

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 2, 2005

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

R31
17
5-767068
D-348586

Attention: Mr. Thomas J. Schmit

Subject **Generation Mini Blocks**
 EPA Reg. No. 7173-218
 Your amended application of August 27, 2004

Purpose This submission, under section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), adds burrows/sewers as sites; adds a wrapper to each block; and includes a label for a "mouse only" product.

Data We have reviewed the previously submitted studies (MRID Nos. 454620-01 and -02) in relation to this current amendment. Assuming that the type of wrapper used in the tests for EPA Reg. No. 7173-235 is the same type of wrapper to be used for EPA Reg. No. 731-218, the claims for the sewer and burrow use are acceptable.

Label The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable, with the following changes:

1. In the "Note", change "lowered" to "prolonged".

A copy of the stamped label is enclosed for your records.

Consequences for non-compliance If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Existing stocks You have 18 months to use stocks of product with existing labeling.

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 Stamped label

Location Dan Peacock, USB 512 mb Flash Drive 1, E:\1-7-2005 Backup\Dan's Office Work\A Flash Drive 1\Difethialone\7173-218, add burrows,sewers; indi wrapped units; inc mouse only label.wpd

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. May be harmful if swallowed, because it reduces the clotting ability of blood and causes bleeding. Avoid contact with eyes, skin or 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.

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, 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.

Product No. Label No.

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 in

ACCEPTED with COMMENTS
EPA Letter Dated:

MAR 2 2005

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 7173-218

GENERATION MINI BLOCKS

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. 7173-218

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 pound (approx 23 x 20 gram blocks)
up to

50 pounds (approx 1134 x 20 gram blocks)

or

4.2 ounces (6 x 20 gram blocks)

5.6 ounces (8 x 20 gram blocks)

7 ounces (10 x 20 gram blocks)

8.5 ounces (12 x 20 gram blocks)

11.2 ounces (16 x 20 gram blocks)

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 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, 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: May be used indoors and in transport vehicles (ships, trains, aircraft). May be used outdoors within 15 feet of homes, food processing facilities, industrial, commercial, agricultural and public buildings, and similar manmade structures.

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 or beside burrows, 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 only for package containing 6 blocks:) This package contains enough bait (4.2 oz.) to kill 1 to 3 rats.

(Qualifier statement only for package containing 8 blocks:) This package contains enough bait (5.6 oz.) to kill 1 to 4 rats.

(Qualifier statement only for package containing 10 blocks:) This package contains enough bait (7 oz.) to kill 2 to 7 rats.

(Qualifier statement only for package containing 12 blocks:) This package contains enough bait (8.5 oz.) to kill 3 to 8 rats.

(Qualifier statement only for package containing 16 blocks:) This package contains enough bait (11.2 oz.) to kill 3 to 12 rats.

Mice: Apply one block per placement. Two blocks may be needed 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 signs of mouse activity cease.

Rats: Apply 6 to 23 blocks per placement. Space placements 15 to 30 feet apart. Maintain a constant supply of fresh bait for 10 days or until signs of rat activity cease.

For burrows, insert one or two blocks deep into each active burrow. Check treated burrows each morning and evening to make sure that bait has not been pushed out of burrows.

For sewer applications, securely attach one end of a wire to bait blocks and the other end to a stationary structure such as the bottom step of manhole ladder or to a sewer grate, allowing just enough wire for bait to rest on manhole benching. If benching is not present, suspend bait a few inches above the high water line or place bait on a board supported by opposing steps of the ladder. Securing bait in this manner will minimize chances for removal by rats or water. Place at least 15 bait blocks per manhole.

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.

