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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

May 28, 2003

300 17 5-631763

LiphaTech 3600West Elm Street Milwaukee, WI 53209

Attention: Mr. Thomas Schmit

Subject: Generation Pellets Placepacks

EPA Reg. No. 7173-206

Revised Label

Your amended application of February 17, 2003

Purpose

The purpose of this submission under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is to revise your label according to PR Notices 93-3, 93-8, 97-5, 2001-1, and 2001-6, to revise the use directions, and to add more package sizes/configurations, with "size-specific qualifier statements".

Label review

The label submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided that you make the following changes and submit one (1) copy of final printed labeling, including graphics, to us before you release product for shipment. A copy of the stamped label is enclosed for your records.

- 1. Left justify and bold the subheading, "Hazard to Humans and Domestic Animals".
- 2. Center and bold the main heading, "Note to Physician or Veterinarian".
- 3. Revise your "FIRST AID", as follows:

FIRST AID

Have label when obtaining treatment advice. **If swallowed:** Call a poison control center, doctor, or 1-800-351-1476 immediately for treatment advice ... person.

The above presentation will be clearer and use less space.

Page 2 of 2

Label reviewcontinued

- 4. Bold "Storage", "Disposal", "If empty", and "If partly filled" to highlight headings.
- 5. Indent and bold "URBAN AREAS:" AND "NON-URBAN AREAS:".
- 6. On your Placepack Labels, revise your "FIRST AID" text as follows:

FIRST AID: Have label when obtaining treatment advice. If swallowed: Call a poison control center, doctor, or 1-800-351-1476 immediately for treatment advice ... person.

On a label where space is limited, the above presentation will be clearer and use less space.

- 7. Bold "Storage", "Container Disposal", "Pesticide Disposal", "Disposal", "If empty", and "If partly filled", wherever they appear in your label to highlight headings and subheadings.
- 8. On the "Mouse Only" "Outer Label" and "Placepack Label", change "RODENTS" to "MICE" in the single feeding claim.

Existing stocks

Stocks of existing labels may be used for eighteen (18) months.

Consequen ce for noncompliance

If these conditions are not complied with, the registrations will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Questions

If you have questions about this letter, 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)

Letter location Disk 105,C:\Disk 105\Difethialone\7173-206, revised label, 5-25-2003.wpd, May 25, 2003

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. May be harmful or latal if swallowed or absorbed through the skin because it may reduce the clotting abitity of blood and cause bleeding. Do not get in eyes, on skin or on clothing, Wash arms, hands and lace with scap and water r applying and before eating and smoking.

FIRST AID: Have this label with you when obtaining treatment advice. You may also call 1-800-351-1476 for emergency medical treatment information.

medical treatment information.

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 so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

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 lowered 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. 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.

naccessure to chibren 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

Product No.

Label No.

ACCEPTED with COMMENTS? in EPA Letter Dated

MAY 2 8 2003

LIPH/TECH

3600 W. Elm Street Milwaukee, WI 53209 (800) 351-1476

NET WEIGHT:

Under the Federal Inserticide, 3 ounces (2 x 1.5 ounce bait packs) Fungicide, and Rodenticide Ad.5 ounces (3 x 1.5 ounce bait packs) as amended for the pesticide ounces (4 x 1.5 ounce bait packs) registered trusier EPA Reg. No. 7.5 ounces (5 x 1.5 ounce bait packs) 9 ounces (6 x 1.5 ounce bait packs) 12 ounces (8 x 1.5 ounce bait packs) 15 ounces (10 x 1.5 ounce bait packs) or bulk packaging containing 16.5 ounces (11 x 1.5 ounce bait packs) up to

50 pounds (approx. 533 bait packs)

PELLETS PLACEPACKS

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 9	
Total	0.0000%

KEEP OUT OF REACH OF CHILDREN CAUTION: See side panel for additional precautionary statements.

EPA Reg. No. 7173-206

EPA Est. No. 7173-WI-1

DIRECTIONS FOR USE

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

READTHIS 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 focation out of reach of children and

pets. 2. Apply ball in locations out of reach of children, pets, domestic animals, and nontarget wildlife, or in tamper-resistant ball 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 previous such children from reaching into balt compartments and obtaining ball. If ball can be shaken from stations when they are little, units must be secured or otherwise immobilized. Even stronger ball stations are needed in areas open to hooked livestock, recoons, bears, other motentially destructive angies or in areas prone to vendeliem.

potentially destructive animals, or in areas prone to vanda
3. Dispose of product contained Dispose of product container, unused, spoiled, and unconsumed bait as specified on this label.

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 food or surfaces that come in direct contact with food.

URBAN AREAS: This product may only be used in and around homes, and industrial, commercial and public buildings. This product may also 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, bacting docks) where rats or mice might seek to gain entrance.

NON-URBAN AREAS: In non-urban areas, this product may only be used insade of homes and agricultural buildings. used inside of homes and agricultural buildings.

