

7173-284

03/25/2009

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

March 25, 2009

$$\frac{300}{1165} \quad \frac{5-847263}{1360} \quad \frac{332}{836749}$$
  
Decision # 391494      Decision # 400463

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

Attention: Ms. Rachel M. Callies

**Subject: Difethialone 12g Mini Blocks**  
**EPA Reg. No. 7173-284**  
**Your amended application of March 12, 2008**  
**Your resubmission of September 12, 2008**  
**Your Notification/Amendment of September 1, 2008**

**Purpose**      The purpose of your submission of March 12, 2008, is to revise the labeling for this product to remove any labeling on individually wrapped blocks, under section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

**Notification**      Your Notification of September 1, 2008, was unacceptable because you have added marketing claims to your label. Therefore, we are reviewing this submission as a label amendment. Labeling comments refer to both submissions referred to above.

**Label**      **General Comment:**  
Now that the Agency has issued its May 28, 2008, "Risk Mitigation Decision for 10 Rodenticides", it will begin to re-register products subject to 1998 Rodenticide Cluster RED, and to require that companies revise the product labeling to be consistent with the RED, as amended during the past 10 years. We will also require rodenticides not subject to the RED to make similar label changes, if applicable, so that all rodenticides are consistent with current requirements and are "on a level playing field". However, any changes in labeling or "terms and conditions" only required by the Risk Mitigation Decision will be required in the schedule outlined in that document.

**Label-continued**

The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) will be acceptable, provided you submit three (3) copies of revised labeling, with the following changes, for our review:

- 1) Revise your “**CAUTION**” text under “**PRECAUTIONARY STATEMENTS**” text, wherever it occurs, as follows:

**CAUTION:** Harmful if swallowed or absorbed through the skin because it may reduce the clotting ability of blood and cause bleeding. Keep away from children, domestic animals and pets. Do not get in eyes, on skin, or on clothing. All handlers (including applicators) must wear shoes plus socks, and gloves. [Delete previous sentence for sizes 1 lb or less.] Any person who retrieves carcasses or unused bait following application of this product must wear gloves.

**User Safety Requirements**  
 Follow manufacturer’s instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

Delete “User Safety Requirements” for sizes 1 lb or less.]

Label-continued

2) Revise your "FIRST AID" and "Note To Physician or Veterinarian" text as follows:

**FIRST AID**

**HAVE LABEL WHEN OBTAINING TREATMENT ADVICE IF SWALLOWED:**

- Call a poison control center, doctor, or 1-800-858-7378<sup>1</sup> [optional] immediately for treatment advice.
- Have a 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.

**IF ON SKIN:**

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center, doctor, or 1-800-858-7378 for treatment advice.

<sup>1</sup> Also call this number for information on health concerns and pesticide incidents.

**TREATMENT FOR PET POISONING**

If animal eats bait, call veterinarian or 1-800-xxx-xxxx [optional] at once.

**NOTE TO PHYSICIAN OR VETERINARIAN**

**Anticoagulant Difethialone:** If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. **For humans or dogs** that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K<sub>1</sub> intramuscularly or orally. **For dogs**, check prothrombin times every 3 days until values return to normal (up to 30 days). In severe cases, blood transfusions may be needed.

Label-continued

- 3) Revise the second sentence of the “ENVIRONMENTAL HAZARDS” section to read as follows:

Dogs and predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait.

- 4) Follow Enclosure 1 to revise your “Storage and Disposal” texts, which must include text for sizes a) greater than 1 lb (plastic and paper) and 2) 1 lb or less.
- 5) After “**READ THIS LABEL**”, wherever it occurs, add this 2<sup>nd</sup> Sentence, “Use only for the sites, pests, and application methods described on this label.”
- 6) In the **USE RESTRICTIONS** section, replace Sentence 2 and 3 with:
 

