7173-248



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

February 19, 2004

300 5-742972 17 5-748692

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

Attention: Mr. Thomas J. Schmit

Subject: Maki Rodenticide Bait Packs (Pellets) EPA Reg. No. 7173-208 Your amended application of July 25, 2003

**Purpose** The purpose of this submission is to revise your labels in accordance with PR Notices 93-3, 93-8, 97-5, 2001-1, and 2001-6.

Label

The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product.

1. Under "CAUTION", delete "or fatal".

2. Under "Urban Areas" in the 2<sup>nd</sup> Sentence, delete "and around".

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

stocks

ConsequenceIf these conditions are not complied with, the registration will be subjectfor non-<br/>complianceIf these conditions are not complied with, the registration will be subjectto cancellation in accordance with FIFRA section 6(e). Your release for<br/>shipment of the product constitutes acceptance of these conditions.

Formatting The Agency believes that the readability of the text could be improved if you changed the formatting of the label in certain areas:

- 1. In your "FIRST AID" and "NOTE TO PHYSICIAN" sections, consider clarifying the distinctions between headings, subheadings, and text, as shown by Enclosures 1 and 2.
- Under "STORAGE AND DISPOSAL", consider bolding and/or capitalizing "Storage", "Pesticide Disposal:", and "Container Disposal:" to clarify these subheadings and the accompanying texts, as LiphaTech had proposed on its last stamped, accepted labeling for this product on December 19, 2000.

Questions

If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or <u>peacock,dan@epa.gov</u> (by E-Mail).

Sincerely yours,

Daniel B. Peacock, Biologist Insecticide-Rodenticide Branch Registration Division (7504C)

Enclosures

1. Current Format and Text for "FIRST AID" and "NOTE TO PHYSICIAN"

- 2. Suggested Format and Text for "FIRST AID" and "NOTE TO PHYSICIAN"
- 3. Stamped label for EPA Reg. No. 7173-202
- 4. Minimum Type Size Requirements for Final Printed Labels

Letter

Dan Peacock, Disk135,A:\Bromadiolone\7173-208, revised label, .wpd

#### Page 3 of 4

### Enclosure 1. Current Format and Text for "FIRST AID" and "NOTE TO PHYSICIAN"

FIRST AID: Have label with you when obtaining treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice.

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. If inhaled: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor immediately for treatment advice.

Note to Physician: If ingested, administer Vitamin  $K_1$  intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

## Enclosure 2. Suggested Format and Text for "FIRST AID" and "NOTE TO PHYSICIAN"

Have	FIRST AID label with you when obtaining treatment advice.
If swallowed	<ul> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> </ul>
If on skin or clothing	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center, or doctor immediately for treatment advice.</li> </ul>
If inhaled	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to- mouth, if possible.</li> <li>Call a poison control center or doctor immediately for treatment advice.</li> </ul>
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor immediately for treatment advice.</li> </ul>

#### NOTE TO PHYSICIAN

Bromadiolone may reduce the clotting time of the blood and cause bleeding. If ingested, administer Vitamin  $K_1$  intramuscularly or orally. Repeat as necessary based on monitoring of prothrombin times.

## Outer Carton Label

## PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

CAUTION: Keep away from humans, domestic animals and pets. May be harmful or falal if swallowed or absorbed through the skin because this material may reduce the clotting ability of blood and cause bleeding. Do not get in eyes, or 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 If swallowed: Call a poison control center or doctor immediately

for treatment advice

If analyted: Cash poiser control centre boots with eater for treatment advice. 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 pienty of cool water for 15-20 minutes. Call a poison control center or doctor for treatment advice. If inhaled: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice. Note to Physician: II ingested, administer Vitamin K Note to Physician: II ingested, administer Vitamin K notersons, Repeat as necessary based on monitoring of prothromoin times. prothrombin times

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. 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. Storage: Store in original container in a cool, dry place inaccessible to chiktren 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 Disposat: 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, con-cerring 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.