SELECTION OF TREATMENT AREAS: Determine areas where rate SELECTION OF INCATIMENT AREAS: Determine areas where rats or mica will most likely find and consume bair. Generally, these are along walls, by gnawed openings, in comers and concealed places, between floors or walls, or in locations where rodents or their signs have been seen. Plemove as much alternative food as possible.

APPLICATION DIRECTIONS:

(Qualifier statement for package containing 2 bait packs only:) This package contains enough bait (3 oz.) to kill one rat. (Qualifier statement for package containing 3 bait packs only.) This package contains enough bait (4.5 oz.) to kill one to three rats. (Qualifier statement for package containing 4 bait packs only.) This package contains enough bait (6 oz.) to kill two to six rats (Qualifier statement for package containing 5 bait packs only.)
This package contains enough bait (7.5 oz.) to kill two to seven rats. (Qualifier statement for package containing 6 bait packs only.)
This package contains enough bait (9 oz.) to kill three to nine rats. (Qualifier statement for package containing 8 baif packs only.)
This package contains enough baif (12 oz.) to kill four to ten rats (Qualifier statement for package containing 10 bail packs only.)
This package contains enough bail (15 oz.) to kill five to twelve rats. Rate: Use 2 to 10 packs per placement. Space placements at 15 to 30 toot intervals. Maintain a constant supply of tresh bait for 10 days or until signs of rat activity cease.

Mice: Use one pack per placement. 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.

signs of mouse activity cease.

Follow-up: Replace contaminated or spoiled bait immediately.

Collect and dispose of all visible dead animals and leftover bait properly. To discourage reintestation, simit sources of rodent bood, 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 "Storage and Disposal" statement for packaging intended solely for household use:

STORAGE AND DISPOSAL

Storage: Store in original container in a 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.

Alternate warranty statements:

Satisfaction guaranteed or your money back.



Page 1 of 3, Product label for EPA Reg. No. 7173-206 Submitted February 17, 2003

"Full label" place pack label option: For retail sale in outer package containing 2 or more place packs, with size-specific qualifier statements on outer package label:

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Follow-up: Referse contaminated or spinish and and a spinish case.

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generation

PELLETS PLACEPACKS

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

Patented in the USA

EPA Reg. No. 7173-206

EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENTS: Hazard to Humans & Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. May be harmful or fatal if swafowed 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.

FIRST AID: Have this tabel with you when obtaining treatment advice. You may also call 1-800-351-1476 for emergency medical treatment information.

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. Note to Physician or Veterinarian: Contains diffethialone, an anticoagulant. For humans or dogs that have ingested this product, or have obvious poisoning symptoms (bleding) or lowered 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. Do not apply

WARRANTY: Seller makes no warranty, expressed or implied, concerning use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of product when such use and/or handling is contrary to label instructions.

NET WEIGHT: 1.5 oz. (43 grams)

Alternate warranty statement: Satisfaction guaranteed or your money back.

er or doctor immediately for treatment advice. Have person sip a factor comfart unterst told to do so by the poison comfort center. It do an unconscious person. It as a unconscious person. It as a unconscious person. It as a unconscious person and a support of the It as a unconscious person and It as a unconscious person and It as a unconscious a unconscious and It as a unconscious It a

"Abbreviated" place pack label option: For retail or commercial sale in outer package containing 2 or more place packs, with size-specific qualifier statements on outer package label:

abel 115-3625-0702

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

| Inert Ingredients: 99.9975% | Total: 99.9000% | 100.0000%

*Patented in the USA EPA Reg. No. 7173-206

EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN

CAUTION: See side panel for additional precautionary statements.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read the entire label on the outer package before using this product. It is illegal to sell these placepacks individually.

LIPH/TECH* Milwaukee, WI 53209 (800) 351-1476

3600 W. Elm Street

NET WEIGHT: 1.5 oz. (43 grams)

SACTION.* Keep away from children. Comestic animals and pets. I seedlewed or absorbed through the skin because it may reduce the children because it may reduce the children after applying and before eating and smithing. Wash arms, hands and later applying and before eating and smoking breathers to the state of the seed of the state with you when obtaining breatherst down to the seed of the seed of the seed of the state of the seed of

STORAGE AND DISPOSAL

Storage: Store in original container in a dry place inaccessible to Storage: Store in original container in a 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 look old waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain. Page 2 of 3, Product label for EPA Reg. No. 7173-206 Submitted February 17, 2003

Alternate "Storage and Disposal" statement for packaging intended solely for household use:

Alternate warranty statement: Satisfaction guaranteed or your money back.

"Mouse only" place pack label option: For retail sale as individual place packs, or in in outer package containing 1 or more place packs:

> **UPC** (for position only

station bail as 351-1476 Storage: Store in original contrainer in a dry place inaccessible. Do not reuse this contraine. Place in Insist or offer for recycling cal solid waste agency or I-800-CLEANUP for disposal instruction motor or outdoor drain. Chace placements at 8 to 12 foo so fmouse activity cease. Replace co we dead animats and efflorer ball pix in harboraça as much as possible. If in to permanent ball stations and replen to permanent ball stations and replen (800) 53209 ₹ Street, Milwaukee, ᇤ 3600 W. STORAGE / children and pet available. If par bail in the constant of the co iphatech.

