

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 4, 2004

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

300
17

5-748522

Attention: Mr. Thomas J. Schmit

Subject **Maki Pellets Plackpacks**
 EPA Reg. No. 7173-213
 Your application of October 13, 2003

Purpose The purpose of your submission is to amend this product to add package sizes and to comply with PR Notices 93-3, 93-8, 97-5, 2001-1 and 2001-6.

Label The labeling for this product 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 change, before you ship your product.

1. Under "**If swallowed**", follow the standard language under PR Notice 2001-1.
2. Revise your "**Environmental Hazards**" text as follows:

This product is extremely toxic to mammals and birds. Dogs, cats, and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. This pesticide is toxic to fish. Do not apply directly ... water mark. Do not contaminate water when disposing of equipment wash water or rinsate.

Existing stocks Stocks of product with 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.

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)

Enclosure 1. Stamped label

Letter Dan Peacock, Disk149,A:\Bromodialone\7173-213, revised label, 7-22-2004.wpd

Outer Carton Label

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. 7173-213

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.

Optional marketing statements:

Contains bittering agent

Bitrex™ is a trademark of Macfarlan Smith Ltd., Edinburgh, Scotland



MAKI PELLETS PLACEPACKS

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.

LIPHA/TECH

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

NET WEIGHT:

- 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),

ACCEPTED
with COMMENTS
in EPA letter dated: 50 pounds

AUG 4 2004

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

7173-213

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 lamper-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 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. 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, 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: This product 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. 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.

(Qualifier 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 cease.

Rats: Apply 4 to 16 bait packs per placement. Space placements 15 to 30 feet apart. Maintain a constant supply of fresh bait for 10 days or until fresh signs of rat 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.

(28-103)

Place Pack Label

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 the 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 eyes 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.

MAKI PELLETS PLACEPACKS

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

Active Ingredient: bromadiolone 0.005%
 Inert Ingredients 99.995%
 Total 100.000%

EPA Reg. No. 7173-213 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: 0.88 oz (25 grams)

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.

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 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. (2/10/01)

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.

Optional marketing statements:

Contains bittering agent

Bitrex™ is a trademark of Macfarlan Smith Ltd., Edinburgh, Scotland



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

MAKI PELLETS PLACEPACKS

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

NET CONTENTS:
0.88 oz (25 grams)

Active Ingredient: bromadiolone 0.005%
Inert ingredients 99.995%
Total 100.000%
EPA Reg. No. 7173-213 EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN
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.

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.

APPLICATION DIRECTIONS: 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 cease. Replace, contaminated or spoiled bait immediately. Collect and dispose of all dead rodents and baited rodent traps from the area. Discourage reinfestation from sources of rodent food. Water and harborage must be removed as possible. Reinfestation occurs: repeat treatment. For a continuous infestation, set up permanent bait stations and replenish bait as needed. (21)

STORAGE AND DISPOSAL: Store in original container in a dry place inaccessible to children and pets. Dispose: 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.

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

UPC symbol
FOR POSITION ONLY

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 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. 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 where rodents are likely to be secured, spoiled, and unconsumed bait as specified on this label.
3. Dispose of product container, unused, spoiled, and unconsumed bait as specified on this label.
USE RESTRICTIONS: For 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. Do not broadcast bait.
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 inside of homes and agricultural buildings.
Non-urban areas: This product may be used inside of homes and agricultural buildings.
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 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.



Optional marketing statements:
Contains baiting agent
Baitex™ is a trademark of Maclean Smith Ltd., Edinburgh, Scotland

"Mouse only" outer carton label:

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.
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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
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.

MAKI PELLETS PLACEPACKS

KILLS HOUSE MICE

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.

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

NET WEIGHT:
0.88 ounces
up to
50 pounds

EPA Reg. No. 7173-213 EPA Est. No. 7173-WI-1

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

USE RESTRICTIONS: For 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. Do not broadcast bait.

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 alleys.

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APPLICATION DIRECTIONS: 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 cease. 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. (21)

Alternate warranty statements:
Satisfaction guaranteed or your money back.