

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 30, 2003

Lipha Tech, Inc.
3600 West Elm Street
Milwaukee, WI 53209

305-5606502
18

Attention: Mr. Thomas Schmidt

Subject: Pellets Generation
EPA Reg. No. 7173-205
Amendment dated November 1, 2001, adding optional marketing, allowing 12 ounce to bulk packaging, and updating per PR Notices 93-3, 93-8, 97-5, 2001-1, and 2001-6.

The submission referred to above, submitted for registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following comments:

**Label
Comments**

1. Change the modified "single-feeding" claim on the center panel of the label to read as follows:

**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.**

2. Change the opening phrase of the "USE RESTRICTIONS:" subsection to the following complete sentence:

**This product may be used to control Norway rats,
roof rats, and house mice.**

3. In the "URBAN AREAS:" paragraph, revise as follows:

May be used indoors and in transport vehicles (ships, trains, aircraft). May only be used outdoors within 15 ft of homes, industrial, commercial, agricultural, and public buildings and similar manmade structures.

and in the "NON-URBAN AREAS:"

This product may only be used inside of homes and agricultural buildings.

**Label
Comments
(Cont.)**

4. The qualifying statement proposed for use (under "APPLICATION DIRECTIONS:") on the package containing 12 ounces only, the package should state for **RATS**: Use 3 to 12 ounces of bait per placement

5. Delete the "Optional marketing" claim:

D-Con: Solving America's rodent problems for over 50 years.

This misleading statement has no relevance to a LiphaTech product or to a Difethialone product. Products containing that chemical first were registered as pesticides in the U.S. on May 3, 1995, less than 7 years ago. If the registrant of the d-Con line of rodenticides were listed as a distributor for this product, the claim still would not be acceptable for 7173-205.

and: **Rodent control for in and around your home.**

These claims may not be used. Difethialone products may only be used "around homes" when the "homes" are in "URBAN AREAS". In "NON-URBAN AREAS", such products may only be used "inside of homes and agricultural buildings".

6. Revise the "Optional marketing statement":

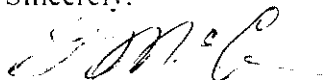
Helps protect your family from rodents which can carry diseases (into your home).

to:

Helps protect your family from rodents which can carry diseases.

Questions: If you have any questions or comments about this letter, please contact me at 703-605-0716 (by phone), 703-305-6596 (by fax), or mccann.geri@epa.gov (by E-Mail).

Sincerely,



Geraldine R. McCann
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure: Stamped label

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals
WARNING: 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. Causes substantial but temporary eye injury. Do not get in eyes, on skin or on clothing. Wear safety glasses. Wash arms, hands and face with soap and water after applying and before eating and smoking.

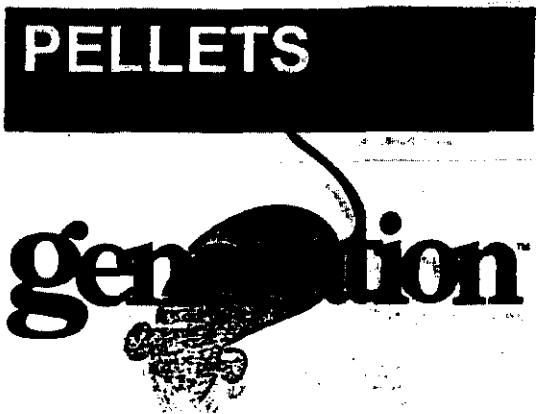
FIRST AID
 Have this label with you when obtaining treatment advice.
 If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
 If Swallowed: Call a poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to do so by the poison control center or doctor. Note to Physician or Veterinarian: This product may reduce the clotting ability of the blood and cause hemorrhaging. If poisoning occurs, intramuscular and oral administration of Vitamin K₁ is antidotal as indicated in bihydroxycoumarin overdoses. 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.

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. 7173-205 Product No.
 EPA Est. No. 7173-WI-1 Label No.

LIPHATECH
 Manufactured By:
 LIPHATECH, INC.
 3101 W. Custer Avenue
 Milwaukee, WI 53209



PELLETS

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

**NORWAY RATS AND HOUSE MICE CAN
 CONSUME A LETHAL DOSE IN ONE FEEDING
 WITH FIRST DEAD RODENTS APPEARING
 FOUR OR FIVE DAYS AFTER TREATMENT BEGINS**

Active Ingredient: difethalione* 0.0025%
 Inert Ingredients 99.9975%
 Total 100.0000%

*Patented in the U.S.A.

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

**Net Weight: 12 ounces
 or
 1 pound up to 50 pounds
 ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 OCT 30 2003
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
 7173-205**

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.

Optional marketing statements:

D-Con: Solving America's rodent problems for over 50 years. Rodent control for in and around your home. Helps protect your family from rodents which can carry diseases (into your home). Dead mice 4 to 5 days after they eat the bait.

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 filled, 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 vandals.
 3. Dispose of product container, unused, spoiled, and unincurred bait as specified on this label.

Use Restrictions: For control of 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.
URBAN AREAS: This product may be used in and around homes, and industrial, commercial and public buildings. May be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. Applications "around" buildings must be made in tamper-resistant bait stations placed along the walls or other external parts of buildings (e.g., doorways, ramps, loading docks) where rats or mice might seek entrance.
NON-URBAN AREAS: 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 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 for package containing 12 ounces only.) This package contains enough bait (12 oz.) to kill three to ten rats.
Rats: Use 3 to 16 ounces of bait per placement. Space placements at 15 to 30 foot intervals. Maintain a constant supply of fresh bait for 10 days or until signs of rat activity cease.
Mice: Use 1/4 to 1/2 ounce of bait per placement. Larger amounts (up to 2 ounces) may be placed at points of very high mouse activity. Space placements at 8 to 12 foot intervals. Maintain a constant 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 visible dead animals and leftover bait properly. To prevent 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.

Alternate warranty statements:

Satisfaction guaranteed or your money back.