

7173-286

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



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

August 24, 2012

Thomas Schmit
Liphatech, Inc.
3600 West Elm Street
Milwaukee, WI 53209

Dear Mr. Schmit:

Subject: (1) Amended labeling to add mechanical application
(2) Supplemental label for mechanical application
Rozol® Prairie Dog Bait
EPA Registration No. 7173-286

The proposed labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable.

As a condition of registration you must submit within 30 days from the date of this letter requests for voluntary cancellation of any Special Local Need registrations for Rozol Prairie Dog Bait. Submit the requests to both EPA and the affected states.

Stamped copies are enclosed for your records. Please submit one copy of your final printed labeling before you release the product for shipment. Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact me by phone at: (703) 308-6249, or by email at: hebert.john@epa.gov.

Regards,

A handwritten signature in black ink, appearing to read "John Hebert", written over a large, loopy flourish.

John Hebert, PM 7
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

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RESTRICTED USE PESTICIDE
DUE TO HAZARD TO NONTARGET ORGANISMS
For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certificate.

ACCEPTED
AUG 24 2012
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide Registered under EPA Reg. No. 7173-286

ROZOL®

PRAIRIE DOG BAIT

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

EPA Reg. No. 7173-286

EPA Est. No. 7173-WI-1

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

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

Net Weight: 1 pound up to 2000 pounds

WARRANTY: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of product when such use and/or handling is contrary to label instructions.

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

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. 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.

FIRST AID: Have label 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.

If on skin: 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.

TREATMENT FOR PET POISONING: If animal eats bait, call veterinarian at once.

NOTE TO PHYSICIAN OR VETERINARIAN: Contains chlorophacinone, an anticoagulant. 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 K₁ intramuscularly or orally.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present. Do not contaminate water by cleaning of equipment or disposal of wastes. Runoff also may be hazardous to aquatic organisms in water adjacent to treated areas.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

Pesticide 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 in trash or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. **[Plastic:]** Completely empty container, then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill. **[Paper:]** Completely empty container, then dispose of empty container in trash or at an approved waste disposal facility.

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. Only use for sites, pests, and application methods specified on this label.

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. Dispose of product container, unused, spoiled and unconsumed bait as specified on this label.

Use restrictions: This product may only be used as follows:

1. **Sites/Pests:** Black-Tailed Prairie Dogs (*Cynomys ludovicianus*) on rangeland and adjacent noncrop areas.
2. **States:** Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas and Wyoming. Do not apply this product within the exterior boundaries of the Crow Reservation or the Blackfeet Reservation in Montana.

- 3. **Application Method:** Apply bait by hand scoop or a mechanical bait application machine that is designed, constructed and operated in a manner that ensures that bait is properly placed at least 6 inches down the prairie dog burrows. This product may only be used in underground applications. Do not apply bait on or above ground level. Treat only active burrows.
- 4. **Treatment Period:** Apply between October 1 and March 15 of the following year, when animals will most readily take the grain bait.
- 5. **Non-Applicators:** Do not allow children, pets, domestic animals or persons not involved in the application to be in the area where the product is being applied.
- 6. **Grazing Restriction:** Do not allow livestock to graze in treated areas for 14 days after treatment and when no bait is found above ground.
- 7. Do not use any other rodenticides containing anticoagulants (diphacinone) in prairie dog towns during the treatment period allowed on this label.

Endangered Species: It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. Use of this product may pose a hazard to endangered or threatened species. When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the county in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

Site Assessment: Before applying this product, identify active prairie dog burrows by visual observation. The openings of active burrows will generally be free of leaves, seeds, other debris or spider webs, and will show freshly turned earth, and have prairie dog feces nearby.

Application: Apply 1/4 cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. Make sure no bait is left on the soil surface at the time of application. Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance.

