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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

July 26, 2007

7165 813763

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

Attention: Ms. Rachel M. Callies

Subject: Difethialone Mini Blocks

EPA Reg. No. 7173-236

Your amended application of March 12, 2007

Your resubmission of June 21, 2007

Purpose

The purpose of this submission is to revise the label of this product, under section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

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 change, before you ship your product.

- 1. Revise the 1st Sentence of your "USE RESTRICTIONS", wherever it occurs, to read, "This product may **only** be used to control"
- 2. Revise the 2nd Sentence under "CAUTION", wherever it occurs, to read: "May be harmful if swallowed or absorbed through the skin because it may reduce the clothing ability of blood and cause bleeding."
- 3. On the full mini block label wrapper label, add this 2nd Sentence after "**READ THIS LABEL**": "It is illegal to sell these mini blocks individually." On abbreviated mini block label wrapper, make a similar change in the 3rd Sentence.

Existing stocks
Questions

Stocks of existing labels may be used for eighteen (18) months.

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, Flash Drive, 2gb, P:\Documents\Word, WP, Excel,

etc\Difethialone\7173-236, rev label, 7-23-2007.doc

PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. If swallowed, 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

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.

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

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 prolonged 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 toyic to fish and wildlife Predatory, and scavenging.

toxic to fish and wildlife. 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

Do not contaminate water, rood or reed by storage of 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. stay out of smoke.

WARRANTY: To the extent consistent with applicable law, 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. 7173-236 · EPA Est. No. 7173-WI-1

Alternate "Storage and Disposal" statement for packaging intended solely for household use:

STORAGE AND DISPOSAL:

This is a nonrefillable container.

This is a nonrefiliable container.

Storage: Store in original container in a cool, dry place inaccessible to children and pets.

Disposal: If empty: Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIFETHIALONE 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 0.005%

KEEP OUT OF REACH OF CHILDREN **CAUTION**

See side panel for additional precautionary statements.

Net Weight:

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)

of pound up to 50 pounds

Liphatech, Inc.
LIPH/TEGHCEP 1008 W. Eim Street
COMMENTA 51-1476 in EPA Letter Dated:

JUL 26 2007

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

Optional marketing statements: 7,73-236 Contains bittering agent

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



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

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 tamperresistant 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: This product may be used in and around homes, industrial, commercial, agricultural and public building, food processing facilities and similar man-made structures. May also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product may also be used in alleys.

Non-urban Areas: This product may only be used inside of homes and agricultural, industrial and commercial

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 for package containing 6 blocks:)
This package contains enough bait (4.2 oz.) to kill 1 to 3 rats.
(Qualifier statement for package containing 8 blocks:) This package contains enough bait (5.6 oz.) to kill 1 to 4 rats. (Qualifier statement for package containing 10 blocks:)
This package contains enough bait (7 oz.) to kill 2 to 7 rats. Cualifier statement for package containing 12 blocks:)
This package contains enough bait (8.5 oz.) to kill 3 to 8 rats.
(Qualifier statement 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

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

Follow-up: Replace contaminated or spoiled bait Collect and dispose of all visible dead immediately. 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:

APPLICATION DIRECTIONS: 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.

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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.

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

(414) 351-1476

Keep away from children, domestic animals and pets. If swallowed, 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 prolonged 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. 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.

WARRANTY: To the extent consistent with applicable law, 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.

Net Weight: 0.7 ounces (20 grams)

Alternate warranty statements:
Satisfaction guaranteed or your money back.

This is a nonrefillable container.

Storage: Store in original container in a cool, dry place inaccessible to children and pets. Storage: Store in original container in a cool, dry place inaccessible to children and pets. Disposal: If empty: Do not reuse or refill this container. Place in trash or offer for Disposal: If empty: Do not reuse or refill this container. Place in trash or disposal recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain. for household use: Alternate "Storage and Disposal: statement for packaging intended solely

Bitrex is a trademark of Macfarlan Smith Ltd., Edinburgh, Scotland Contains bittering agent Optional marketing statements

Optional marketing statements for use on individually-wrapped blocks: EACH BAIT BLOCK IS INDIVIDUALLY WRAPPED NO NEED TO TOUCH THE BAIT

ly-wrapped blocks, Full label wrapper: with size-specific qualifier statements For retail or commercial sale in outer package containg on outer package label 6 or more individu

BLOCKS

KILLS NORWAY RATS, ROOF RATS, **HOUSE MICE AND WARFARIN-RESISTANT HOUSE**

EPA Est. No.

EPA Reg. No. 7173-236

REACH OF CHILDREN

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

OUT OF

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.

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: This product may be used in and around homes; industrial, commercial, agricultural and public building, food processing facilities and similar man-made structures. May also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product may also be used in alleys. Non-urban Areas: This product may only be used inside of homes and agricultural, industrial and commercial 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.