EPA Reg. No. 7173-208

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

#### STORAGE AND DISPOSAL

Storage: Storage: Store in original container in a dry place inaccessible to children and pets. 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 quaranteed or your money back

## MAKI RODENTICIDE BAIT PACKS (PELLETS)

#### FOR INDOOR AND OUTDOOR RODENT CONTROL

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

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

Other ingredients ..... 99.995% 



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

#### NET WEIGHT:

EPA Est. No. 7173-WH1 4.4 OUNCES (5 x 0.88 oz. bait packs), or 5.3 ounces (6 x 0.88 oz. bait packs), or 7 ounces (8 x 0.88 oz. bait packs), or 8.8 ounces (10 x 0.88 oz. bait packs), or 10.6 ounces (12 x 0.88 oz. bait packs),

> 1 pound up to 50 pounds ACCEPTED with COMMENTS in EPA Lotter Dated

> > FEB 1 9 2004

LIPH/TECH

Under the Pederal Inserticide, Fungici le, and Endenticide Att as amended, for the perticide registered under EPA Rog. No. 7173-208

#### **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

MCADLING LADL: Near this entitle lader and broke all use directions and use precations. IMPORTANT: Do not expose children, pels, on 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.

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 These stations must be resistant to destruction by dogs and by 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 in booted. Even stronger bait stations are needed in areas open doas to hoofed livestock, raccoons, bears, or 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: For control of Norway Rats, Roof Rats and House Mice. Urban Areas: This product may be used in and around the

Urban Areas: This product may be used in and around the periphery of homes, industrial, commercial and public buildings. This product may also be used in and around transport vehicles (ships, trains, aircraft) and in related port or terminal buildings. This product may also be used in aileys Non-Urban Areas: This product may be used inside of homes and agricultural buildings. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast bait.

SELECTION OF TREATMENT AREAS: Determine areas where SELECTION OF TREATMENT AREAS: Determine areas where rats or mice will most likely find and consume the bait. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Remove as much alternative food as possible.

#### **APPLICATION DIRECTIONS:**

(Qualifier statement only for package containing 5 packs:) The bait packs in this package contain enough bait (4.4 oz.) to kill 1 to 3 rats.

(Qualitier statement only for package containing 6 packs.) The bait packs in this package contain enough bait (5.3 oz.) to kill 1 to 5 rats.

(Qualifier statement only for package containing 8 packs:) The bait packs in this package contain enough bait (7 oz.) to kill 2 to 6 rats.

(Qualifier statement only for package containing 10 packs;) The bait packs in this package contain enough bait (8.8 oz.) to kill 3 to 9 rats.

(Qualifier statement only for package containing 12 packs:) The bait packs in this package contain enough bait (10.6 oz.) to kill 3 to 10 rats.

Mice: Apply 1 bait pack per placement. Two packs may be placed at points of very high mouse activity. Space placements 8 to 12 feet apart. Maintain a constant supply of fresh bait for 15 days or

until fresh signs of mouse activity case. Rats: Apply 4 to 16 bait packs per placement. Space placements 15 to 30 leet apart. Maintain a constant supply of fresh bait for 10

ays or until fresh signs of rat activity cease. Follow-up: Replace contaminated or spolled bait immediately. Collect and dispose of all visible dead animals and leftover bait property. To discourage reinlestation, limit sources of rodent food, water and harhorage as much as possible. If reinlestation occurs, repeat treatment. For a continuous infestation, set up permanent bait stations and replenish bait as needed 24201:

