

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

May 28, 2003

300  
17  
S-631764

LiphaTech  
3600 West Elm Street  
Milwaukee, WI 53209

Attention: Mr. Thomas Schmit

**Subject: Generation Bait Dispenser**  
**EPA Reg. No. 7173-210**  
**Revised Label**  
**Your amended application of February 19, 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 and to modify the use directions.
- 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. According to your last amendment application form and letter, you appear to have changed your product name from "**Generation Rodenticide Bait Dispenser**" to "**Generation Bait Dispenser**". Use this name on all labeling, including the outer, non-detachable, and detachable labels.
2. Modify the single feeding claim to

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

Refer to our letter of January 15, 1998.

**Label review-continued**

- 3. Left justify and bold the subheading, "**Hazard to Humans and Domestic Animals**".
- 4. Center and bold the main heading, "**Note to Physician or Veterinarian**".
- 5. 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.

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

- 6. Bold "**Storage**", "**Disposal**", "**If empty**", and "**If partly filled**" to highlight headings.
- 7. Indent and bold "**URBAN AREAS:**" AND "**NON-URBAN AREAS:**".
- 8. On your Detachable Label, 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.

- 9. Bold "**Storage**", "**Disposal**", "**If empty**", and "**If partly filled**" to highlight headings.

**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.

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**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](mailto: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\7173-210, revised label, 5-23-2003.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 K<sub>1</sub> 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.

**ACCEPTED**  
 with **COMMENTS**  
 in EPA Letter Dated:

MAY 28 2003

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended and the pesticide  
 registered under EPA Reg. No.  
 7173-210

Alternate warranty statements:  
 Satisfaction guaranteed or your money back.



**BAIT DISPENSER**

**KILLS 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. 7173-210 EPA Est. No. 7173-WI-1

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

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

**NET WEIGHT: 1.5 ounces (42.5 g)**

**DIRECTIONS FOR USE**

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

**THIS IS NOT A TAMPER-RESISTANT BAIT STATION. DO NOT USE THIS PRODUCT IN AREAS ACCESSIBLE TO CHILDREN, PETS, DOMESTIC ANIMALS OR NONTARGET WILDLIFE.**

**USE RESTRICTIONS:** For indoor use only, for the control of 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 bait dispenser may only be used in homes, industrial, commercial and public buildings. This product may also be used inside transport vehicles (ships, trains, aircraft) and inside related port or terminal buildings. Do not use this product in sewers or in any outdoor area.

**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 as much alternative food as possible. Use only on dry surfaces.

**SECURING BAIT DISPENSER:** If you desire to anchor this bait dispenser to a smooth clean surface, remove the cover sheet from the tape anchor located on the underside of the unit. If you wish to anchor the bait dispenser to a surface which will not allow the tape anchor to adhere, you may remove the tape anchor and place the dispenser over a nail or other such post anchored in the surface and protruding above the surface approximately 1 inch in order to inhibit lateral movement of the unit by mice. For more secure anchorage, a nail may be driven through the center post of the bait dispenser and into a wood or similar surface. Place bait dispenser in locations as specified under APPLICATION DIRECTIONS.

**APPLICATION DIRECTIONS:** Secure or place bait dispensers at 8 to 12 foot intervals on level surfaces in locations where the labeling permits this product to be used. After a bait dispenser is placed for use, make the bait available to mice by holding the base of the unit with one hand and gently lifting and turning the top portion in a counterclockwise direction. Stop when resistance to further turning is encountered (after about one quarter of a revolution). Do not attempt to open the unit further. Do not open units except when they are placed ready for use. Close units before removing them for reuse or disposal. Replace units which are emptied by mice or if bait becomes spoiled. Collect and dispose of all 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.

Page 2 of 2, Product label for  
 EPA Reg. No. 7173-210  
 Submitted February 19, 2003

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Inner single-panel (non-detachable) label

**generation Rodenticide Bait Dispenser**

Active Ingredient: difethialone\* . . . 0.0025%  
 Inert Ingredients . . . 99.9975%  
 Total . . . . . 100.0000%  
 \*Patented in the U.S.A.  
 EPA Reg. No. 7173-210  
 EPA Est. No. 7173-WI-1

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION:** Bait in this dispenser contain anticoagulant rodenticide. If swallowed, call a physician at once. See fold-out label for additional precautionary statements and first aid information.

**DO NOT USE THIS PRODUCT OUTDOORS. THIS IS NOT A TAMPER-RESISTANT BAIT STATION - DO NOT USE IN AREAS ACCESSIBLE TO CHILDREN, PETS, DOMESTIC ANIMALS & NONTARGET WILDLIFE.**  
 Read and follow all directions and precautions on the six-panel fold-out label when handling, using and storing this product.

Liphatech, Inc.  
 3600 W. Elm Street Milwaukee WI 53209  
 (800) 351-1476  
 Net weight 1.5 oz. (42.5 g)

Six-panel fold-out (detachable) label

**ACCEPTED with COMMENTS in EPA Letter Dated MAY 28 2003**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide registered for EPA Reg. No. 7173-210

**generation Rodenticide Bait Dispenser**

**KILLS HOUSE MICE & WARFARIN-RESISTANT HOUSE MICE**

Active Ingredient: difethialone\* . . . 0.0025%  
 Inert Ingredients . . . 99.9975%  
 Total . . . . . 100.0000%  
 \*Patented in the U.S.A.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION:** See inside panels for additional precautionary information.

**DO NOT USE THIS PRODUCT OUTDOORS. THIS IS NOT A TAMPER-RESISTANT BAIT STATION. DO NOT USE THIS PRODUCT IN AREAS ACCESSIBLE TO CHILDREN, PETS, DOMESTIC ANIMALS AND NONTARGET WILDLIFE.**

Net weight 1.5 oz. (42.5 g) ↓ LIFT HERE ↓

**PRECAUTIONARY STATEMENTS**

**HAZARDS 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 K<sub>1</sub> 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.

**SEE BACK PANEL FOR DIRECTIONS FOR USE. FOLLOW ALL LABEL DIRECTIONS AND PRECAUTIONS WHEN USING, HANDLING, OR STORING THIS PRODUCT.**

EPA Reg. No. 7173-210 EPA Est. No. 7173-WI-1  
 Liphatech, Inc.  
 3600 W. Elm Street  
 Milwaukee, WI 53209  
 04503

House mice can consume a lethal dose in one night's feeding with first dead mice appearing four or five days after feeding begins.

**DIRECTIONS FOR USE**

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