(23804)

"Full label" wrapper label option: For retail sale in outer package containing 6 or more individually-wrapped mini blocks, with size-specific qualifier statements on outer package label: 4/5

Optional marketing statements for use on individually-wrapped blocks:

**EACH BAIT BLOCK IS INDIVIDUALLY WRAPPED
NO NEED TO TOUCH THE BAIT!**

APPLICATION DIRECTIONS: Mice: Apply one block per placement. Two blocks may be needed at points of very high mouse activity. Space placements 6 to 12 feet apart. Maintain a constant supply of fresh bait for 15 days or until signs of mouse activity cease. Rats: Apply 6 to 23 blocks per placement. Space placements 15 to 30 feet apart. Maintain a constant supply of fresh bait for 10 days or until signs of rat activity cease. For burrows, insert one or two blocks deep into each active burrow. Check treated burrows each morning and evening to make sure that bait has not been pushed out of burrows. Follow-up: Replace contaminated or spoiled bait immediately. Collect and dispose of all visible dead animals and leftover bait property. 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. (23804)

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

GENERATION MINI BLOCKS

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. 7173-218

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 if swallowed, because this product reduces the clotting ability of blood and causes bleeding. Avoid contact with eyes, skin or 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. 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, 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 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: 0.7 oz. (20 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** 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 spoiled 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:** May be used indoors and in transport vehicles (ships, trains, aircraft). May be used outdoors within 15 feet of homes, food storage areas, and other residential, commercial, agricultural and public buildings, and similar man-made structures. **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 bait. Generally, these are along walls by ground openings, in or beside burrows, 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.

"Abbreviated" wrapper label option: For retail or commercial sale in outer package containing 6 or more wrapped blocks, with size-specific qualifier statements on outer package label:

Optional marketing statements for use on individually-wrapped blocks:

**EACH BAIT BLOCK IS INDIVIDUALLY WRAPPED
NO NEED TO TOUCH THE BAIT!**

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. (23804)

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.

GENERATION MINI BLOCKS

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. 7173-218

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.

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

NET WEIGHT: 0.7 oz. (20 grams)

Alternate warranty statement: Satisfaction guaranteed or your money back

PRECAUTIONARY STATEMENTS: Hazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. May be harmful if swallowed, because this product reduces the clotting ability of blood and causes bleeding. Avoid contact with eyes, skin or 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. 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, or to areas where surface water is present or to intertidal areas below the mean high water mark.

Page 2 of 3, Product label for
EPA Reg. No. 7173-218
Submitted August 27, 2004

"Mouse-only" wrapped block label option: For retail sale as individual, wrapped blocks, or in outer package containing 1 or more wrapped blocks:

5/5

UPC
(for position only)

GENERATION MINI BLOCKS

KILLS HOUSE MICE

HOUSE MICE CAN CONSUME A LETHAL DOSE
IN ONE NIGHT'S FEEDING WITH FIRST DEAD MICE
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. 7173-218

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 if swallowed, because this product reduces the clotting ability of blood and causes bleeding. Avoid contact with eyes, skin or clothing. Wash arms, hands and face with soap and water after applying and before eating and smoking.
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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: 0.7 oz. (20 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** 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 locations that rodents such as children, pets, domestic animals, and nontarget wildlife cannot reach. 3. These bait stations must be resistant to destruction by dogs and children under six years of age, and must be used in areas open to hooded livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism. Even stronger bait stations are needed in areas open to hooded 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: 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: May be used indoors and in transport vehicles (ships, trains, aircraft). May be used outdoors within 15 feet of homes, food processing facilities, industrial, commercial, agricultural and public buildings, and similar manmade structures.
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 or beside burrows, 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.

Optional marketing statements for use on individually-wrapped blocks:

**EACH BAIT BLOCK IS INDIVIDUALLY WRAPPED
NO NEED TO TOUCH THE BAIT!**

APPLICATION DIRECTIONS: Apply one block per placement. Two blocks may be needed 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 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. (23804)

STORAGE AND DISPOSAL: Storage: Store in original container in a dry place inaccessible to children and pets. Disposal: Do not reuse this container. Place in trash or other 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

PRECAUTIONARY STATEMENTS
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EPA Reg. No. 7173-218

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: 0.7 ounces (1x 20 gram block)
up to 50 pounds (approx. 1134 x 20 gram blocks)

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.
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Optional marketing statements for use on individually-wrapped blocks:

**EACH BAIT BLOCK IS INDIVIDUALLY WRAPPED
NO NEED TO TOUCH THE BAIT!**

Page 3 of 3, Product label for
EPA Reg. No. 7173-218
Submitted August 27, 2004

Product No. Label No.

Alternate warranty statements:

Satisfaction guaranteed or your money back.