

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 12, 2005

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

Attention: Mr. Thomas J. Schmit

Subject: Generation Blue Pellets
EPA Reg. No. 7173-229
Amendment to the label for the above product dated February 5, 2004.

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

- | | |
|--------------------------------|---|
| Signal Word | 1. The primary eye irritation study (MRID 462060-01) provided is acceptable and assigned a Toxicity Category IV. The signal word for this product is "CAUTION". |
| Weather Resistant Claim | 2. "Burrow use" and "weather/moisture resistant" claims on the label are acceptable. The MRIDs supporting these claims are MRID 453273-07 and 453273-08. |
| Label Language | 3. The proposed label change adding package sizes 8, 10, and 12 ounces is acceptable. The proposed bulk sizes from 1 to 50 pounds are also acceptable. |

Please change the statement under **DIRECTIONS FOR USE, For Rat Burrows:**

"Insert 1 to 2 bait packs..." to "Insert 3 to 4 ounces deep into each active burrow and no more than 16 ounces per burrow system."

**Label
Language
(Cont.)**

4. In the **FIRST AID** statement, modify after "Do not give anything by mouth to an unconscious person." to include:
- a. If on skin or clothing: Remove contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
 - b. Have this label with you when obtaining treatment advice.
Add: a poison control center number (Insert a 24-hour contact number). You may also insert the number for the National Pesticide Information Center number: 1-800-858-7378.
 - c. The wording incorporated in the **PRECAUTIONARY STATEMENT** required by PR Notices 93-3 and 93-8 is acceptable.
 - d. The additional marketing statements shown on the current label are acceptable.

**Confidential
Statement of
Formula**

5. The revised Basic CSF (dated February 6, 2004) and the justification for the revised upper and lower limits are acceptable.
6. The three Alternate CSF's (dated February 6, 2004)are acceptable.

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 (s):

Stamped Label
National Pesticide Information Center brochure

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PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. If swallowed, this product reduces the ability of blood and cause bleeding. Do not get in eyes, or on clothing. Wash arms, hands and face with soap 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. 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 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.

Optional marketing statements:

Contains bittering agent

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



BLUE PELLETS

**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. 7173-229

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:

8 ounces, or 10 ounces, or 12 ounces, or
1 pound up to 50 pounds

with COMMENTS
In EPA Letter Dated
MAY 12 2005

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

7173-229

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 hooded 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 corners and concealed places, between floors or walls, in burrows, or in locations where rodents or their signs have been seen. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

(Qualifier statement for package containing 8 ounces of bait only:)

This package contains enough bait (8 oz.) to kill two to seven rats.

(Qualifier statement for package containing 10 ounces of bait only:)

This package contains enough bait (10 oz.) to kill three to nine rats.

(Qualifier statement for package containing 12 ounces of bait only:)

This package contains enough bait (12 oz.) to kill three to ten rats.

Mice: Apply 1/4 to 1/2 ounce of bait per placement. Larger amounts (up to 2 ounces) may be placed at points of very high mouse activity. Space placements at 8 to 12 foot intervals. Maintain a constant supply of fresh bait for 15 days or until signs of mouse activity cease.

Rats: Apply 3 to 16 ounces of bait per placement. Space placements at 15 to 30 foot intervals. Maintain a constant supply of fresh bait for 10 days or until signs of rat activity cease.

For rat burrows, insert 1 to 2 bait packs 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.

(03304)