Do not use in edible product areas of food or feed processing plants or other areas where food or feed is commercially prepared or processed. Do not contaminate food/feed or food/feed handling equipment or place near or inside ventilation duct openings.
- 7) In all versions of your labeling with rat directions, include standard directions for use for rats “in and around buildings”.
- 8) Delete the “sewer use”, wherever it occurs, as you have not shown this formula to be “weather-resistant” and the claim is not currently on the product that is identical to this one in shape and formula. Finally, given the small size of the block, it is unlikely that such a product would be appropriate for sewers.
- 9) On the Retail Consumer Label – Option 2, revise the “Application Directions” according to Enclosure 2.
- 10) On the Retail Consumer Label – Options 1 and 2, follow Enclosure 1 for “Storage and Disposal” text .
- 11) Your “Alternate Storage and Disposal Statement” for “Household Use” is unacceptable. Follow Enclosure 1. It must have a “Storage and Disposal” heading.

Label-continued

- 12) Under your alternate Warranty text, delete “safety and” so that it reads as follows: “To the extent consistent with applicable law, buyer assumes all responsibility for use not in accordance with directions.”

13) Delete "Place Pack" from the heading for the "Wrapped Mini Blocks".  
This is not a place pack product.

14) On the Front Panel of the Wrapper label, include the

- a. product name,
- b. **CAUTION: Keep Out of Reach of Children.** See carton for complete directions and precautions.
- c. "It is illegal to sell these wrapped blocks individually."
- d. "Active Ingredient: Difethialone ... 0.0025%".
- e. "EPA Reg. No. 7173-284"

The rest of the text can go on the Back Panel: net weight, registration number, company name, address, telephone number, and marketing claims (if there is room). **All text must be at least 6 pt type.**

15) We have not evaluated the validity of marketing statement, "Kill up to X mice (1 mouse for every 3 g of product in package)". When we do an evaluation, we will inform you of any labeling changes needed.

16) Delete the following marketing claims:

- i. "Can kill in 1 feeding" [Can only use the approved "Front Panel" text.
- ii. "Kill with Ortho Power" [This is a misleading, meaningless claim.]
- iii. "Powerful Ortho Killing Baits"
- iv. "Simple set and kill"
- v. "Easy placement around the home"
- vi. "Kill Mice 100% dead" [Implies 100% control.]
- vii. Kill mice and rats 100% dead" [Implies 100% control.]
- viii. "Ortho's best." and "Ortho's best solution" [Such statements are misleading at best.]
- ix. "Ready ... and die!" [Use directions do not belong with the marketing claims.]
- x. "Use inside ... appliances" unless you add the following text: "in areas inaccessible to children, pets, and nontarget wildlife or in tamper-resistant bait stations".

**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](mailto:peacock.dan@epa.gov) (by E-Mail2.).

Sincerely yours,



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

**Location** Dan Peacock, Flash Drive, , K:\4G Dan\Doc\Word\Difethialone\7173-284\7173-284, 3-12-2008 Amd\7173-284, Amd, 3-25-2009 ver 4.doc

**Enclosure 1. Storage and Disposal Texts**

**[Containers Over 1 Pound]**

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store only in original container in a cool, dry place inaccessible to children and pets. Keep containers closed and away from other chemicals.

**Pesticide Disposal:** Wastes resulting from the use of this product may be placed in trash or delivered to an approved waste disposal facility.

**Pesticide Container:** Nonrefillable container. Do not reuse or refill this container. **[Plastic:]** Triple rinse (or equivalent) then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or incineration; or if allowed by state and local authorities, by burning; if burned, stay out of smoke.

**[Paper]** Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

**[Containers 1 Pound or Less]**

**STORAGE AND DISPOSAL**

**STORAGE:** Store only in original container, in a dry place inaccessible to children and pets.

**DISPOSAL:** Nonrefillable Container. Do not reuse or refill this container.

**If empty:** Place in trash or offer for recycling if available.

**If partly filled:** Call your local solid waste agency or 1-800-CLEANUP [tel # optional] for disposal instructions. Never place unused product down any indoor or outdoor drain.

**Note:** As stated in 40CFR156.140(a)(4), a batch code must be included on the label or package for container and containment for nonrefillables.