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PLACEPACKS

KILLS HOUSE MICE

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

Patented in the USA EPA Reg. No. 7173-206

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENTS: Hazard to Humans & Domestic Animals

CAUTION: Keep away from children, domestic animats 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. 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.

FIRST AID: Have this label with you when obtaining treatment advice. You may also call 1-800-351-1476 for emergency medical treatment information.

Il 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. Note to Physician or Veterinarian: Contains diffethiatione, an anticoagulant. For humans clogs that have ingested this product, or have obvicus poisoning symptoms (bleeding) or lowered prothrombin times, give Vitamin K₁ by intramuscular or oral administration. Check prothrombin time every 3 days until values return to normal.

FINURGNIBERTIAL HAZARDS: This recycler is troth to first and wildlife. Do not apply

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Do not apply

WARRANTY: Seller makes no warranty, expressed or implied, concerning use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of product when such use and/or handling is contrary to label instructions.

NET WEIGHT: 1.5 oz. (43 grams) ACCEPTED

Alternate warrant Salement Salement and Disputation of your money back

In the a violation of Federal law to use this product in a marrier inconsistent with its labeling.

READ THIS LABEL. Read this entire label and below at use directions and use precautions.

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PRECAUTIONARY STATEMENTS lazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. May be harmful or tatal 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 oclothing, Wash arms, hands and tace with soap and water after applying and before eating and smoking.

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Note to Physician or Veterinarian: Contains didethialone, an asteroament. Each because or done that have invested this

note to Physician or Vetermanian. Currains creamations, an anticoagulant. For humans or dogs that have ingested this product, or have obvious poisoning symptoms (bleeding) or owered prothorombin hime, give Vfamm (k, by intramuscular or oral administration. Check prothrombin hime every 3 days until values return to normal

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildfile. Do not apply directly to water,

STORAGE AND DISPOSAL

Storage: Store in original container in a 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.

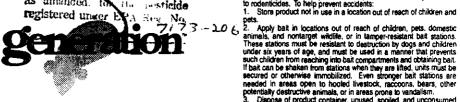
WARRANTY: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions

Product No

Alternate warranty statements. Satisfaction guaranteed or your money back

MAY 28 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended to ila jest**icide**



PELLETS PLACEPACKS

KILLS HOUSE MICE

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% *Patented in the U.S.A.

KEEP OUT OF REACH OF CHILDREN CAUTION: See side panel for additional precautionary statements.

LIPH/TECH* Milwaukee, ... (800) 351-1476

EPA Reg. No. 7173-206

3600 W. Elm Street Milwaukee, WI 53209

FPA Est. No. 7173-WI-1

NET WEIGHT: 1.5 ounces (1 bait pack) up to 50 pounds (approx. 533 bait packs) **DIRECTIONS FOR USE**

It is a violation of 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

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

potentially destructive animals, or in areas prone to vandalism.

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

bait as specified on this label.

USE RESTRICTIONS: This product may be used to control house mice. Do not place bait in areas where there is a possibility of contaminating tood or surfaces that come in direct contact with bool URBAN AREAS: This product may only be used in and around homes, and industrial, commercial and public buildings. This product may also be used in transport vehicles choicy trains, aircraft and in and around related port of terminal bridging. Applications 'around' buildings must be made in tamper-resistant backritations placed along the walls or other external parts of buildings (e.g., doorways, ramps, loading docks) where mice might seek to gain extrance.

NON-URBAN AREAS: In non-urban areas, this product may only be used inside of homes and agricultural full bings.

NON-URBAN ARIEAS: In non-urban axes, mis productiney only be used inside of homes and agricultural fulldings.

SELECTION QFTREATMENT AREAS: Determine areas where mice will most likely find and consume bat. Generally, these are along walls, by gnawed openings in corners and concased places, between floors or walls, or in locations where redents or their signs have been not been consumed with exhausting the consumer. seen. Removerat much alternative food as poscible

Seen. Removerat intertranternative tion as pusative.

APPLICATION DIFFECTIONS: Use one pack per placement. Space placements at 8 to 12 host intervalls. Maintain a constant supply of fresh bait for 16 days-owuntil signs of maune activity cease. Replace contaminated or spoiled that immediately. Collect and dispose of all visible dead anintale and leftover bait preperly. To discourage reintestation, timit sources of rodent food, water and harborage as much as possible. If reinfestation occurs, * feyéat treatment. For a continuous infestation, set up permanent bait stations and replenish hait as needed. bail as needed.

Page 3 of 3, Product label for EPA Reg. No. 7173-206 Submitted February 17, 2003