

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 28, 2003

300
17 5-631763

LiphaTech
3600 West 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.

Label review-continued

- 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.

Consequence for non-compliance

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 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.

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 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.

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.

Product No. Label No.

ACCEPTED
with **COMMENTS**
in EPA Letter Dated

MAY 28 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

7173-206



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 99.9975%
Total 100.0000%

*Patented in the U.S.A.

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.

LIPHA TECH

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

NET WEIGHT:

- 3 ounces (2 x 1.5 ounce bait packs)
- 4.5 ounces (3 x 1.5 ounce bait packs)
- 6 ounces (4 x 1.5 ounce bait packs)
- 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)

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 lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hooded 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 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, loading docks) where rats or mice might seek to gain entrance.

NON-URBAN AREAS: In non-urban areas, this product may only 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 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 three 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 bait packs only)

This package contains enough bait (12 oz.) to kill four to ten rats.

(Qualifier statement for package containing 10 bait packs only)

This package contains enough bait (15 oz.) to kill five to twelve rats.

Rats: Use 2 to 10 packs per placement. Space placements at 15 to 30 foot intervals. Maintain a constant supply of fresh bait for 15 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.

Follow-up: Replace contaminated or spoiled bait immediately. Collect and dispose of all visible dead animals and leftover bait properly. To discourage 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.

(04403)

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.

"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:

ACCEPTED with COMMENTS in EPA Letter Date

MAY 28 2003

Under the Federal Fungicide, and... as amended, for the registered under EPA Reg. 7173-206

APPLICATION DIRECTIONS: Use 2 to 10 packs per placement... STORAGE AND DISPOSAL: Store in original container... WARRANTY: Seller makes no warranty...

Liphatech, Inc., 3600 W. Elm Street, Milwaukee, WI 53209 (800) 558-351-1476



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

Active Ingredient: difethialone* 0.0025% Inert Ingredients: 99.9975% Total: 100.0000% *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... ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife.

WARRANTY: Seller makes no warranty, expressed or implied, concerning use of this product other than indicated on the label.

NET WEIGHT: 1.5 oz. (43 grams)

Alternate warranty statement: Satisfaction guaranteed or your money back.

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 the entire label and follow all use directions and use precautions... IMPORTANT: Do not expose children, pets or other nontarget animals to rodenticides... USE RESTRICTIONS: This product may be used to control Norway rats, roof rats and house mice...

"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:

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal... WARRANTY: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label.



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

Active Ingredient: difethialone* 0.0025% Inert Ingredients: 99.9975% Total: 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.

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

NET WEIGHT: 1.5 oz. (43 grams)

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

Alternate warranty statement: Satisfaction guaranteed or your money back.

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 other for recycling if available...

PRECAUTIONARY STATEMENTS: Hazard to Humans and Domestic Animals CAUTION: Keep away from children, domestic animals and pets... ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Do not apply directly to water.

"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)



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%
Inert Ingredients:	99.9975%
Total:	100.0000%

*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 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.
 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 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.

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
With Comments
EPA Letter Dated

Alternate warranty statement: Satisfaction guaranteed or your money back.

APPLICATION DIRECTIONS: Use one pack per placement. Space placements at 8 to 12 foot intervals. Maintain a constant supply of fresh bait for 15 days or more. Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and droppings. To discourage reinestation, limit sources of rodent food, water and harborage as much as possible. Repeat treatment. For a continuous infestation, set up permanent bait stations and replenish bait as needed. (04403)

STORAGE AND DISPOSAL: 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.

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

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 the 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, pets, domestic animals, and nontarget animals.
 2. Apply bait 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 hooled livestock, raccoons, bears, other potentially destructive animals, or in areas prone to vandalism.
USE RESTRICTIONS: This product may be used to control 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, loading docks) where mice might seek to gain entrance.
NON-URBAN AREAS: In non-urban areas, this product may only be used inside of homes and agricultural buildings.
SELECTION OF TREATMENT AREAS: Determine areas where 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 any alternate food as possible.

PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

CAUTION: 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. 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.

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 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

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. Label No.

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%
Inert Ingredients:	99.9975%
Total:	100.0000%

*Patented in the U.S.A.
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.

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

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

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 lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hooled 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 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, loading docks) where mice might seek to gain entrance.

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

SELECTION OF TREATMENT AREAS: Determine areas where 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 any alternate food as possible.

APPLICATION DIRECTIONS: 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. Replace contaminated or spoiled bait immediately. Collect and dispose of all visible dead animals and leftover bait properly. To discourage reinestation, limit sources of rodent food, water and harborage as much as possible. If reinestation occurs, repeat treatment. For a continuous infestation, set up permanent bait stations and replenish bait as needed. (04403)

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

Alternate warranty statements:
Satisfaction guaranteed or your money back.