**Enclosure 2. Revised Application Directions for Retail Consumer Label 2**

**Selection of Treatment Areas:** Focus on indoor areas, inaccessible to children and pets, where rats or mice or their droppings have been seen: along walls, between floors or walls, inside cabinets, under or behind appliances, in attics, or garages

**Removal of Alternate Food:** Store food in sealed containers and sweep up food spills.

**APPLICATION DIRECTIONS:**

[Repeat qualifier statements.]

**1. Place Blocks:**

**Mice** apply 1 block per placement, usually spaced 8 to 12 feet apart.

**Rats** apply 10 - 37 blocks per placement, usually spaced 15 to 30 feet apart.

**2. Keep Bait Fresh:** Maintain a constant supply of fresh bait for 15 days for mice and 10 days for rats, or until signs of activity has stopped.

**3. Collect and Dispose:** When rodents are eliminated, wear gloves to collect and dispose of all visible dead animals and remaining bait.

**4. Prevent Next Infestation:** To prevent another infestation, limit sources of rodent food, water, and harborage as much as possible.



9/23

Outer Carton Label for Wrapped or Unwrapped Blocks:

# DIFETHIALONE 12g 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 .....0.0025%  
Inert Ingredients ..... 99.9975%  
Total .....100.0000%

KEEP OUT OF REACH OF CHILDREN

## CAUTION:

See side panel for additional precautionary statements

ACCEPTED  
With COMMENTS  
EPA Letter Dated:

MAR 25 2009

### Net Weight:

- 3.81 ounces (9 X 12g blocks)
- 4.23 ounces (10 X 12g blocks)
- 5.08 ounces (12 X 12g blocks)
- 5.93 ounces (14 X 12g blocks)
- 6.77 ounces (16 X 12g blocks)
- 8.47 ounces (20 X 12g blocks)
- 10.58 ounces (25 X 12g blocks)
- 12.70 ounces (30 X 12g blocks)

Under the Federal Insecticide, Fungicide  
and Rodenticide Act, As amended, for the  
pesticide Registered under EPA Reg. No:

7173-284

Or

1 pound up to 50 pounds

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

007173-00284.20080910..pdf

10/23

## 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. 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. 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 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 immediately with plenty of 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 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. 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.

**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 by 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, and unused, spoiled, and unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may only 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 buildings, 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.

**APPLICATION DIRECTIONS:**

- Qualifier statement for 9 count package:* This package contains enough bait (3.81 oz.) to kill 1 rat.
- Qualifier statement for 10 count package:* This package contains enough bait (4.23 oz.) to kill 1 to 3 rats.
- Qualifier statement for 12 count package:* This package contains enough bait (5.08 oz.) to kill 1 to 5 rats.
- Qualifier statement for 15 count package:* This package contains enough bait (6.35 oz.) to kill 2 to 6 rats.
- Qualifier statement for 20 count package:* This package contains enough bait (8.47 oz.) to kill 3 to 8 rats.
- Qualifier statement for 25 count package:* This package contains enough bait (10.58 oz.) to kill 3 to 10 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 cease. **Rats:** Apply ten to thirty-seven 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.

**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 29 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 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.

EPA Reg. No. 7173-284

EPA Est. No. 7173-WI-1

12/23

Mouse Only Outer Carton Label for Wrapped or Unwrapped Blocks:

# DIFETHIALONE 12g 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 . . . . .	0.0025%
Inert Ingredients . . . . .	99.9975%
Total . . . . .	100.0000%

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION:

See side panel for additional precautionary statements.

**Net Weight:**

0.4 ounces (1 X 12 g blocks)  
up to 50 pounds

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

**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. 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. 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 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 immediately with plenty of 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 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. 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.

**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 by 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, and unused, spoiled, and unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may only be used to control 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 buildings, 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.

**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. Wearing gloves, 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.

EPA Reg. No. 7173-284  
EPA Est. No. 7173-WI-1

15/a3

Retail Consumer Label For Wrapped or Unwrapped Blocks- Option 1:

# DIFETHIALONE 12g 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 . . . . .	0.0025%
Inert Ingredients . . . . .	99.9975%
Total . . . . .	100.0000%

**KEEP OUT OF REACH OF CHILDREN**

## **CAUTION:**

See side panel for additional precautionary statements.

