

7173-249

03/29/2007

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 29, 2007

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

300-3373208

Attention: Rachel M. Callies
Subject Maki Paraffin Block II
EPA Reg. No. 7173-249

Amendment to update the label with burrow and sewer claims, and expand the CSF dated December 6, 2006.

Data We have reviewed the data on a weathered formula (MRID No. 469681-01 and 469681-02 and found them acceptable.

1. In the future, submit **all raw data** for bait composition, formulations, rat and mouse bait spillage, and daily consumption for all animals.
2. Provide the size, shape, and composition of all test bait. Photos and measurements are helpful, plus the formulation method and extruder type (if any).
3. Provide a copy of LiphaTech's "Study Animal Selection, Identification, and Preparation" SOP with future data submissions.

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 changes, before you ship your product.

1. In your "WARRANTY", begin the text with "To the extent consistent with applicable law, seller ..."
2. Add "Wearing gloves" in "Follow-up" before "collect and dispose ..."

Existing stocks Stocks of 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.

CSF

You justified your additional formula on the basis that the dye had been approved in "Criteria & Policy Notice 2164.2". However, we were unable to verify that assertion. The background paper supporting the Notice concluded that your proposed dye produced important negative efficacy effects.

Because we located other products for which we had approved formulas with your proposed dye, we will not object to its presence in this product at this time. However, if you intend to use this dye in other products or plan to continue its use in products where it has already been approved, you need to conduct a comparative study with albino rats to determine the effect of this dye on efficacy. Also, we need to know the registration number and MRID No. of any test conducted with this dye.

Questions

If you have any questions or comments about this letter, please contact me at 703-605-0716 (by phone), 703-305-6920 (by fax), or mccann.geri@epa.gov (by E-Mail).

Sincerely,



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

Enclosure

Stamped Label

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DIRECTIONS FOR USE

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

Non-urban areas: May be used inside of homes and agricultural, industrial and commercial buildings.

SELECTION OF TREATMENT AREAS: Determine areas where rats and/or mice will most likely find and consume the bait. Generally, these are along walls, by gnawed openings, in corners and concealed places, between floors or walls, in burrows and sewers, or in locations where rodents or their signs have been seen. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

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

(Qualifier statement for package containing 12 ounce block.)
This package contains enough bait (12 oz.) to kill 3 to 12 rats.

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

Rats: Apply two to eight 2 oz. pieces per placement, usually spaced 15 to 30 feet apart. Maintain a constant supply of fresh bait for at least 10 days or until signs of rat activity cease.

For rat burrows, insert one or two 2 oz pieces deep into each active burrow. Check treated burrows each morning and evening to make sure that bait has not been pushed out of burrows.

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 one entire bait block per manhole.

Follow-up: Replace contaminated or spoiled bait immediately. Collect and dispose of all 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, reinfestation stations and replenish bait as needed.

(34006)

MAKI

PARAFFIN BLOCK II

FOR INDOOR AND OUTDOOR URBAN RODENT CONTROL

KILLS NORWAY RATS, ROOF RATS, HOUSE MICE AND 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%
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 (340g) or 1 pound

LIPHATECH™

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

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



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Product label for EPA Reg. No. 7173-249,
Submitted 12/6/6

AGREEMENT
with COMMENTS
In EPA Letter Dated:

MAR 29 2007

EPA Reg. No. 7173-249
Product label for EPA Reg. No. 7173-249,
Submitted 12/6/6

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 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. 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.

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 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, 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.

EPA Reg. No. 7173-249

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 or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.