

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 18, 2004

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

300
17
S-750637

Attention: Mr. Thomas J. Schmit

Subject: Maki Paraffinized Pellets
EPA Reg. No. 7173-212
Your letter of November 20, 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 2nd Sentence, delete "and around".
- Label-continued** 3. For products containing Bitrex® , we have allowed claims such as "Contains Bitrex®" and its associated logo, and we have allowed product names to include the words "with Bitrex". However, we have not approved the claim, "Contains bittering agent" because we have not received data to verify the extent to which this ingredient would function in such a capacity in rodent baits. Therefore, the claim, "Contains bittering agent" may not appear on this or other rodent baits.
- 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 registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for 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.
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 January 9, 1997.

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)

- 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 labels for EPA Reg. No. 7173-212
 4. Minimum Type Size Requirements for Final Printed Labels

Letter Dan Peacock, Disk135,A:\Bromadiolone\7173-212, revised label.wpd

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 K₁ 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"

FIRST AID	
Have label with you when obtaining treatment advice.	
If swallowed	<ul style="list-style-type: none"> •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 on skin or clothing	<ul style="list-style-type: none"> •Take off contaminated clothing. •Rinse skin immediately with plenty of water for 15-20 minutes. •Call a poison control center, or doctor immediately for treatment advice.
If inhaled	<ul style="list-style-type: none"> •Move person to fresh air. •If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. •Call a poison control center or doctor immediately for treatment advice.
If in eyes	<ul style="list-style-type: none"> •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.
NOTE TO PHYSICIAN	
Bromadiolone may reduce the clotting time of the blood and cause bleeding. If ingested, administer Vitamin K, intramuscularly or orally. Repeat as necessary based on monitoring of prothrombin times.	

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

CAUTION: Keep away from humans, domestic animals 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 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 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.

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 K₁ intramuscularly or orally as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of 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 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.

EPA Reg. No. 7173-212

EPA Est. No. 7173-WI-1

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.

MAKI

Paraffinized Pellets

FOR INDOOR AND OUTDOOR URBAN 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
FOUR OR FIVE DAYS AFTER FEEDING BEGINS**

Active ingredient: bromadiolone	0.005%
Other ingredients	99.995%
Total	100.000%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See side panel for additional precautionary statements.

LIPHATECH

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

NET CONTENTS:
1 pound up to 500 pellets
ACCEPTED WITH COMMENTS
in EPA Letter Dated:

FEB 18 2004

Optional marketing statements:
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
Birex™ is a trademark of Merial, Ltd., Edinburgh, Scotland
Registered under EPA Reg. No.



7173-212

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 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 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 hooved 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. 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.

Urban areas: This product may be used in and around the periphery of homes, food processing facilities, 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 alleys.

Non-urban areas: May be used inside of homes and agricultural buildings.

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. Protect bait from rain or snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS

RATS: Apply 4 to 16 ounces of bait per placement. Placements usually should be spaced at intervals of 15 to 30 feet. Maintain a constant supply of fresh bait for 10 days or until signs of rat activity cease.

MICE: Apply 1/4 to 1/2 ounce of bait per placement. Space placements at 8 to 12 foot intervals. Larger placements (up to 2 ounces) may be needed at points of very high mouse activity. 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 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, establish permanent bait stations and replenish bait as needed.

(29403)

5/5