

7173-251

06/28/2007

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

June 28, 2007

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1165  
5-810314

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

Attention: Mr. Thomas J. Schmit

**Subject**        **Rozol Paraffin Block**  
                      **EPA Reg. No. 7173-251**  
                      **Your letter of March 27, 2007**

**Purpose**         This submission proposes to revise the qualifier statement for the 12 oz size, under sec 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

**Review**        We have considered your request to revise the qualifier statement of the 12 oz size from "3-6 rats" to "3-12 rats" and found it to be acceptable.

However, as required by 40 CFR 162.10(a)(2), *Prominence and legibility*, all text must be clearly legible to a person with normal vision (i), set in 6-point or larger type (ii)(A) and not "obscured or crowded" (ii)(C). See Enclosure 4.

The submitted versions of your label were not clearly legible. You need to increase the type size of your minimum text and increase the spacing between characters, as you have recently done successfully for other of your products.

We also must image your labels and post them to the internet. Attached is a copy of the label previously submitted and approved for this product March 5, 2007. It was set in the same size and style of type (Enclosure 3). You will note that such an image is not clearly readable.

For these reasons, we have magnified the submitted label by 1.10% to increase readability.

**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. increase the minimum type size of characters and the spacing between characters of your text to make it clearly readable.  
See Enclosure 2, Minimum Type Size for Final Printed Labels.

**Existing stocks Forms** Stocks of product 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 (phone); 703-305-6596 (fax); or [peacock.dan@epa.gov](mailto:peacock.dan@epa.gov) (E-Mail).

Sincerely,



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

**Attachments**

1. Stamped Label
2. Minimum Type Sizes for Final Printed Labels
3. Imaged Label from EPA Website Accepted March 5, 2007
4. 40 CFR 156.10(a)(2)

**File Location** Dan Peacock, Flash Drive, 2gb, P:\Documents\Word, WP, Excel, etc\Chlorophacinone\7173-251, rev label, rev qual state, inc pt size, 6-28-2007.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 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 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 chlorophacinone, an anticoagulant. For humans or dogs that have ingested this product, or have obvious poisoning symptoms (bleeding) or prolonged prothrombin times, give Vitamin K<sub>1</sub> 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.  
 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:** 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. 7173-251- Product No.  
 EPA Est. No. 7173-WI-1 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 for disposal instructions. Never place unused product down any indoor or outdoor drain.



# Paraffin Block

**FOR INDOOR AND OUTDOOR USE**

**KILLS HOUSE MICE,  
 NORWAY RATS, AND ROOF RATS**

Active Ingredient: chlorophacinone .....	0.005%
Inert Ingredients .....	99.995%
Total .....	100.000%

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION:** See side panel for additional precautionary statements.

**LIPHATECH**  
 Liphatech, Inc.  
 3600 W. Elm Street  
 Milwaukee, WI 53209  
 (800) 351-1476

**ACCEPTED Net Weight:**  
 with COMMENTS  
 to EPA Letter Dated or  
**JUN 28 12 00 PM '07**  
 2 ounces (340g)

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 amended for the pesticide  
 registered under EPA Reg. No.  
 7173-251

**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.  
 For information on this product (including health concerns, medical emergencies or pesticide incidents) call the National Pesticide Information Center at 1-800-858-7378.

**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 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 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.  
 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 apply bait directly to ground surface or in grass or other ground cover. Where necessary, apply in tamper-resistant bait stations to prevent non-target animals from accessing the bait. Do not broadcast bait.

**Selection of Treatment Areas:** Determine areas where rats or mice are likely to find and consume bait, such as along walls, by gnawed 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 12oz blocks.)  
 One 12-ounce bait block provides enough bait to kill 3 to 12 rats.

Each block is scored to be broken into 2 oz. pieces.  
**Mice:** Break block and apply one 2 oz. piece per placement, usually spaced 8 to 12 feet apart. Maintain an uninterrupted supply of fresh bait for 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 an uninterrupted supply of fresh bait for 10 days or until signs of rat activity cease.

**For rat burrows,** insert 1 to 2 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 block and the other end to a stationary structure such as the bottom step of a 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 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. (08607)

Alternate warranty statements:  
 Satisfaction guaranteed or your money back.

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