

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 17, 2006

$\frac{300}{1165}$ S-792101

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

Attention: Mr. Thomas J. Schmit

Subject: Maki Rat and Mouse Bait Packs (Pellets)
EPA Reg. No. 7173-188
Your amended application of March 21, 2006

- Purpose** The purpose of this submission is to revise your Confidential Statement of Formula (CSF) to show that you repackage another of your end-use, loose bait products as a source and to revise the labeling for this product.
- 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. Insert a space between "RODENTS" and "APPEARING" on the Front Panels of your labels.
- Existing stocks** Stocks of 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.

CSF Your revised CSF dated March 21, 2006, is acceptable, provided the place pack material used is identical to one in acceptable rat and mouse effectiveness tests for another of your products.

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

Sincerely yours,



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

Enclosure Stamped label

Letter Dan Peacock, Flash Drive, 256mb, J:\Bromadiolone\7173-188, revised label, 7-13-2006.doc

Outer Container Label

375

PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

CAUTION: Keep away from humans, domestic animals and pets. May be harmful 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 label with you when obtaining treatment advice.

If swallowed: 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 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.

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.

Note to Physician or Veterinarian: Contains bromadiolone, an anticoagulant. For humans or dogs that have ingested this product, or have obvious poisoning symptoms (bleeding) or prolonged prothrombin times, give Vitamin K₁ by intramuscular or oral administration. Check prothrombin time every 3 days or until values return to normal.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. 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 be disposed of on site or at an approved waste disposal facility.

Container Disposal: Offer empty container for recycling, or dispose of in a sanitary landfill, 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.

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

STORAGE AND DISPOSAL

Storage: Store in original container in a dry place inaccessible to children and pets.

Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Alternate warranty statements:

Satisfaction guaranteed or your money back.

MAKI RAT AND MOUSE BAIT PACKS (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%
Inert Ingredients 99.995%
Total 100.000%

EPA Reg. No. 7173-188 EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN CAUTION

See side panel for additional precautionary statements.

LIPHATECH

Manufactured By:
Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209

NET WEIGHT:

- 4.5 ounces (3 x 1.5 oz. bait packs), or
- 6 ounces (4 x 1.5 oz. bait packs), or
- 7.5 ounces (5 x 1.5 oz. bait packs), or
- 9 ounces (6 x 1.5 oz. bait packs), or
- 12 ounces (8 x 1.5 oz. bait packs), or
- 15 ounces (10 x 1.5 oz. bait packs), or

1 pound (10 x 1.5 oz. bait packs)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 17 2006

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

7173-188

DIRECTIONS FOR USE

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

READ THIS 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 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 hooled livestock, raccoons, bears, 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: This product may be used to control Norway rats, roof rats and house mice in the sites identified below. 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 in urban areas. This product may be used in and around homes, industrial, commercial and public buildings, food processing facilities, and similar man-made structures. This product may also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product may also be used in alleys. Non-urban areas: This product may only be used inside of homes and agricultural, industrial and commercial buildings.

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:

- (Qualifier statement for 3 x 1.5 oz. package only): The bait packs in this package contain enough bait (4.5 oz.) to kill one to four rats.
- (Qualifier statement for 4 x 1.5 oz. package only): The bait packs in this package contain enough bait (6 oz.) to kill one to five rats.
- (Qualifier statement for 5 x 1.5 oz. package only): The bait packs in this package contain enough bait (7.5 oz.) to kill two to seven rats.
- (Qualifier statement for 6 x 1.5 oz. package only): The bait packs in this package contain enough bait (9 oz.) to kill three to nine rats.
- (Qualifier statement for 8 x 1.5 oz. package only): The bait packs in this package contain enough bait (12 oz.) to kill three to twelve rats.
- (Qualifier statement for 10 x 1.5 oz. package only): The bait packs in this package contain enough bait (15 oz.) to kill four to fourteen rats.

Mice: Use one pack per bait placement. Space placements at intervals of 8 to 12 feet. Maintain an uninterrupted supply of fresh bait for at least 15 days or until there are no new signs of mouse activity.

Rats: Apply 3 to 10 packs per bait placement, usually spaced 15 to 30 feet apart. Maintain an uninterrupted supply of bait for at least 10 days or until there are no new signs of rat activity.

