

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 18 1993

5428274 346/17

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

Dear Mr. Smith:

Subject: MAKI PARAFFINIZED PELLETS  
EPA Registration No. 7173-187  
Your Letter Dated October 12, 1992

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable, providing that you:

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. Make the labeling changes listed below before releasing the product for shipment bearing the amended labeling:

The "DIRECTIONS FOR USE" portion of the proposed revised label submitted on October 12, 1992, is acceptable except for the structure of the "USE RESTRICTIONS" section. You must indent the subheadings "URBAN AREAS" and "NON-URBAN AREAS" under "USE RESTRICTIONS" so that it is absolutely clear that the prohibitions against broadcasting bait or allowing bait to contact food apply to all usage of the bait and not just to use in "NON-URBAN AREAS."

3. Submit one copy of final printed labeling before you release the product for shipment.

The comments below apply to the efficacy data submitted to support the amendment:

After reviewing the six efficacy studies included with your submission of October 12, 1992, we accept them on the assumption that the bait tested corresponds in formulation to the bait described in the Confidential Statement of Formula (CSF) dated May 11, 1992, which we recently accepted. If a different bait composition was used in Batch # 11892, you must either submit an amended CSF which corresponds to the bait that

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

was tested or you must submit appropriate efficacy studies on the bait described by the CSF of May 11, 1992. The following studies were accepted:

- a. Norway rat test with 15-day scheduled bait-exposure period (MRID # 425298-01);
- b. Norway rat test with 3-day bait-exposure period (MRID # 425298-03);
- c. house mouse test with 15-day scheduled bait-exposure period (MRID # 425298-02); and
- d. house mouse test with 3-day bait-exposure period (MRID # 425298-04).

Although there still were legibility problems on the copies of the raw data sheets submitted and apparent transcription errors, the reports submitted on October 12, 1992, appeared to have been of better quality than those submitted earlier in 1992. Despite the comments in your letter of October 12, we still do not understand why you insist on running an unnecessary "t" test incorrectly.

We have amended our test protocols to update them and to correct various errors and problems with the versions of the protocols which have been circulating since 1980. Once again, we are providing to you copies of amended protocols which seem to be relevant to your products. We do not want to see new studies run with the older versions.

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with the conditions of this letter. 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)

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**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 K<sub>1</sub> intramuscularly or orally as indicated in bishydroxycoumarin overdoses. 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.

**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:** Triple rinse (or equivalent). Then offer 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 and/or handling of this material when such use and/or handling is contrary to label instructions.

# MAKI

## PARAFFINIZED PELLETS

### FOR INDOOR AND OUTDOOR URBAN RODENT CONTROL

**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-benzopyran-2-one.....	0.005%
Inert ingredients.....	99.995%
<b>Total</b>	<b>100.000%</b>

\*Bromadiolone-Supercald Patented in the U.S.A.

### KEEP OUT OF REACH OF CHILDREN

## CAUTION

May be harmful or fatal if swallowed or absorbed through the skin. 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. See left panel for additional precautionary statements

MANUFACTURED BY:

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

NET WEIGHT: 11 Lbs. (4.99 kg)

**FEB 18 1993**

EPA REG. NO. 7173-187

EPA EST. NO. 7173-WI-1

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

7173-187

**DIRECT**

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

**READ THIS LABEL:** Read and understand all directions and use precautions.

**IMPORTANT:** Do not expose to rodents. To help to prevent

1. Store product not in use in a

2. Apply bait in locations out of reach of and nontarget wildlife, or in bait stations must be resistant to destruction by six years of age, and must be secured or otherwise immobilized so that children from reaching into bait stations can be shaken from stations. Do not use in areas where potentially destructive animals,

3. Dispose of product container as specified on this label.

**USE RESTRICTIONS:** For use in House Mice.

**URBAN AREAS:** This product may be used in the periphery of homes, industrial, commercial, and institutional buildings, product may also be used in trains, aircraft and in related facilities. Do not use in areas where it may also be used in alleys.

**NON URBAN AREAS:** May be used in buildings.

Do not place bait in areas where food or surfaces that come in contact with bait.

**SELECTION OF TREATMENT AREAS:** Determine areas where rats or mice are present. Generally, these are areas beside burrows, in corners and cracks, or in locations where rodents are present. Protect bait from rain or snow if possible.

**APPLICATION DIRECTIONS:** **RATS:** Apply 4 to 16 ounces usually should be spaced at intervals to provide an uninterrupted supply of fresh bait.

**MICE:** Apply 1/4 to 1/2 ounce at 8- to 12-foot intervals. Large areas should be spaced at intervals to provide an uninterrupted supply of fresh bait for 15 days.

**RATS AND MICE:** Replace bait as needed. Collect and dispose of all dead rodents as soon as possible. If reinfestation occurs, Where a continuous source of permanent bait stations and re-

ACCEPTED with COMMENTS in EPA Letter Dated