

7173-184

04/17/2007

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

April 17, 2007

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805439

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

Attention: Mr. Thomas J. Schmit

**Subject**      **Rozol Pocket Gopher Bait**  
                  **EPA Reg. No. 7173-184**  
                  **Our letter of November 16, 2006**  
                  **Your letter of January 3, 2007**

**Purpose**        This submission proposes to revise the label for this product, under sec 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), to add the phrase, "For the Control of Pocket Gophers Only." on the Front Panel to prevent this product from being used to control other species, such as prairie dogs.

**Labeling**     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 changes, before you ship your product.

1. Under "WARRANTY", add the following text at the beginning of this section: "To the extent consistent with applicable law, ..."
2. Increase the type size of the minimum type from 5 to 6 points and the distance between letters so that the text is easily read by users and viewed in our Pesticide Product Label System (PPLS). We have increased the version that we received to resolve this problem partially. See Attachment 2.

- Existing stocks Forms** Stocks of product with existing labels may be used for eighteen (18) months.
- Consequence for non-compliance** 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 constitutes acceptance of these conditions.
- Questions** If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-305-6596 (fax); or [peacock.dan@epa.gov](mailto:peacock.dan@epa.gov) (E-Mail).

Sincerely,



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

- Attachments**
1. Stamped Label
  2. Minimum Type Size of Final Printed Label

**File Location** Dan Peacock, Flash Drive 1gb, E:\Chlorophacinone\7173-184, rev label, add -gophers only, 4-17-2007, final.doc

Label received enlarged 110%

**PRECAUTIONARY STATEMENTS**  
Hazard to Humans and Domestic Animals

**CAUTION:** Keep away from humans, domestic animals and pets. Harmful if swallowed or absorbed through the skin because the material may reduce the clotting ability of blood and cause bleeding. Avoid contact with skin, eyes or clothing. Wear shirt and long pants, shoes and socks, and chemical-resistant (such as waterproof) gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

**USER SAFETY REQUIREMENTS:** Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**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.

**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.

**Note to Physician:** This product may reduce the clotting ability of the blood and cause hemorrhaging. If poisoning symptoms occur, intramuscular and oral administration of Vitamin K<sub>1</sub> may be needed. For human cases, Vitamin K<sub>1</sub> is antidotal at 5-10 mg (not mg/kg) for children and 10-20 mg for adults. Repeated doses may be needed (based on monitoring of prothrombin times).

**TREATMENT FOR PET POISONINGS:** If pet or animal eats bait, call a veterinarian or hotline number (1-800-301-7976) at once.

**Note to Veterinarian:** This product contains chlorophacinone, an anticoagulant. For animals ingesting (or suspected of ingesting) bait, and/or having obvious poisoning symptoms, such as bleeding or lowered prothrombin times, give Vitamin K<sub>1</sub> at 2-5 mg/kg. Repeated doses may be needed for up to 30 days (based on monitoring of prothrombin times). It may be necessary to check prothrombin times every 3 days until values return to normal. In severe cases, blood transfusions may be necessary.

**ENVIRONMENTAL HAZARDS:** This product is toxic to fish and wildlife. Dogs and other 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. Do not contaminate water by cleaning of equipment or disposal of wastes. Runoff also may be hazardous to aquatic organisms in water adjacent to treated areas.

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



# POCKET GOPHER BAIT

## FOR THE CONTROL OF POCKET GOPHERS ONLY

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

EPA Reg. No. 7173-184  
EPA Est. No. 7173-WI-1

Product No.  
Label No.

**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**  
**WIRE COMMENTS**  
Net Weight: 5 to 50 pounds  
to EPA Letter Dated:

APR 17 2007

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

7173-184

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product by any method not specified on this label. Rozol Pocket Gopher Bait is recommended for use on lawns, golf courses, range land, and non-crop areas.

**ENDANGERED SPECIES CONSIDERATIONS:** Do not use this product within prairie dog towns in the range of the black-footed ferret without first contacting endangered species specialists, U.S. Fish and Wildlife Service, Denver Regional Office. This pesticide should not be used within one mile of active dens of the San Joaquin Kit Fox in the following California counties: Kern, Kings, Fresno, San Luis Obispo, Merced, Monterey, Santa Barbara, Ventura, Tulare, and San Benito. Prior to use, contact endangered species specialists at the California Department of Fish and Game or the U.S. Fish and Wildlife Service, Portland Regional Office for recommendations.

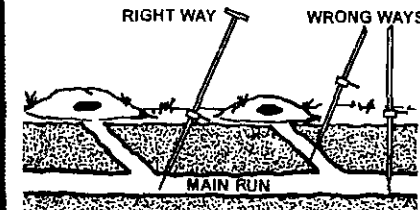
**Directions for placing Rozol Pocket Gopher Bait for Pocket Gopher control:** Burrowing pocket gophers (*Thomomys* sp. and *Geomys* sp.) throw out low, fan-shaped mounds on either side of their underground tunnel. These lateral tunnels coming to the surface are on the flat side of the fan and these holes plugged with loose soil.

**Treatment:** Can be made in one or both of the following ways.

1. With a long-handled tablespoon, carefully remove the plug on the flat side of the fan. Carefully insert 1/2 cup of bait as far down into the hole as possible. Reclose opening, being careful not to cover the bait with soil.

2. Using a metal rod, probe 6-12 inches deep to locate the main tunnel. Consult diagram below for location to probe. Drop 1/2 cup of bait into the tunnel and cover the hole so light will not enter the tunnel system. Consult Federal and State rodent control bulletins for a full discussion of pocket gopher burrowing habits.

Make 2-3 treatments per burrow system. Bury dead animals and spilled bait found on soil surface immediately using gloves. Maintain a constant supply of bait in the burrow system for as long as there is gopher activity. Do not apply bait on surface of soil.



The right and the wrong ways to use a probe for poisoning gophers are shown above. Be sure that bait is in the main runway - not in the laterals or imbedded in the bottom of the runway. (286030ny)

### 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 containers in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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