

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 16, 2007

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

Attention: Rachel M. Callies

Subject **Generation Pellets**
EPA Reg. No. 7173-205
Amendment to update the label signal word, add burrow claims, and size options, and expand the CSF.

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

CSF

Comments

The Basic Confidential Statement of Formulation dated 20 September, 2006, is acceptable and replaces all other Basic CSFs in the file.

The 4 Alternate Formulations dated 20 September, 2006, are also acceptable. Please label Alternate Formulations with A, B, C, and D when submitting more than one.

Label

Comments

The label for 7173-205 (dated with pin punch September 25, 2006) is acceptable.

The signal word change to "CAUTION" is supported by MRID 46206001.

The amendment form states "adds 8 and 10 ounce block options" to the label for 7173-205. The 8 and 10 ounce sized pellet packages are acceptable, but 8 and 10 ounce blocks are another product.

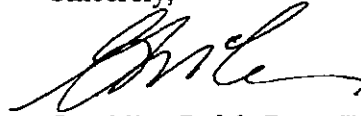
The weathered bait studies MRID #s 46940404 and 46940405 (LTI #s 06041 and 06042) support burrow use on the label.

Revise the Warranty statement to read: "To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning..."

Questions

If you have any questions or comments about this letter, please contact me at 703-605-0716 (by phone), 703-305-6920 (by fax), or mccann,geri@epa.gov (by E-Mail).

Sincerely,



Geraldine R. McCann, Biologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

Stamped Label

domestic animals and pets. If swallowed this product reduces the clotting ability of blood and causes bleeding. Avoid contact with eyes, skin or clothing. Wear gloves when handling bait or dead animals. 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. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

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: Contains difethialone, 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 until values return to normal.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Predatory and scavenging mammals and birds might be poisoned if they feed 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

Do not contaminate water, food or feed by storage or disposal. This is a nonrefillable container.

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: Do not reuse or refill this container. Offer for recycling if available or dispose of empty container in a sanitary landfill, 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.

Product No. Label No.



**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: difethialone | 0.0025% |
| Inert Ingredients | 99.9975% |
| Total | 100.0000% |

EPA Reg. No. 7173-205

EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN

CAUTION:

See side panel for additional precautionary statements.

LIPHA/TECH

Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209
(414) 351-1476

Net Weight:

8 ounces, or 10 ounces, or 12 ounces, or
1 pound, up to 50 pounds

ACCEPTED
with COMMENTS
EPA Letter Dated
FEB. 16, 2007
The Federal Insecticide,
Fungicide, and Rodenticide Act,
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

This is a nonrefillable container.
Storage: Store in original container in a dry place inaccessible to children and pets.
Disposal: If empty: Do not reuse or refill 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.

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 near or inside ventilation duct openings. Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment. Do not broadcast bait.

Urban Areas: May be used indoors and in transport vehicles (ships, trains, aircraft). May be used outdoors within 15 feet of homes, food processing facilities, industrial, commercial, agricultural and public buildings, and similar manmade structures.

Non-urban Areas: May only be used inside of homes, agricultural, industrial and commercial buildings.

Selection of Treatment Areas: Determine areas where rats and/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 observed. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

(Qualifier statement for package containing 8 ounces of bait only.)

This package contains enough bait (8 oz.) to kill two to seven rats.

(Qualifier statement for package containing 10 ounces of bait only.)

This package contains enough bait (10 oz.) to kill three to nine rats.

(Qualifier statement for package containing 12 ounces of bait only.)

This package contains enough bait (12 oz.) to kill three to twelve rats.

Mice: Apply 1/4 to 1/2 ounce of bait (1-2 level tablespoons) per placement, usually spaced 8 to 12 feet apart. Larger amounts (up to 2 ounces) may be placed at points of very high mouse activity. Maintain a constant supply of fresh bait for at least 15 days or until signs of mouse activity cease.

Rats: Apply 4 to 16 ounces of bait per placement, usually spaced 15 to 30 feet apart. Maintain a constant supply of fresh bait for at least 10 days or until signs of rat activity cease.

For rat burrows, insert 1 to 2 ounces of bait deep into each active burrow. Check treated burrows each morning and evening to make sure that bait has not been pushed out of burrows.

Follow-up: Replace contaminated or spoiled bait immediately. Collect and dispose of all visible 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 occurs, repeat treatment. Where a permanent source of infestation is present, set up permanent bait stations and replenish bait as needed. (26306)