Abbreviated wrapper: individually-wrapped WARRANTY: To the extent consistent with applicable law, 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 blocks, with size-specific qualifier statements For retail or commercial sale in outer package containg 6 outer pa or more

BLOCKS

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

EPA Est. No. 7173-WI-1

EPA Reg. No. 7173-236 AEP P 2 OF REACH OF

STORAGE AND DISPOSAL

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste Container Disposal: Dispose of empty container in a sanitary landfill, or by incineration, or if allowed by state and

See side panel for additional precautionary statements. AUTION

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.

local authorities, by burning. If burned, stay out of smoke.

when such use and/or handling is contrary to label instructions.

LIPH/TECH

Liphatech, Inc. 3600 W. Elm Street Milwaukee, WI 53209 414-351-1476

Net Weight: 0.7 ounces (20 grams)

INTECTIONS 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 self these placepacks individually.

PRECAUTIONARY STATEMENTS: Hazard to Humans and Domestic Animals

CHILDREN

CAUTION: Keep away from children, domestic animals and pets. If swallowed, 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 prolonged 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. 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.

Contains bittering agent

Bitrex¹ is a trademark of Macfarlan Smith Ltd., Edinburgh, Scotland

Optional marketing statements

Alternate warranty statements:

isfaction guaranteed or your

"Storage and Disposal: statement for packaging intended

EACH BAIT BLOCK IS INDIVIDUALLY WHAPPED NO NEED TO TOUCH THE BAIT!

is a nonrefiliable container.

Is a nonrefiliable container in a cool, dry place inaccessible to children and pets. age: Store in original container in a cool, dry place inaccessible to children and pets. osal: If empty: Do not reuse or refill this container. Place in trash or offer for cling if available. If partly filled: Call your local solid waste agency for disposal cling if available. If partly filled: Call your local solid waste agency for disposal uctions. Never place unused product down any indoor or outdoor drain.

label:

, Edinburgh, Scotlanc

Satisfaction guaranteed or your money back

Alternate warranty statements.

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.

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. (07107)

STORAGE AND DISPOSAL

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Storage: Store in original container in a cool, dry place inaccessible to children and pets.

Disposal: If empty: Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Keep away from children, domestic animals swallowed, this product reduces the clotting a and causes bleeding. Avoid contact with cocothing, Wash arms, hands and face with so after applying and before eating and smoking after applying and before eating and smoking

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

(414) 351-1476

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 prolonged prothrombin times, give Vitamin K₁ by intramuscular or oral administration. Check prothrombin time every 3 days until values return to normal.

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lier makes no was use of this property yer assumes all the such use Net Weight: To the extent consistent with applicable law o warranty, expressed or implied, concerning product other than indicated on the label all risk of use and/or handling of this material se and/or handling is contrary to label 0.7 ounces 8 grams)

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 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: This product may be used in and around homes, industrial, commercial, agricultural and public building, food processing facilities and similar man-made structures. May also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product may also be used in alleys.

Non-urban Areas: This product may only be used inside of homes and agricultural, industrial and commercial 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.

individually-wrapped blocks:

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Mouse only wrapped block option:

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or more

KILLS HOUSE MICE
HOUSE MICE CAN CONSUME A LETHAL
OSE IN ONE NIGHT'S FEEDING WITH FIRST
DEAD MICE APPEARING FOLID CO.

EPA Est. No. 7173-WI-1

EPA Reg. No. 7173-236

KEEP OUT OF

EEP OUT OF REACH OF CHILDREN
PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

For retail sale as individual, wrapped blocks, or in outer package

PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. If swallowed, 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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Have this label with you when obtaining treatment

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STORAGE AND DISPOSAL

This is a nonrefillable container

Storage: Store in original container in a cool, dry place inaccessible to children and pets.

Disposal: If empty: Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place the product down any indoor or outdoor drawn. unused product down any indoor or outdoor drain.

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EPA Reg. No. 7173-236

EPA Est. No. 7173-WI-1

DIFETHIALONE **MINI BLOCKS**

KILLS HOUSE MICE

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	 	. 0.005%
Active Ingredient: difethialone Inert Ingredients	 	99,995% 100,000%
rotar	 	100.00

KEEP OUT OF REACH OF CHILDREN CAUTION

See side panel for additional precautionary statements.

Net Weight:

0.7 ounces (1 x 20 gram blocks)

50 pounds (approx. 1134 x 20 gram blocks)

LIPH/TECH

Liphatech, Inc. 3600 W. Elm Street Milwaukee, WI 53209 414-351-1476

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.

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Replace contaminated or spoiled bait Collect and dispose of all visible dead Follow-up: immediately. 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.

Optional marketing statements: Contains bittering agent

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



Alternate warranty statements:

Satisfaction guaranteed or your money back.