATS, HOUSE MICE AND WARFARIN RESISTANT NORWAY RATS

NORWAY RATS AND HOUSE MICE MAY CONSUME A LETHAL DOSE IN ONE FEEDING WITH FIRST DEAD RODENTS APPEARING FOUR OR FIVE DAYS AFTER TREATMENT BEGINS

ACTIVE INGREDIENT:

*Bromadiolone-Supercaid Patented in the U.S.A.

KEEP OUT OF REACH OF CHILDREN

CAUTION

MAY BE HARMFUL OR FATAL IF SWALLOWED

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

MANUFACTURED BY:

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

NET WEIGHT: 1.5 oz (42.5 grams)

DIRECTIONS FOR USE

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

Read the entire label on the outer package before using this product. It is illegal to sell these placepacks individually...