

7173-205

7/27/2012

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms. Michele Brunlinger
Liphatech, Inc.
3600 West Elm St.
Milwaukee, WI 53209

JUL 27 2012

Dear Ms. Brunlinger:

Subject: Label Revisions to Reflect New Label Perimeter Restriction of 100 Feet
and Burrow Baiting Language
Generation Pellets
EPA Registration No. 7173-205

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment.

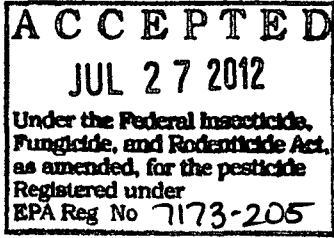
Note: Should you wish to add a reference to the company's website on your label, please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, **regardless of whether a website is referenced on your product's label**, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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. If you have questions about this letter, please contact Jennifer Gaines at (703) 305-5967 or via e-mail at gaines.jennifer@epa.gov.

Sincerely yours,

John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

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PCO Use Label, Center/Front Panel

Generation Pellets

OPTIONAL [ALL WEATHER BAIT FOR WET OR DRY AREAS]

FOR INDOOR AND OUTDOOR USE

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

NORWAY RATS AND HOUSE MICE MAY 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	<u>99 9975%</u>
Total	100 0000%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [side][back][inner][outer] [panel][carton][label] for additional precautionary statements

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

Net Weight
16 lbs up to 2000 lbs

Statement required on label of inner packages holding less than 16 pounds of bait
It is illegal to sell this product in individual containers holding less than 16 pounds of bait

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

CAUTION Harmful if swallowed or absorbed through the skin Causes moderate eye irritation Avoid contact with eyes, skin or clothing Keep away from children, domestic animals and pets All handlers (including applicators) must wear long sleeved shirt, long pants, shoes, socks, and waterproof gloves Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves

User Safety Requirements Follow manufacturer's instructions for cleaning/maintaining PPE If no such instructions for washables, use detergent and hot water Keep and wash PPE separately from other laundry Remove PPE immediately after handling this product Wash the outside of gloves before removing As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing

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

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

TREATMENT FOR PET POISONING If animal eats bait, call veterinarian at once

NOTE TO PHYSICIAN OR VETERINARIAN Contains the anticoagulant difethialone If swallowed, this material may reduce the clotting ability of blood and cause bleeding For humans or animals ingesting bait and/or showing obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K₁ intramuscularly or orally Also for pets if needed, check prothrombin time every 3 days until values return to normal (up to 30 days) In severe cases blood transfusions may be needed

ENVIRONMENTAL HAZARDS This product is extremely toxic to mammals and birds Dogs cats and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this 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 Do not contaminate water when disposing of equipment wash water or rinsate

STORAGE AND DISPOSAL Do not contaminate water, food or feed by storage or disposal

Pesticide 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 in trash or at an approved waste disposal facility

Container Handling Nonrefillable container Do not reuse or refill this container **[Plastic]** Completely empty container, then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill **[Paper]** Completely empty container, then dispose of empty container in trash or at an approved waste disposal facility

WARRANTY To the extent consistent with applicable law, 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

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PCO Use Label side/back/inner panel

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 precautions Use only for the sites, pests, and application methods described on this label

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 hooved 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

Note Bait stations are mandatory for outdoor, above ground use Tamper resistant bait stations must be used if children, pets, non target mammals, or birds may access the bait

USE RESTRICTIONS This product can only be used to control Norway rats, roof rats and house mice in and within 100 feet of man made structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations Examples of such structures include homes and other permanent or temporary residences, food processing facilities, industrial and commercial buildings trash receptacles, agricultural and public buildings, transport vehicles (ships, trains, aircraft), docks and port or terminal buildings, and related structures around and associated with these sites Fence and perimeter baiting beyond 100 feet from a structure, as defined above, is prohibited Do not sell this product in individual containers holding less than 16 pounds of bait 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 apply directly to food or feed crops Do not broadcast bait

Selection of Treatment Areas Determine areas where rats and/or house 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 in or beside burrows, or in locations where rats and/or house mice or their signs have been observed Remove as much alternative food as possible

APPLICATION DIRECTIONS

House Mice Apply 1/4 to 1/2 ounces per placement, usually spaced 8 to 12 feet apart Up to 2 ounces may be needed at points of very high house mouse activity Maintain a constant supply of fresh bait for 15 days or until signs of house mouse activity cease

Rats Apply 4 to 16 ounces per placement, usually spaced 15 to 30 feet apart Maintain a constant supply of fresh bait for 10 days or until signs of rat activity cease This product may only be applied to active rodent burrows to control Norway rats and roof rats within 100 feet of buildings and man made structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations provided that infestations of these rodents have been confirmed Efforts should be made to remove food trash, garbage, clutter and debris Bait must be placed no less than 6 inches into active Norway/roof rat burrows Do not broadcast bait

