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 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 14 1995 184

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Edward F. Marshall  
 LiphaTech, Inc.  
 3101 West Custer Ave.  
 Milwaukee, WI 53209

Subject: Maki Paraffin Blocks  
 EPA Reg. No. 7173-189  
 Response to PR Notice 94-7  
 Resubmission of Amended Labeling Dated June 13, 1995

Dear Mr. Marshall,

We have reviewed the labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, and pursuant to PR Notice 94-7. The subject amended labeling is acceptable provided that you:

1. Amend the "DIRECTIONS FOR USE" section as indicated below.
  - a. The entire paragraphs entitled "URBAN AREAS" and "NONURBAN AREAS" must be indented at least two spaces so that it is clear to the reader that the headings of these paragraphs are subordinate to "USE RESTRICTIONS" and that the final paragraph of this section, which pertains to placement of bait, applies to all permissible urban and nonurban uses of this product.
  - b. Under "APPLICATION DIRECTIONS" for MICE, in the second sentence add the word "fresh" in between "until" and "signs" and add "to appear" at the end of the sentence.
  - c. Modify the "APPLICATION DIRECTIONS" for RATS as follows.
    - 1) In the second paragraph, the word "burrow" in the first sentence must be typed in bold to distinguish between directions for **burrow** applications and sewer applications (as specified below). In addition, a period must be added at the end of the last sentence of the second paragraph.

2) After the second paragraph, add the following paragraph of ~~CONCURRENCES~~ directions for sewer applications

SYMBOL	7505C	applications					
SURNAME	P. Perreault						
DATE	8/9/95						

P. Perreault C. LiphaTech 7173-189.Hr

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"For sewer applications, securely attach one end of a wire to a MAKI PARAFFIN BLOCK and the other end to a stationary structure such as the bottom step of a manhole ladder or to a sewer grate, allowing just enough wire for the block to rest on manhole benching. If benching is not present, suspend bait block a few inches above the high water line or place block on a board supported by opposing steps of the ladder. Securing MAKI PARAFFIN BLOCKS in this manner will minimize chances for removal by rats or water. Place at least one bait block per manhole."

2. Change the "ENVIRONMENTAL HAZARDS" statement to read

"This product is toxic to mammals and birds. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark."

3. Amend the "STORAGE AND DISPOSAL" statement as indicated below.

- a. If your product is intended for both commercial and household uses, change the "PESTICIDE DISPOSAL" and "CONTAINER DISPOSAL" directions to read

**"PESTICIDE DISPOSAL:**

**Commercial use:** Wastes resulting from the use of this product should be securely wrapped in several layers of newspaper and then disposed of onsite or at an approved waste disposal facility.

**Household use:** Securely wrap wastes resulting from the use of this product in several layers of newspaper and discard in trash."

**"CONTAINER DISPOSAL:**

**Commercial use:** Dispose of empty container in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Household use:** Do not reuse container. Wrap container securely in several layers of newspaper and discard in trash."

- b. If your product is intended either solely for commercial use or solely for household use, the label must only include the appropriate **commercial** or **household** disposal directions under "PESTICIDE DISPOSAL" and "CONTAINER DISPOSAL".
4. Submit one copy of your final printed labeling before you release the product for shipment. We caution you to refrain from adding any claims or directions to the final printed

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label that were not part of the stamped accepted label.

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 bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records. If you have any questions regarding this letter, please contact Peg Perreault at (703) 305-5412 or (703) 305-6600.

Sincerely yours,

RAF

Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

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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. Do not contaminate water by cleaning of equipment or disposal of wastes.

**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:** Securely wrap original container in several layers of newspaper and discard in trash.

**CONTAINER DISPOSAL:** Do not reuse empty container. Wrap container and put 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. 7173-189

EPA EST. NO. 7173-189 ACCEPTED with COMMENTS in EPA Letter Dated

AUG 14 1995

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 7173-189

**MAKI**

**PARAFFIN BLOCKS**

**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-Supercaid 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: 1 LB. (0.45 kg)

**DIRECT**

It is a violation of Federal law inconsistent with its labeling. **READ THIS LABEL:** Read directions and use precautions.

**IMPORTANT:** Do not expose animals to rodenticides. To help:

1. Store product not in use in a locked container.
2. Apply bait in locations out of reach of animals and nontarget wildlife. These stations must be placed in a manner that prevents such animals from reaching bait stations when they are lifted, otherwise immobilized. Even in areas open to hooved livestock, place bait stations in areas where potentially destructive animals are not likely to be present.
3. Dispose of product container, unopened bait as specified.

**USE RESTRICTIONS:**

For Control of Norway rats, roof rats and mice:

**URBAN AREAS:**

May be used in and around commercial and public building, transport vehicles (ships, trains, port or terminal buildings. May be used in sewers.

**NONURBAN AREAS:**

This product may be used in:

Do not place bait in areas where it may contaminate food or surfaces. Do not broadcast bait.

**SELECTION OF TREATMENT:**

Norway rats and/or mice will most often be found in wall burrows, in corners and concealed areas or in locations where rodents are not likely to be present. Bait from rain or snow. Re-treat as necessary.

**APPLICATION DIRECTIONS:**

Each MAKI PARAFFIN BLOCK should be broken into eight 2-oz pieces.

**MICE:** Break block and apply in small spaces. Space placements at intervals to insure uninterrupted supply of fresh bait until activity ceases.

**RATS:** Apply two to eight 2-oz pieces at each placement location. Space placements in infested areas. Maintain bait for 10 days or until fresh signs of activity are observed.

For burrow applications, insert bait into each active burrow. Check burrows evening to make sure that bait is being consumed.

**RATS/MICE:** Replace bait as needed. Collect and properly dispose of bait and any bait that has become stale. Prevent reinfestation, limit harborage as much as possible. Where a continuous treatment is required, establish permanent bait stations.