### **Net Weight:**

- 3.81 ounces (9 X 12g blocks)
- 4.23 ounces (10 X 12g blocks)
- 5.08 ounces (12 X 12g blocks)
- 5.93 ounces (14 X 12g blocks)
- 6.77 ounces (16 X 12g blocks)
- 8.47 ounces (20 X 12g blocks)
- 10.58 ounces (25 X 12g blocks)
- 12.70 ounces (30 X 12g blocks)

Or

1 pound

[Liphatech Logo]  
 Liphatech, Inc.  
 3600 West Elm Street  
 Milwaukee, WI 53209  
 414-351-1476

**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. 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. 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 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 immediately with plenty of 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 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**

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.

**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.



**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 by 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, and unused, spoiled, and unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may only 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. **Do not use this product in areas accessible to children pets, domestic animals or nontarget wildlife. Do not use this product outdoors.** 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 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 9 count package:* This package contains enough bait (3.81 oz.) to kill 1 rat.

*Qualifier statement for 10 count package:* This package contains enough bait (4.23 oz.) to kill 1 to 3 rats.

*Qualifier statement for 12 count package:* This package contains enough bait (5.08 oz.) to kill 1 to 5 rats.

*Qualifier statement for 15 count package:* This package contains enough bait (6.35 oz.) to kill 2 to 6 rats.

*Qualifier statement for 20 count package:* This package contains enough bait (8.47 oz.) to kill 3 to 8 rats.

*Qualifier statement for 25 count package:* This package contains enough bait (10.58 oz.) to kill 3 to 10 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 cease. **Rats:** Apply ten to thirty-seven 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 immediately. Wearing gloves, 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.

EPA Reg. No. 7173-284

EPA Est. No. 7173-WI-1

Retail Consumer Label For Wrapped or Unwrapped Blocks- Option 2:

# DIFETHIALONE 12g 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 . . . . .	0.0025%
Inert Ingredients . . . . .	99.9975%
Total . . . . .	100.0000%

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION:**

See side panel for additional precautionary statements.

**Net Weight:**

- 3.81 ounces (9 X 12g blocks)
- 4.23 ounces (10 X 12g blocks)
- 5.08 ounces (12 X 12g blocks)
- 5.93 ounces (14 X 12g blocks)
- 6.77 ounces (16 X 12g blocks)
- 8.47 ounces (20 X 12g blocks)
- 10.58 ounces (25 X 12g blocks)
- 12.70 ounces (30 X 12g blocks)

Or

1 pound

[Liphatech Logo]

Liphatech, Inc.

3600 West Elm Street

Milwaukee, WI 53209

414-351-1476

**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. 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. 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 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 immediately with plenty of 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 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**

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.

**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.

**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 by 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, and unused, spoiled, and unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may only 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. **Do not use this product in areas accessible to children pets, domestic animals or nontarget wildlife. Do not use this product outdoors.** 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 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 9 count package:* This package contains enough bait (3.81 oz.) to kill 1 rat.
- Qualifier statement for 10 count package:* This package contains enough bait (4.23 oz.) to kill 1 to 3 rats.
- Qualifier statement for 12 count package:* This package contains enough bait (5.08 oz.) to kill 1 to 5 rats.
- Qualifier statement for 15 count package:* This package contains enough bait (6.35 oz.) to kill 2 to 6 rats.
- Qualifier statement for 20 count package:* This package contains enough bait (8.47 oz.) to kill 3 to 8 rats.
- Qualifier statement for 25 count package:* This package contains enough bait (10.58 oz.) to kill 3 to 10 rats.

