

7173-222

06/16/2005

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 16, 2005

Lipha Tech, Inc.
3600 West Elm Street
Milwaukee, WI 53209

305 - DP 31267a
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Attention: Mr. Thomas J. Schmit

Subject **Maki Green Paraffin Blocks**
EPA Reg. No. 7173-189
EPA Reg. No. 7173-222
Response to the letter from LiphaTech dated June 18, 2003.

The submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following comments:

- Comments**
- 1 In the letter dated June 19, 2003, the resubmitted Data Matrix dated January 22, 2003, has been corrected to reflect the appropriate Accession number for the study regarding Warfarin resistance in Rats.
 2. In response to your inquiry about instructions in the guidelines for handling and placing the bait for wax bait studies, the directions for mice or rats is the same and is located in OPP 1.213 or 1.214,

6. Procedure

6.3... The gross weight of each container and its contained food are determined daily and either (1) returned to starting weight by addition of the given food or (2) left at the gross weight as long as there is adequate food remaining in excess of the daily food requirement.... Spilled food must be recovered and weighed to establish exact food consumption data.

Cutting or shaving the wax blocks or pellets to get an exact weight is not an acceptable practice. The bait must be presented as it is to be used by the consumer.

**Comments
(Cont.)**

- 3. In an efficacy review dated April 17, 2003, W. Jacobs states: "In the efficacy review of 11/19/02, I concluded that the Farrell (LT No 02096) study could have been accepted 'But for the likely problem of altering of the weathered bait'. Its applicability to the new formulation being proposed for these products was not documented at the time but is now established by the batch sheet that is discussed above (12902)." The batch sheet provided for review (12902) is acceptable.
- 4. The study assigned MRID 45846101 was reviewed by W. Jacobs in his review dated April 17, 2003. He states on page 12: "Based upon Farrell's account in the 'Response' document, I have concluded that the altering the weathered bait may not have been as serious a problem in this study and in the rat study (MRID 45730701) than I originally had feared. Therefore, I have decided to accept the MRID 45730701 and MRID 45846101 reports as being sufficient to support claims that the 'blonde' formulation pending for 7173-189 and 7173-222 may be claimed to be 'weather-resistant' and effective in wet or damp areas. Directions for sewer use may be considered for such products."
- 5. The statement from D. Peacock's letter describing the rodent-relevant dimensions: "(Note that the need to preserve rodent-relevant dimensions is why it is important not to doctor bait blocks for the laboratory's convenience when efficacy trials are run)." Simply means that the bait edges should remain in tact and that the rodent-relevant dimensions refers to the shape of the extrusion. The shape being one with edges and easy access for rodents to take small bites on the run since that is the way they feed.

**Label
Comments**

The label for 7173-189 is acceptable with the following comments:

Change the name of the National Pesticide Telecommunications Center to the National Pesticide Information Center.

Add the phone number for the NPIC under **DIRECTIONS FOR USE, Read This Label** and follow all use direction and precautions. For information on this product (including health concerns, medical emergencies, or pesticide incidents) call the National Pesticide Information Center at 1-800-858-7378.

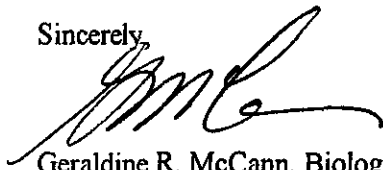
The labels for 7173-222 (dated November 25, 2002) is acceptable with the following comment:

Change the name of the National Pesticide Telecommunications Center to the National Pesticide Information Center.

Questions

If you have any questions or comments about this letter, please contact me at 703-605-0716 (by phone), 703-305-6596 (by fax), or mccann.geri@epa.gov (by E-Mail).

Sincerely,



Geraldine R. McCann, Biologist
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

Stamped Labels for 7173-189 and 7173-222

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PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: May be harmful if swallowed or absorbed through skin because it may reduce the clotting ability of blood and cause bleeding. Causes moderate eye irritation. Do not get in eyes, on skin or on clothing. Wash arms, hands and face before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long sleeve shirt and long pants, shoes plus socks, and gloves when handling this product, and wash this clothing separately from other laundry. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.

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.

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 bromadiolone, 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 mammals and birds. Predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. 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 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.

EPA Reg. No. 7173-222 EPA Est. No. 7173-WI-1



maki

RODENTICIDE BLOCK

**KILLS NORWAY RATS,
ROOF RATS, HOUSE MICE &
WARFARIN-RESISTANT NORWAY RATS
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: 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
3600 W. Elm Street
Milwaukee, WI 53209
1-800-351-1476

**NET WEIGHT:
4 ounces (113.5 grams) or
8 ounces (227 grams) or
12 ounces (340 grams)**

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

JUN 16 2005

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

7173-222

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 precautions. For information on this product (including health concerns, medical emergencies or pesticide incidents) call the National Pesticide Telecommunications Network at 1-800-858-7378.

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 hooled 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: For control of Norway rats, roof rats and house mice in and around homes, industrial, commercial agricultural and public buildings. This product may also be used in transport vehicles (ships, trains, aircraft), and in and around related port or terminal buildings. Limit outdoor bait placements to within 15 feet of structures such as buildings or retaining walls, fences, streets, sidewalks, food or feed storage areas, lumber piles, trash containers or other structural features providing potential food or harborage for rats and/or mice. Do not place near or inside ventilation duct openings. Do not contaminate water, food, feedstuffs, food or feed handling equipment, or milk or meat handling equipment. Do not broadcast bait.

SELECTION OF TREATMENT AREAS: Determine where rats or mice are likely to find and consume bait, such as along walls, by gnawed openings, corners and concealed places, between floors or walls, in burrows, or locations where rodents or their signs are seen. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

(Qualifier statement only for 1 x 4 oz. block package size:)
This package contains enough bait (4 oz.) to kill 1 to 3 rats.

(Qualifier statement only for 2 x 4 oz. block package size:)
This package contains enough bait (8 oz.) to kill 2 to 7 rats.

(Qualifier statement only for 3 x 4 oz. block package size:)
This package contains enough bait (12 oz.) to kill 3 to 12 rats.

Each bait block is scored to be broken into 1-oz. pieces.

Mice: Break block and apply two 1-oz. pieces of block per placement. 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 four to sixteen 1-oz. pieces of block 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.

For burrows, insert one to four 1-oz. pieces of block 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 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.

Alternate warranty statements:

Satisfaction guaranteed or your money back.

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.

**Product label for
EPA Reg. No. 7173-222
Submitted November 25, 2002**