



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 24, 2015

Thomas Schmit
Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209

Subject: Label Amendment – Adding additional target pests
Product Name: Generation Pellets
EPA Registration Number: 7173-205
Application Date: June 29, 2015
Decision Number: 507052

Dear Mr. Schmit:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then 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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Jessica Rogala by phone at 703-347-0263, or via email at rogala.jessica@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'MS', with a long horizontal stroke extending to the right.

Mark Suarez
Product Manager 07
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

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

*(Optional when other species are listed as target species on label directions:
KILLS OTHER RODENT SPECIES AS LISTED ON THIS LABEL)*

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 | 99.9975% |
| Total | 100.0000% |

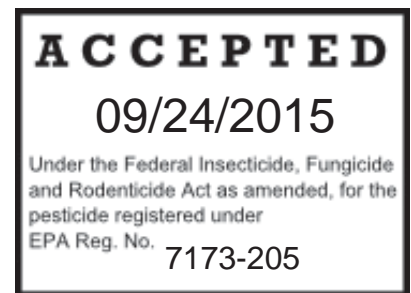
KEEP OUT OF REACH OF CHILDREN

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.

PCO Use Label, side/back/inner panel:

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 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.

Optional Statements:

Satisfaction guaranteed or your money back.

EPA Reg. No. 7173-205

EPA Est. No. 7173-WI-1

Product No.:

Label No:

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

(Optional species and restriction that may be listed on label as target pests:)

| | |
|----------------------------------------------------------|------------------------------------------------------|
| Cotton rat* (<i>Sigmodon hispidus</i>) | Meadow vole* (<i>Microtus pennsylvanicus</i>) |
| Eastern harvest mouse* (<i>Reithrodontomys humuli</i>) | White-throated woodrat* (<i>Neotoma albigula</i>) |
| Golden mouse* (<i>Ochrotomys nuttalli</i>) | Southern plains woodrat* (<i>Neotoma micropus</i>) |
| Polynesian rat* (<i>Rattus exulans</i>) | Mexican woodrat* (<i>Neotoma mexicana</i>) |

*Not permitted for use against the following species in California: Cotton rat, Eastern harvest mouse, Golden mouse, Polynesian rat, Meadow vole, White-throated woodrat, Southern plains woodrat, and Mexican woodrat.

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.

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
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| | |
|-------------------------------------------|-----------------|
| 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:
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.*

Agricultural Label, side/back/inner panel:

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 pants, shoes, socks, and waterproof gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves.

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Golden mouse* (*Ochrotomys nuttalli*)

Southern plains woodrat* (*Neotoma micropus*)

Polynesian rat* (*Rattus exulans*)

Mexican woodrat* (*Neotoma mexicana*)

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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.

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