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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

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November 10, 2005

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

Attention: Mr. Thomas J. Schmit

Subject Rozol Mini Blocks

EPA Reg. No. 7173-243

Your submissions of March 8, July 12, August 12, and September 1, 2005

Purpose These submissions, under section 3 of the Federal Insecticide, Fungicide, and

> Rodenticide Act (FIFRA), include A) storage and stability data required as a condition of registration; B) a revised Confidential Statement of Formula (CSF)

dated August 12, 2005, which deleted several inert ingredients from your

formula; and revised labeling.

Chemistry Data

We have reviewed the storage and stability data (MRID No. 464944-01)

required as a condition of registration and found them acceptable.

CSF Your CSF of August 12, 2005, deleting four inert ingredients in your formula,

is acceptable. We have placed a copy of this CSF in our files for this product.

All other versions are obsolete.

The labeling submitted with the above letter, under the Federal Insecticide, Labeling

> Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided that you submit one (1) copy of final printed labeling to us, with the following changes,

before you ship your product.

1. Under "USE DIRECTIONS":, delete the following sentence

that greatly expands the use of this product:

This product is especially well suited for use in wet or damp areas, including river banks, gullies, irrigation ditches, railroad tracks, loading areas, under granaries, along fence lines and buffer strips, garbage dumps and landfills.

Labelingcontinued 2. Replace the above text with that approved on the last accepted label of February 14, 2005:

Applications "around" buildings must be in tamperresistant bait stations placed along the walls or other external parts of buildings (doorways, ramps, loading docks) where rats or mice might seek to gain entrance.

Existing stocks

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

Consequence for non-compliance

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

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,

19BP

Daniel B. Peacock, Biologist Insecticide-Rodenticide Branch Registration Division (7504C)

Enclosure

Stamped Label

Location

Dan Peacock, USB 512MB Flash Drive 1, F:\1-7-2005 Backup\Dan's Office Work\A Flash Drive 1\Chlorophacinone\7173-243, revised CSF, delete inerts, 11-08-2005,.doc

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PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

CAUTION: Keep away from children, domestic animals and pets. May be harmful if swallowed or absorbed animals and pets. May be narmal if swallowed or absorbed through the skin because it may reduce the clotting ability of blood and cause bleeding. Do not get in eyes, on skin or on clothing. Wear gloves when handling bait or retrieving 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

in swantowed. Can a possion continuous miner or occuprimendiately for treatment advice.

If in eyes: Hold eye open and rinse slowly and gantly with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a

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 chlorophacinone, an anticoagulant. For humans or dogs that have ingested this product, or have obvious poisoning symptoms (bleeding) or prolonged protitomethic 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 Store in original container in a cool, dry place Storage: Store in original containaccessible 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 landfull, 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 when such use and/or handling is contrary to label instructions.

EPA Reg. No. 7173-243 EPA Est. No. 7173-WI-1

Product No. Label No.

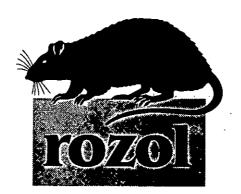
Alternate "Storage and Disposal" statement for packaging intended solely for household use:

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.



MINI BLOCKS

FOR INDOOR AND OUTDOOR USE

KILLS HOUSE MICE. NORWAY RATS, AND ROOF RATS

Active Ingredient: chlorophacinone	
Inert Ingredients	. 99,995%
Total	. 100.000%

KEEP OUT OF REACH OF CHILDREN

CAUTION: See side panel for additional precautionary statements.

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

Net Weight:

4 ounces (4 x 1 ounce blocks) 6 ounces (6 x 1 ounce blocks) 8 ounces (8 x 1 ounce blocks) 10 ounces (10 x 1 ounce blocks) or bulk package containing 1 pound Appropriate pounds with COMMENTS

in EPA Letter Dated: NOV 10 2005

Under the Federal Insecticide. Pungicide, and Rottenticide Act as amended, for the pesticide registered under EPA Reg. No. 7173-243

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.

MPORTANT: 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 hait strings are a dail can be snaken from stations when they are lined, units must be secured or otherwise limboblized. Even stronger bail 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 labet.

bait as specified on this label.

USE RESTRICTIONS: This product may be used to control Norway rats, roof rats and house mice in and around homes, industrial, commercial, agricultural and public buildings. It may also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product is especially well suited for use in areas such as river banks, guillies, irrigation disches, ratroad tracks, loading areas, under granaries, along fence lines and buffer strips, garbage dumps and landfills.

Do not place bait where it may contaminate lood or surfaces that come in direct contact with food. Do not apply bait directly to ground surface or in grass or other ground cover. Where necessary, apply in tamper-resistanct best stations to prevent non-target animals from accessing the bait. Do not broadcast bait.

tamper-resistance oan stations to prevent non-earget anamais from accessing the bair. Do not broadcast bair.

Selection of Treatment Areas: Determine areas where rats or mice are likely to find and consume bair, such as along walls, by grawed openings, in or beside burrows, in corners and concealed places, between floors or walls, or locations where rodents or their signs are seen. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

(Qualifier statement only for package containing 4 blocks:) This package contains enough bait (4 oz.) to kill 1 to 3 rats. (Qualifier statement only for package containing 6 blocks:) This package contains enough bait (6 oz.) to loll 2 to 5 rats. (Qualifier statement only for package containing 8 blocks:) This package contains enough ball (8 oz.) to kill 3 to 8 rats.

(Qualifier statement only for package containing 10 blocks:) This package contains enough bait (10 oz.) to kill 4 to 10 rats.

Inis package contains enough bait (10 oz.) to kill 4 to 10 rats.

Mice: Apply one block per placement. Two blocks may be needed at points of extremely high mouse activity. Space placements at 8 to 12 feet apart. Maintain an uninterrupted supply of fresh bait for 15 days or until signs of mouse activity casus. Pats: Apply 4 to 16 blocks per placement, usually spaced 15 to 30 feet apart. Maintain an uninterrupted supply of fresh bait for 10 days or until signs of rat 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 does occur, repeat treatment. For a continuous infestation, set up permanent bait stations and replenish bait as needed. (2005)