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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

August 25, 2005

77 3374 R34/18

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

Attention: Mr. Thomas J. Schmit

Subject

Maki Mini Block

EPA Reg. No. 7173-202

Your amended application of January 21, 2005

Purpose

This application, under section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), submits data to support four (4) revised Confidential Statements of Formula (CSFs) and the addition of burrow and sewer uses to the labeling for this product.

Data Review

We have reviewed the data submitted to support the addition of the burrow and sewer uses to the labeling and to support the revised CSFs (1 basic and 3 alternatives) and found them to be acceptable. They are dated January 17, 2005. We have placed a copy of each CSFs in the files for this product. All other versions are obsolete.

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", at the end of this section, add "If bait is handled, wear gloves."
- 2. Under the sewer directions, change "sa few inches" to "a few inches".

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.

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Questions

If you have questions about this letter or the review, 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)

Enclosures

1. Stamped Label

Location

Dan Peacock, USB Flash Drive 1.1, F:\1-7-2005 Backup\Dan's Office Work\A Flash Drive 1\Bromadiolone\7173-202, add burrow and sewer use, 4 CSFs, 8-17-2005.wpd

PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. May be harmful 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.

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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 ingested, administer Vitamin K1 intramuscularly or orally as indicated in bistyldroxycournarin overdose. Repeat as necessary based on monitoring of prothrombin times.

Environmental Hazards: This product is toxic to fish and

Environmental Hazards: This product is toxic to fish and wildlife. Predatory and scavenging mammals and birds might be poisoned if they leed upon animals that have eaten the bait. 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

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Do not contaminate water, lood 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 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

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

LIPH/TECH

3600 W. Elm Street Milwaukee, WI 53209

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 evailable. 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,



MINI BLOCKS

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

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		<u>99,995%</u>
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 packet Entaining 1 pouled an in-public unds

AUG 2 5 2005

Under the Federal insecticide, Pungicide tot kodenticide Act as amended, to the pesticide registered under EPA Reg. No. 173-202

DIRECTIONS FOR USE

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

READ THIS LABEL and follow all use directions and use

MPORTANT: 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.

 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 a manner that prevents such children from reaching into bait compartments and obtaining bait. It 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 hooted tivestock, raccoons, bears, other potentially destructive arimats, or in areas prone to vandatism.

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 tood or surfaces that come in direct contact with lood. Do not broadcast bait.

proaccast pair. This product may be used in and around homes, lood processing facilities, industrial, commercial and public buildings; in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product may also he used in allower. be used in allevs.

Non-urban areas: This product may only 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 grawed 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 ball (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 bari (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 very high mouse activity. Space placements 8 to 12 feet apart. Maintain a constant supply of fresh bait for 15 days or until fresh signs of mouse activity cease.

Rate: Apply 3 to 16 blocks per placement. Space placements 15 to 30 feet apart. Maintain a constant supply of fresh bait for

15 to 30 feet apart. Maintain a constant suppry of restrictant for 10 days or until fresh signs of rat activity cease. For burrows, insert one or two blocks deep into each active burrow. Check treated burrows each morning and evening to make sure that bait has not been pushed out of burrows.

make sure mat bait has not been pushed out of burrows. For sewer applications, run a wire through the holes in the bait blocks and attach the wire to a stationary structure such as the bottom step of a manhole ladder or to a sewer grate, allowing just enough wire for the blocks to rest on manhole benching, it benching is not present, suspend bait block \$375w inches above the high water line or place blocks on a board supported by opposing steps of the ladder. Securing blocks in this manner will maintize chances for removal by rats or water. Place at least 12 bait blocks one manhole.

Fallow-up: Replace contaminated or spoiled bait immediately. Follow-up: Replace contaminated or spoiled bait immediately. Coffect and dispose of all visible dead animals and lettover bait properly. To discourage reintestation, limit sources of rodent lood, 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.