Follow up Replace contaminated or spoiled bait immediately Wearing waterproof gloves, collect and dispose of all visible dead animals and leftover bait, as well as any bait that has become accessible to non target animals To discourage reinfestation, limit sources of rodent food, water and harborage as much as possible If reinfestation does occur, repeat treatment For a continuous infestation, set up permanent bait stations and replenish bait as needed

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EPA Est No 7173 WI 1

Product No
Label No

Optional Statements

Satisfaction guaranteed or your money back

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Agricultural Label, Center/Front Panel

Generation Pellets

OPTIONAL [ALL WEATHER BAIT FOR WET OR DRY AREAS]

FOR INDOOR AND OUTDOOR USE

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

NORWAY RATS AND HOUSE MICE MAY CONSUME A LETHAL DOSE IN ONE NIGHT'S FEEDING WITH FIRST DEAD RODENTS APPEARING FOUR OR FIVE DAYS AFTER FEEDING BEGINS

Active Ingredient difethalone	0 0025%
Inert Ingredients	<u>99 9975%</u>
Total	100 0000%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [side][back][inner][outer] [panel][carton][label] for additional precautionary statements

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

Net Weight
8 pounds up to 2000 pounds

Statement required on label of inner packages holding less than 8 pounds of bait
It is illegal to sell this product in individual containers holding less than 8 pounds of bait

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

CAUTION Harmful if swallowed or absorbed through the skin Causes moderate eye irritation Avoid contact with eyes, skin or clothing Keep away from children, domestic animals and pets All handlers (including applicators) must wear long sleeved shirt, long pants, shoes, socks, and waterproof gloves Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves

User Safety Requirements Follow manufacturer's instructions for cleaning/maintaining PPE If no such instructions for washables, use detergent and hot water Keep and wash PPE separately from other laundry Remove PPE immediately after handling this product Wash the outside of gloves before removing As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet, and change into clean clothing

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

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

TREATMENT FOR PET POISONING If animal eats bait, call veterinarian at once

NOTE TO PHYSICIAN OR VETERINARIAN Contains the anticoagulant difethialone If swallowed, this material may reduce the clotting ability of blood and cause bleeding For humans or animals ingesting bait and/or showing obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K₁ intramuscularly or orally Also for pets, if needed, check prothrombin time every 3 days until values return to normal (up to 30 days) In severe cases, blood transfusions may be needed

ENVIRONMENTAL HAZARDS This product is extremely toxic to mammals and birds Dogs, cats and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this 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 Do not contaminate water when disposing of equipment wash water or rinsate

STORAGE AND DISPOSAL Do not contaminate water, food or feed by storage or disposal

Pesticide 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 in trash or at an approved waste disposal facility

Container Handling Nonrefillable container Do not reuse or refill this container **[Plastic]** Completely empty container then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill **[Paper]** Completely empty container, then dispose of empty container in trash or at an approved waste disposal facility

WARRANTY To the extent consistent with applicable law, 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

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DIRECTIONS FOR USE

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READ THIS LABEL and follow all use directions and precautions Use only for the sites, pests, and application methods described on this label

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

Note Bait stations are mandatory for outdoor, above ground use Tamper resistant bait stations must be used if children, pets, non target mammals, or birds may access the bait

USE RESTRICTIONS This product can only be used to control Norway rats, roof rats and house mice in and within 100 feet of agricultural buildings and man made agricultural structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations Fence and perimeter baiting, beyond 100 feet from an agricultural structure as defined above, is prohibited Do not sell this product in individual containers holding less than 8 pounds of bait 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 apply directly to food or feed crops Do not broadcast bait

Selection of Treatment Areas Determine areas where rats and/or house 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, in or beside burrows, or in locations where rats and/or house mice or their signs have been observed Remove as much alternative food as possible

APPLICATION DIRECTIONS

House Mice Apply ¼ to ½ ounce per placement, usually spaced 8 to 12 feet apart Up to 2 ounces may be needed at points of very high house mouse activity Maintain a constant supply of fresh bait for 15 days or until signs of house mouse activity cease

Rats Apply 4 to 16 ounces per placement, usually spaced 15 to 30 feet apart Maintain a constant supply of fresh bait for 10 days or until signs of rat activity cease This product may only be applied to active rodent burrows to control Norway rats and roof rats within 100 feet of buildings and man made structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations provided that infestations of these rodents have been confirmed Efforts should be made to remove food trash, garbage, clutter and debris Bait must be placed no less than 6 inches into active Norway/roof rat burrows Do not broadcast bait

Follow up Replace contaminated or spoiled bait immediately Wearing waterproof gloves, collect and dispose of all visible dead animals and leftover bait, as well as any bait that has become accessible to non target animals To discourage reinfestation, limit sources of rodent food, water and harborage as much as possible If reinfestation does occur, repeat treatment For a continuous infestation, set up permanent bait stations and replenish bait as needed

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Product No
Label No

Optional Statements

Satisfaction guaranteed or your money back