## Place Pack Label

STORAGE AND DISPOSAL Do not contaminate water, bod or lead by storage or disposal. Storage: Store in original container in a cool, dry place inaccessible to children and pais. Posticed Disposal: Wastes resulting from the use of this product may disposed of on site or at an approved waste disposal backity. Container Disposal: Dispose of empty container in a sanitary landful, 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 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. (2400)	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	MAKI         BARAKI         BARAKI </th <th>PRECAUTION: Keep away from humans, domestic animals and pets. May be harmful or latal if swellowed or absorbed through the skin bacause this material may reduce the cloting ability of blood and cause bleeding. Do not get in eyes, on skin, or on clothing, Wash arms, Lands and Lee with scap and water after applying and before eating and smoking. FRST AID: Have this label with you when obtaining teatment advice. It is wellowed: Call a poisson control center or doctor mimediately for the dathment advice. It is neglished: Call a poisson control center or doctor mimediately for tradiment advice. It is neglished: Call a poisson control center or doctor mimediately for tradiment advice. It is neglished: Call a poisson control center or doctor mimediately for tradiment advice. It is neglished: Call a poisson control center or doctor for treatment advice. It is not active in mising eye Call a poisson control center or doctor for treatment advice. It in share or clothing: Take of contaninated clothing. Rens skin with plenty of coal water for 15-20 minutes. Call a poisson control center or doctor for treatment advice. It infaled: Move person to fresh atil. If person is not breathing, call 911 or ambiliance, then give artificial respiration, prelerably multi-to-mouth-to-mouth if possible. Call a poisson control center or doctor for treatment advice. Note to Physican. If ingested, administer Vitamin K1 intramuscularity or orably as indicated in bishydroxycournarin overdoses. Repeat as necessary based on monitoring of prothorubin times. EWHRONMENTAL HAZARDS: This pool pool is took to is and wildlite. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.</th>	PRECAUTION: Keep away from humans, domestic animals and pets. May be harmful or latal if swellowed or absorbed through the skin bacause this material may reduce the cloting ability of blood and cause bleeding. Do not get in eyes, on skin, or on clothing, Wash arms, Lands and Lee with scap and water after applying and before eating and smoking. FRST AID: Have this label with you when obtaining teatment advice. It is wellowed: Call a poisson control center or doctor mimediately for the dathment advice. It is neglished: Call a poisson control center or doctor mimediately for tradiment advice. It is neglished: Call a poisson control center or doctor mimediately for tradiment advice. It is neglished: Call a poisson control center or doctor mimediately for tradiment advice. It is neglished: Call a poisson control center or doctor for treatment advice. It is not active in mising eye Call a poisson control center or doctor for treatment advice. It in share or clothing: Take of contaninated clothing. Rens skin with plenty of coal water for 15-20 minutes. Call a poisson control center or doctor for treatment advice. It infaled: Move person to fresh atil. If person is not breathing, call 911 or ambiliance, then give artificial respiration, prelerably multi-to-mouth-to-mouth if possible. Call a poisson control center or doctor for treatment advice. Note to Physican. If ingested, administer Vitamin K1 intramuscularity or orably as indicated in bishydroxycournarin overdoses. Repeat as necessary based on monitoring of prothorubin times. EWHRONMENTAL HAZARDS: This pool pool is took to is and wildlite. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.
cool, dry plac proved waste by state and instructions.	sks individua	KEEP OUT OF REACH OF CHILDREN CAUTION See side panel for additional precautionary statements.	mestic An weed or abso eyes, of sku ninutes, t pres ninutes, Cal ninutes, Cal ninut
ce inaccessible k disposal tacility. 1 local authorities on the label. Buy (24202)	Ż	LIPHATECH" (800) 351-1476	innals sheed through in, or on clot ent, after the ent, after the ent, after the ration, prefer verdoses. Re verdoses. Re
Buyer s, o		NET WEIGHT: 0.88 oz (25 grams)	hing. hing. hing. hing. hing. hing. hing.

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. "Mouse only" place pack option: For retail sale as individual packs.

