

7173-239

07/26/2007

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 26, 2007

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

Attention: Ms. Rachel M. Callies

Subject: Difethialone Block
EPA Reg. No. 7173-239
Your letter of March 16 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" to read, "This product may **only** be used to control Norway rats, roof rats and house mice."
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. Under "MICE", delete "Two pieces may be needed at points of very high mouse activity." as 4oz of bait is excessive. Our current maximum placement for mice is 2 oz.

- 4. Under "For sewer", revise the last sentence to read: "Place at least one entire bait block per manhole." The proposed sentence, a departure from the previously accepted label, "Place at least 15 bait blocks per manhole." would be excessive and unacceptable."

Note: In the future, include an Amended Application Form (EPA Form 8570-1) when amending the labeling of a product.

**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
Location**

Stamped Label
Dan Peacock, Flash Drive, 2gb, P:\Documents\Word, WP, Excel, etc\Difethialone\7173-239, 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. Wear gloves when handling bait or dead animals. 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.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. This is a nonrefillable container.

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: Do not reuse or refill this container. Offer for recycling if available or 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: 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. 7173-239 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.

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.

Alternate warranty statements:

Satisfaction guaranteed or your money back.

DIFETHIALONE BLOCK

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%
Inert Ingredients 99.995%
Total 100.000%

KEEP OUT OF REACH OF CHILDREN CAUTION

See side panel for additional precautionary statements.

Net Weight:

12 ounces

ACCEPTED with COMMENTS to EPA Label

JUL 26 2007

Under the Federal Insecticide, Fungicide, and Rodenticide Act

as amended, for the pesticide LIPHATECH, Inc. 3600 W. Elm Street Milwaukee, WI 53209 414-351-1476

7173-239

Optional marketing statements:

*Contains bittering agent

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



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 hooved 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 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.

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: May only be used inside of homes, 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.

APPLICATION DIRECTIONS:

(Qualifier statement for 12 oz block:)

This package contains enough bait (12 oz.) to kill 3 to 12 rats.

Each bait block is scored to be broken into 2-oz. pieces.

Mice: Apply one 2-oz. piece of block per placement, usually spaced 8 to 12 feet apart. Two pieces may be needed at points of very high mouse activity. Maintain a constant supply of fresh bait for 15 days or until signs of mouse activity cease.

Rats: Apply two to eight 2-oz. pieces of block 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.

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. Wearing gloves, collect and dispose of all visible dead animals and leftover bait as well as any bait that has become accessible to non-target animals. 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.