

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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743753

Attention: Mr. Thomas J. Schmit

**Subject: Maki Mini Blocks**  
**EPA Reg. No. 7173-202**  
**Your amended application of August 7, 2003**

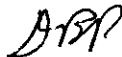
- Purpose** The purpose of this submission is to revise your labels in accordance with PR Notices 93-3, 93-8, 97-5, 2001-1, and 2001-6.
- Label** The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product.
1. Under "CAUTION", delete "or fatal".
  2. Under "Urban Areas" in the 2<sup>nd</sup> Sentence, delete "and around".
  3. On the Front Panel, change "Warfarin-Resistant House Mice" to Warfarin-Resistant Norway Rats".
- 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.

**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.
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 product on December 19, 2000.

**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](mailto:peacock,dan@epa.gov) (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. 7173-202
  4. Minimum Type Size Requirements for Final Printed Labels

**Letter** Dan Peacock, Disk135,A:\Bromadiolone\7173-202, revised label. .wpd

**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<sub>1</sub> intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

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

<b>FIRST AID</b>	
Have label with you when obtaining treatment advice.	
If swallowed	<ul style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <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 bleeding. If ingested, administer Vitamin K <sub>1</sub> intramuscularly or orally. Repeat as necessary based on monitoring of prothrombin times.	

**PRECAUTIONARY STATEMENTS**  
 Hazard to Humans and Domestic Animals  
**CAUTION:** Keep away from children, domestic animals and pets. May be harmful or fatal if swallowed or absorbed through the skin because it 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 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.  
 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.  
 Note to Physician or Veterinarian: If poisoning occurs, intramuscular and oral administration of Vitamin K<sub>1</sub> is antidotal as indicated in bishydroxycoumarin overdose. Repeated doses may be needed for up to two weeks (based on monitoring of prothrombin times). In severe cases, blood transfusions may be necessary.

**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: 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.

**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. 7173-202  
 EPA Est. No. 7173-WI-1

**LIPHA TECH**

Liphatech, Inc.  
 3600 W. Elm Street  
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Alternate "Storage and Disposal" statement for packaging intended solely for household use:

**STORAGE AND DISPOSAL:**  
 Storage: Store in original container in a cool, 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**

**MINI BLOCKS**

**KILLS NORWAY RATS,  
 ROOF RATS, HOUSE MICE AND  
 WARFARIN-RESISTANT HOUSE MICE**  
**NORWAY RATS AND HOUSE MICE CAN 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%

**KEEP OUT OF REACH OF CHILDREN  
 CAUTION**  
 See side panel for additional precautionary statements.

**Net Weight:**  
 4 ounces (4 x 1 ounce blocks)  
 5 ounces (5 x 1 ounce blocks)  
 6 ounces (6 x 1 ounce blocks)  
 8 ounces (8 x 1 ounce blocks)  
 10 ounces (10 x 1 ounce blocks)  
 12 ounces (12 x 1 ounce blocks)  
 or bulk package containing  
 1 pound up to 50 pounds

ACCEPTED  
 with COMMENTS  
 in EPA Letter Dated:

FEB 18 2004

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.  
 7173-202

**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 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, 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. 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; in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product may also be used in alleys. Do not use in sewers.

**Non-urban Areas:** This product may be used inside of homes and agricultural buildings.

**SELECTION OF TREATMENT AREAS:** Determine areas where rats or mice will most likely find and consume bait. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors or walls, or in locations where rodents or their signs have been seen. Remove as much alternative food as possible.

**APPLICATION DIRECTIONS:**

- (Qualifier statement only for package containing 4 blocks:) This package contains enough bait (4 oz.) to kill 1 to 3 rats.
- (Qualifier statement only for package containing 5 blocks:) This package contains enough bait (5 oz.) to kill 1 to 4 rats.
- (Qualifier statement only for package containing 6 blocks:) This package contains enough bait (6 oz.) to kill 2 to 6 rats.
- (Qualifier statement only for package containing 8 blocks:) This package contains enough bait (8 oz.) to kill 2 to 7 rats.
- (Qualifier statement only for package containing 10 blocks:) This package contains enough bait (10 oz.) to kill 3 to 9 rats.
- (Qualifier statement only for package containing 12 blocks:) This package contains enough bait (12 oz.) to kill 3 to 12 rats.

**Mice:** Apply one block per placement. 2 blocks may be needed at points of high mouse activity. Space placements 8 to 12 feet apart. Two blocks may be needed at points of very high mouse activity. Maintain a constant supply of fresh bait for 15 days or until fresh signs of mouse activity cease.

**Rats:** Apply 3 to 18 blocks per placement. Space placements 15 to 30 feet apart. Maintain a constant supply of fresh bait for 15 days or until fresh signs of rat activity cease.

**Follow-up:** Replace contaminated or spoiled bait immediately. Collect and dispose of all visible dead animals and leftover bait properly. To discourage reinfestation, limit sources of rodent food, water and harborage as much as possible. If reinfestation occurs, repeat treatment. For a continuous infestation, set up permanent bait stations and replenish bait as needed. (20203)