Follow-up: Prairie dogs that have eaten this bait will begin to die off 4 to 5 days after they eat a lethal amount. The applicator must return to the site within 4 days after bait application, and at 1 to 2 day intervals, to collect and properly dispose of any bait or dead or dying prairie dogs found on the surface. Carcass searches must be performed using a line-transect method that completely covers the baited area. Transect center lines must be not more than 200 feet (about 60 meters) apart, and should be considerably less if searches are conducted in more densely vegetated sites. Transect lines may be traveled on foot or by vehicle at a rate not to exceed 4 mph. All carcasses found above ground must be collected and disposed of properly. Continue to collect and dispose of dead or dying prairie dogs and search for non-target animals for at least two weeks, but longer if carcasses are still being found at that time. Carcass collection should occur in late afternoon, near sundown, to reduce the potential of nocturnal animals finding carcasses and dying animals. Bury carcasses on site in holes dug at least 18 inches deep or in inactive burrows (no longer being used by prairie dogs or other species) to avoid non-target animal scavenging. Burial includes covering and packing the hole or burrow with soil. If burial is not practical (due to frozen ground, etc.) and other disposal methods are allowed by state and local authorities, collected carcasses may be disposed of by other methods to insure that the carcasses are inaccessible to scavengers.

All dead or dying non-target animals must be reported to the National Pesticide Information Center 1-800-858-7378 as soon as possible. Any apparently injured or sick Federally listed species must also be immediately reported by calling 303-236-7540 (if located in Kansas, Nebraska, the Dakotas, Montana, Colorado or Wyoming) or 505-248-7889 (if located in Texas, New Mexico or Oklahoma). The Black-footed Ferret Coordinator must also be contacted if ferrets are found during Rozol Prairie Dog Bait applications or carcass searches at 970-897-2730 x224. If live black footed ferrets are found outside reintroduction sites, before, during or after Rozol Prairie Dog Bait application, the Black-footed Ferret Coordinator must be contacted immediately and sufficient time must be allowed for the FWS to capture and relocate the black-footed ferret(s) before Rozol Prairie Dog Bait application.

Reapplication: If prairie dog activity persists several weeks or months after the bait was applied, a second application may be made, by treating burrows in the same manner, time period and procedure as the first application. Follow all application, site assessment and follow-up directions and use restrictions as found above.

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RESTRICTED USE PESTICIDE
DUE TO POTENTIAL SECONDARY TOXICITY TO NONTARGET ORGANISMS
For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

SUPPLEMENTAL LABELING

rozol[®]

PRAIRIE DOG BAIT

ACCEPTED
AUG 24 2012
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide Registered under EPA Reg. No. 7173-286

SUPPLEMENTAL LABELING WITH DIRECTIONS FOR APPLICATION BY MECHANICAL BAIT PLACEMENT MACHINE

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

EPA Reg. No. 7173-286
EPA Est No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN
CAUTION: See label on or attached to the pesticide container for additional precautionary statements.

This label valid until March 15, 2014, and must not be used or distributed after that date.

All applicable directions, restrictions and precautions on the EPA registered label are to be followed. Before using Rozol Prairie Dog Bait as permitted according to this Supplemental Labeling, read and follow all applicable directions, restrictions and precautions on the EPA registered label on or attached to the pesticide container. This Supplemental Labeling contains revised use instructions and/or label restrictions that may be different from those that appear on the container label. This Supplemental Labeling must be in the possession of the user at the time of pesticide application.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use restrictions: This product may only be used in underground applications to control black-tailed prairie dogs (*Cynomys ludovicianus*) on rangeland and noncrop areas. Apply between October 1 and March 15 of the following year, when animals will most readily take the grain bait. This product is toxic to nontarget wildlife and fish. Do not allow bait to be placed outside of the prairie dog burrow. Do not allow children, pets, domestic animals or persons not involved in the application to be in the area where the product is being applied. Do not allow livestock to graze in treated areas for 14 days after treatment and when no bait is found above ground. Before applying this product, identify active prairie dog burrows by visual observation. The openings of active burrows will generally be free of leaves, seeds, other debris or spider webs, and will show freshly turned earth, and have prairie dog feces nearby.

Application: Apply 1/4 cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. Application may be made with a mechanical bait application machine that is designed, constructed and operated in a manner that ensures that bait is properly placed at least 6 inches down the prairie dog burrows. **Make sure no bait is left on the soil surface at the time of application.** Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance. Mechanical bait application machines must be calibrated to ensure that the proper amount of bait is dispensed into each prairie dog burrow.

Follow-up: The applicator must return to the site within 4 days after bait application, and at 1 to 2 day intervals, to collect and properly dispose of any bait or dead or dying prairie dogs found on the surface. The applicator must follow all label instructions for conducting carcass searches, proper disposal of carcasses, and reapplication. (081712)

LIPHATECH

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