Follow-up: Replace contaminated or spoiled bait immediately. Collect and properly dispose of all dead animals and leftover bait, as well as any bait that has become accessible to non-target animals. To discourage reinfestation, limit sources of rodent food, water and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a permanent source of infestation is present, establish permanent bait stations and replenish bait as needed (07506)

Optional marketing statement:

Do not tear open the pack - rats and mice will chew through the wrapper to get at the bait.

"Mouse only" place pack label option: For retail sale as individual place packs, or in in outer package containing 1 or more place packs:

575

Optional marketing statements
Do not tear open the pack - mice will chew through the wrapper to get at the bait.

APPLICATION DIRECTIONS:
Mice: Use one pack per bait placement. Space placements at intervals of 8 to 12 feet. Maintain an uninterrupted supply of fresh bait for at least 15 days or until there are no new signs of mouse activity. Replace contaminated or spoiled bait immediately. Collect and properly dispose of all dead animals and leftover bait, as well as any bait that has become accessible to nontarget animals. To discourage reinfestation, use of rodent food, water and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a permanent source of infestation is present, establish permanent bait stations and replenish bait as needed. (07506)

STORAGE AND DISPOSAL: Storage: Store in original container in a cool, dry place inaccessible to children and pets. Dispose: If empty, do not reuse this container. Place in trash or offer for recycling if available. If partly filled, call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Manufactured by: Liphatech, Inc., 3600 W. Elm Street, Milwaukee, WI 53209

MAKI

MOUSE BAIT PACKS (PELLETS)

FOR INDOOR AND OUTDOOR URBAN RODENT CONTROL

KILLS HOUSE MICE

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%
Inert Ingredients:	99.995%
Total:	100.000%

EPA Reg. No. 7173-188 EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENTS: Hazard to Humans & Domestic Animals

CAUTION: Keep away from humans, domestic animals and pets. May be harmful 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 label with you when obtaining treatment advice.

If swallowed: 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 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.

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.

Note to Physician or Veterinarian: Contains bromadiolone, an anticoagulant. For humans or dogs that have ingested this product, or have obvious poisoning symptoms (bleeding) or prolonged prothrombin times, give Vitamin K₁ by intramuscular or oral administration. Check prothrombin time every 3 days or until values return to normal.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

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.

NET WEIGHT: 1.5 oz. (43 grams)

Alternate warranty statement: Satisfaction guaranteed or your money back.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. READ THIS 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 rodents 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 household vandals. 3. Dispose of product container, unused, spoiled and unconsumed bait as specified on this label.

USE RESTRICTIONS: This product may be used to control house mice in the sites identified below. 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. Urban areas: This product may be used in and around homes, industrial, commercial and public buildings, food processing facilities, and similar man-made structures. This product may also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. Non-urban areas: This product may only be used inside of homes and agricultural, industrial and commercial buildings.

SELECTION OF TREATMENT AREAS: Determine areas where 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, beneath floors and walls, or in locations where rodents or their signs have been observed. Remove as much alternative food as possible.

"Mouse only" outer carton label:

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

CAUTION: Keep away from humans, domestic animals and pets. May be harmful 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 label with you when obtaining treatment advice.

If swallowed: 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 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.

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

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

Dispose: If empty, do not reuse this container. Place in trash or offer for recycling if available. If partly filled, call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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.

Alternate warranty statement: Satisfaction guaranteed or your money back.

MAKI

MOUSE BAIT PACKS (PELLETS)

FOR INDOOR AND OUTDOOR URBAN RODENT CONTROL

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Active Ingredient: bromadiolone	0.005%
Inert Ingredients:	99.995%
Total:	100.000%

EPA Reg. No. 7173-188 EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panel for additional precautionary statements.

Manufactured By: Liphatech, Inc. 3600 W. Elm Street Milwaukee, WI 53209

NET WEIGHT: 1.5 oz. bait pack up to 50 pounds

DIRECTIONS FOR USE

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

READ THIS 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:

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APPLICATION DIRECTIONS:

Mice: Use one pack per bait placement. Space placements at intervals of 8 to 12 feet. Maintain an uninterrupted supply of fresh bait for at least 15 days or until there are no new signs of mouse activity. Replace contaminated or spoiled bait immediately. Collect and properly dispose of all dead animals and leftover bait, as well as any bait that has become accessible to nontarget animals. To discourage reinfestation, limit sources of rodent food, water and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a permanent source of infestation is present, establish permanent bait stations and replenish bait as needed. (07506)

Optional marketing statements:
Do not tear open the pack - mice will chew through the wrapper to get at the bait.