DIRECTIONS FOR USE at this in to use this product in a manner increasisative with is Labeleg at this entire label and below all use directions stand use precatitors ones chaltern, pets, or other increasing annuals and nonanger wildels, or in tam must be resistant to destinction by output annuals and nonanger wildels, or in tam must be resistant to destinction by output annuals and nonanger wildels or in tam must be resistant to destinction by output annuals and nonanger bat stations are conclusive, and unconsumed bat as specified on this label. For control at House the and around the periphery of homes, and asticut, and in related short may also be used in and around the periphery of homes, and astic and in related for may also be used in and around the periphery of homes, and and in related for may also be used in alloy of commencies and agricultural buildings is where there is a possibility of commence and agricultural buildings is where there is a possibility of commence and agricultural buildings is where there is a possibility of commence and agricultural buildings is where there is a possibility of commence and conceased places, between the end openings, in or beside burrows in corners and conceased places, between the or their sight have been seen. Remove as much attentiate food as possible	Image: Construction of the second state of the second s	STORAGE AND DISPOSAL: Storage: Store in original container in a dry place inaccessible to divide and pets. Disposal: it empty: Do not reuse this container Place in Trish or Offer for regiving it available. It partly field: Call your local solid product down any indoor or outdoor dhan. Never place unused product down any indoor or outdoor dhan. Manufactured by: Ltiphaeett, inc., 3600 W Elm Street, Miwaukee, WI 53203 (800) 351-1476	APPL/GATION DIBECTIONS: A spit 1 bait baits per discement. Two parks may be shored at lowers of very high mouse activity. Space placements 8 to 21 beet aput. Maintain a constaint strucky of tresh bait for 5 days or unit fresh spits of mouse activity case. Peptixe contaminated or spoted bait annihosate U. Colled and Spoke of all vested bait annihas and taffore that inporter 1 of days courage transleation. Inne sources of rodent food water and harborage as much as possible. If rentestation accurs report translations infestation, set up permanent bait stations FOR POSITION ONLY and replenesh bait as needed. [2203]
cubents transper-resstant bait of age, and must be all can be staken metals aread public briefaings aread port or terminal aread port or terminal aread port or terminal body contact with food. Do bait Generally, these body and waits, or in	No water or to areas where surface water is present of to internual areas below the mean high water mark. 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.		
	Alternate warranty statements: Satisfaction guaranteed or your money back.		

"Mouse only" outer carton label:

## PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

CAUTION: Keep away from humans, domestic Animitals and pets. May be harmful or fatal if swallowed or absorbed through the skin because this material 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 wallowed: Call a poison control center or doctor immediately

for treatment advice

for beaution doctors, the second 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.

control center or doctor for treatment advice. If inhaled: Move person to fresh air, if person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice. Note to Physician: If ingested, administer Vitamin K<sub>1</sub> intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothombit times.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. 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

outdoor drain

Warranty: Seller makes no warranty, excressed or implied, con-cerning the use of this product other than indicated on the tabel Buyer assumes all risk of use and or handling or it is material when such use and/or handling is contrary to label instructions.

EPA Reg. No. 7173-208

EPA Est No. 7173-WI-1

# MAKI

## RODENTICIDE **BAIT PACKS** (PELLETS)

#### FOR INDOOR AND OUTDOOR RODENT CONTROL

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: bromadiolone . : . . . . . . . . . . . 0.005% Other ingredients 99.995% Totat 100.000%



up to 50 pounds **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

Income and use precations. 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

Store product not in use in a location out of reach of children and pets.
 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 by 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 hooted hivestock, raccoors, bears, or other potentially destructive ammals, or in areas prone to vandalism.
 Dispose of product container, unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS: For control of House Mice. Urban Areas: This product may be used in and around the periphery of homes, industrial, commercial and public buildings. This product may also be used in and around transport vehicles (ships, trains, aircraft) and in related port or terminal buildings. This product may also be used in allowe alieve

alleys. Non-Urban Areas: This product may be used inside of homes and agricultural buildings. Do not place bait in areas where there is a possibility of contaminating lood or surfaces that come in direct contact with lood. Do not broadcast bait.

SELECTION OF TREATMENT AREAS: Determine areas where mice will most likely find and consume the bait. Generally these are along walls, by gnawed openings, in or peside burrows, in corpers and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Remove as much alternative lood as possible. have been seen. Hemove as nucle afternative lood as possible. APPL/CAT/ON DIRECTIONS: Apply 1 bart pack per placertrant. Two packs may be placed at points of very high incuse activity. Space placements 8 to 12 feet apart. Maintain a constant supply of firsh bart for 15 days or until fresh signs of incuse activity cease. Replace confismented or spc red bait immediately. Collect and dispose of all visible dead animals and leftover bait property. To discourage reinfestation limit sources of rothen tood, water and Latrodd as much as possible. If reinfustation occurs, repeat treatment. For a continuous whiles/auc., set up permanent bait stations and regions bait as needed. needed

24203

Alternate warranty statements Satisfaction guaranteed or your money back