7173-187 2/18/2004

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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

February 18, 2004

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

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Attention: Mr. Thomas J. Schmit

Ē	Maki Paraffinized Pellets EPA Reg. No. 7173-187 Your amended application of July 25, 2003
Purpose	The purpose of this submission is to revise your labels in accordance with PR Notices 93-3, 93-8, 97-5, 2001-1, and 2001-6.
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 changes, before you ship your product.
	1. Under "CAUTION", delete "or fatal". At the end of this section, add "If bait is handled, wear gloves".
	2. Under "Urban Areas" in the 2 <sup>nd</sup> Sentence, delete "and around".
Existing stocks	Stocks of existing labels may be used for eighteen (18) months.
Consequer for non- complianc	to cancellation in accordance with FIFRA section 6(e). Your release for

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- **Formatting** The Agency believes that the readability of the text could be improved if you changed the formatting of the label in certain areas:
  - 1. In your "FIRST AID" and "NOTE TO PHYSICIAN" sections, consider clarifying the distinctions between headings, subheadings, and text, as shown by Enclosures 1 and 2.
  - Under "STORAGE AND DISPOSAL", consider bolding and/or capitalizing "Storage", "Pesticide Disposal:", and "Container Disposal:" to clarify these subheadings and the accompanying texts, as LiphaTech had proposed on its last stamped, accepted labeling for this products on February 18, 1993.

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

Sincerely yours,

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

Enclosures

- 1. Current Format and Text for "FIRST AID" and "NOTE TO PHYSICIAN"
  - 2. Suggested Format and Text for "FIRST AID" and "NOTE TO PHYSICIAN"
  - 3. Stamped label for EPA Reg. No. 7173-187
  - 4. Minimum Type Size Requirements for Final Printed Labels

Letter Dan Peacock, Disk135,A:\Bromadiolone\7173-187, revised label, .wpd

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# Enclosure 1. Current Format and Text for "FIRST AID" and "NOTE TO PHYSICIAN"

**FIRST AID**: Have label with you when obtaining treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice.

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 immediately 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 immediately 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 immediately for treatment advice.

Note to Physician: If ingested, administer Vitamin  $K_1$  intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

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# Enclosure 2. Suggested Format and Text for "FIRST AID" and "NOTE TO PHYSICIAN"

FIRST AID Have label with you when obtaining treatment advice.				
If swallowed	<ul> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> </ul>			
If on skin or clothing	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center, or doctor immediately for treatment advice.</li> </ul>			
If inhaled	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor immediately for treatment advice.</li> </ul>			
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor immediately for treatment advice.</li> </ul>			
<b>NOTE TO PHYSICIAN</b> Bromadiolone may reduce the clotting time of the blood and cause				

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bleeding. If ingested, administer Vitamin  $K_1$  intramuscularly or orally. Repeat as necessary based on monitoring of prothrombin times.

## 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.

FIRST AID: Have this label with you when obtaining treatment advice. If swallowed: Call a poison control center or doctor immediately

for treatment advice. If in eves; Hold eve open and rinse slowly and gently with water

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Note to Physician: If ingested, administer Vitamin  $K_1$  intramuscularly or orally as indicated in bishydroxycournarin overdoses. Repeat as necessary based on monitoring of protorombin times

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildinfe. 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 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

tacility. active, Container Disposal: Dispose of empty container in a sanitary landhil, 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 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. 7173-187

ACCEPTER und up to 50 pounds EPA Est. No. 7173-WI-1 with COMMENTS & in EPA Letter Dated:

Alternate "Storage and Disposal" statement for packaging intended solely for household use:

STORAGE AND DISPOSAL

Under the Federal Insecticide

Furricide, and Rodenticide Act Storage: Store in original container in a dry piece amended, for the pesticide inaccessible to children and pess. Disposal: If empty: Do not reuse this container. Please in Stered under EPA Reg. No. trash or offer for recycling if available. If partly filled: Car your local solid waste agency or 1-800-CLEANUP for 7/73-/87

### Manufactured by Liphatech, inc. 3600 W. Elm Street Milwaukee, WI 53209

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MAKI

**Paraffinized Pellets** 

FOR INDOOR AND OUTDOOR

**URBAN RODENT CONTROL** 

KILLS NORWAY RATS, ROOF RATS, HOUSE MICE

AND WARFARIN-RESISTANT NORWAY RATS

NORWAY RATS & HOUSE MICE MAY CONSUME A LETHAL DOSE IN ONE NIGHT'S FEEDING

WITH FIRST DEAD RODENTS APPEARING

FOUR OR FIVE DAYS AFTER FEEDING BEGINS

Active ingredient: bromadiolone ...... 0.005%

**KEEP OUT OF REACH OF CHILDREN** 

CAUTION

See side panel for additional precautionary statements.

#### DIRECTIONS FOR USE

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

READ THIS LABEL: Read this entire label and follow all use directions and use 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. Apoly 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 by 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, or 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: For control of Norway Rats, Roof Rats and House Mice.

Urban Areas: This product may be used in and around the periphery of homes, industrial, commercial and public buildings. This product may also be used in and around transport vehicles (ships, trains, aircraft) and in related port or terminal buildings. This product may also be used in alleys. Non-Urban Areas: May be used inside of homes and agricultural buildings.

Do not place bait in areas where there is a possibility of contaminating lood or surfaces that come in direct contact with food. Do not broadcast bait.

SELECTION OF TREATMENT AREAS: Determine areas where rats or mice will most likely find and consume the balt. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their sions have been seen. Protect bait from rain or snow. Remove as much alternative lood as possible. APPLICATION DIRECTIONS

RATS: Apply 4 to 16 ounces of bait per placement. Placements usually should be spaced at intervals of 15 to 30 test. Maintain an uninterrupted supply of fresh bait for 10 days or until signs of rat activity cease.

MICE: Apply 1/4 to 1/2 ounce of bait per placement. Space Nines: Apply 14 to 12 out of the bar parents. Spear placements at 8 to 12 bot intervels. Larger placements (up to 2 ounces) may be needed at points of very high mouse activity. Maintain an uninterrupted supply of fresh bait for 15 days or until

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signs of mouse activity cesse. RATS AND MICE: Replace contaminated or spoiled bait immediately. Collect and signess of all dead animatia and leftover bait property. To prevent reinfestation, limit sources of rodent food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent beit stations and replenish bait as needed.

#### Alternate warranty statements:

inaccessible to children and pets.

any indoor or outdoor drain.

Satisfaction guaranteed or your money back.