

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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FEB 18 1993

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

Dear Mr. Smith:

Subject: MAKI RAT AND MOUSE BAIT PACKS (PELLETS)  
EPA Registration No. 7173-188  
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:
  - a. The "DIRECTIONS FOR USE" portions of the proposed revised labels for outer packages submitted on October 12, 1992, are generally 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."

The "DIRECTIONS FOR USE" portion of the label for the placepack itself is acceptable.

- b. Because six placepacks contain significantly less bait than would be needed for a single placement to control commensal rats at the maximum rate specified on the label, the label for the container of six placepacks must include the qualifying statement

"The placepacks in this bag contain enough bait (9 oz.) to kill three commensal rats."

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

This statement also should appear on the label for the container of eight placepacks. Place this statement as the third sentence in the "APPLICATION DIRECTIONS" subsection for "RATS."

- c. On the front panels, delete the comma between "KILLS" and "NORWAY RATS".
  - d. Under "CONTAINER DISPOSAL", change "Scurley" to "Securely" and "origibnal" to "original".
3. Submit one copy of final printed labeling before you release the product for shipment.

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

1. After reviewing the efficacy studies included with your submission of October 12, 1992, for 7173-187, we have decided to 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 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
- b. 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.

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. With

3.

our letter for 7173-187, we have provided 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.

2. You still have not indicated the exact composition of the bait used in the placepack penetration studies discussed in our letter of July 8, 1992.

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)

**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. 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 wrapper. Securely wrap original container in several layers of 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.

EPA REG. NO. 7173-188  
EPA EST. NO. 71 1-WI-1

# MAKI

## RAT AND MOUSE BAIT PACKS (PELLETS)

FOR INDOOR AND OUTDOOR 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%  
Total 100.000%

\*Bromadiolone-Supercid 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 (43 grams)

DIRECT

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

ADJ  
with C  
to EPA

FEB

Under the Federal  
Fungicide, and  
as amended, is  
registered under

7173-

**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. 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 pail. Rinse thoroughly before discarding 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.

EPA REG. NO. 7173-188  
EPA EST. NO. 7173-WI-1

**REGISTERED**  
**with COMMENTS**  
**in EPA Letter Dated:**

**FEB 18 1993**

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

7173-188

# MAKI

## RAT AND MOUSE BAIT PACKS (PELLETS)

FOR INDOOR AND OUTDOOR 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%
Total	100.000%

\*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: 4.69 lb (50 x 1.5 oz.)

**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.
2. Apply 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 a 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 hooled 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 related port or terminal buildings. This product may be used in alleys.

**NON URBAN AREAS:** This product may be used inside of homes and agricultural buildings.

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

**SELECTION OF TREATMENT AREAS:**

Determine areas where rats and/or mice will most likely find and consume the bait. 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 signs have been observed. Remove as much alternative food as possible.

**APPLICATION DIRECTIONS:**

**RATS:** Place at least 3 to 10 packs per placement. Maintain an uninterrupted supply of fresh bait for 10 days or until signs of rat activity cease.

**MICE:** Use one pack per bait placement. Space placements at 8- to 12-foot intervals. Maintain an uninterrupted supply of fresh bait for 15 days or until signs of mouse activity cease.

**RATS AND MICE:** Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and leftover bait properly. To prevent reinfestation, eliminate food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish bait as needed.