- 1. Clean up:** Eliminate possible rodent food sources. Store food in sealed containers and sweep up food spills.
- 2. Select Areas for Placement:** Focus on areas where rodents have been active - generally along walls, between floors or wall, inside cabinets, under appliances, in basements, attics or garages. Be sure to place out of reach of children and pets.
- 3. Place Blocks:** For mice apply 1 block per placement, usually spaced 8 to 12 feet apart. For rats apply 10 to 37 blocks per placement, usually spaced 15 to 30 feet apart.
- 4. Dispose:** Maintain a constant supply of fresh bait for 15 days for mice and 10 days for rats, or until signs of activity has stopped. When rodents are eliminated, wear gloves to collect and dispose of all visible dead animals and remaining bait.
- 5. Prevent:** To prevent another infestation, limit sources of rodent food and water as much as possible.

EPA Reg. No. 7173-284  
EPA Est. No. 7173-WI-1

**Place Pack Label to Be Used For Wrapped Mini Blocks:**

Front:

**Difethialone 12g  
Mini Blocks**

(product logo)

(marketing claims)

Back:

**KEEP OUT OF REACH OF  
CHILDREN, PETS AND  
NONTARGET ANIMALS**

**CAUTION:** See carton for complete directions and precautions. It is illegal to sell these bait packs individually.

Net Weight: 0.4 ounces (12 grams)

<b>Active Ingredient: Difethialone</b>	<b>0.0025%</b>
<b>Inert Ingredients</b>	<b>99.9975%</b>
<b>Total</b>	<b>100.0000%</b>

EPA Reg. No. 7173-284  
EPA Est. No. 81629-FRA-1  
Liphatech, Inc., Milwaukee, WI 53209  
414-351-1476

**ALTERNATE STORAGE AND DISPOSAL STATEMENT FOR PACKAGING INTENDED SOLELY FOR HOUSEHOLD USE:**

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 STATEMENT FOR ALL LABEL OPTIONS: (to be used with a header of "Warranty" or "Disclaimer")**

- To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

**ADDITIONAL WARRANTY STATEMENTS FOR ALL LABEL OPTIONS:**

- Satisfaction guaranteed or your money back.
- If for any reason you are not satisfied with this product, mail us proof of purchase to obtain full refund of your purchase.

**OPTIONAL MARKETING STATEMENTS:**

- Contains bittering agent.
- Bitrex™ is a trademark of Macfarlan Smith Ltd., Edinburgh, Scotland
- [Bitrex Logo]
- Kills up to X mice (1 mouse for every 3g of product in package)
- Can kill in 1 feeding
- Ready to use
- Easy to use
- Simple, easy to use
- Simple set and kill
- Easy placement around the home
- Use inside cabinets, in closets, garages, attics and behind or under appliances
- Use in tight spaces
- Use in tight spaces where traps can not reach
- Can be used inside or outside
- Kills rats and mice
- Kill with Ortho Power
- Powerful Ortho Killing Baits
- Kill Mice 100% dead
- Kill mice and rats 100% dead
- Kills mice and rats – dead
- Specially formulated
- Proven formula

**OPTIONAL MARKETING STATEMENTS (CONTINUED):**

- Ortho's best.
- Ortho's best solution
- **Ready:** Eliminate rodent food sources - store food in sealed containers.  
**Set:** Place out of reach of children and pets. Select tight spaces where rodents are suspected - under appliances, in cabinets, garage or attic.  
**Kill:** Rats and mice will eat [bait] and die!

**THE FOLLOWING OPTIONAL MARKETING STATEMENTS ARE TO BE USED ONLY IN CONJUNCTION WITH THE ALTERNATE WARRANTY STATEMENT**

"If for any reason you are not satisfied with this product, mail us proof of purchase to obtain full refund of your purchase."

- Ortho Guaranteed Killing Power
- Guaranteed
- Guaranteed kill
- Guaranteed Ortho Kill
- Guaranteed to Kill Mice and Rats

**MARKETING STATEMENTS TO BE USED ON OUTER PACKAGE OF INDIVIDUALLY WRAPPED BLOCKS ONLY:**

- Each bait block is individually wrapped-no need to touch the bait!
- No Touch, Reduced [Less] Mess
- Just place and wait – mice will eat through the wrapper