UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

345,5405891

26 JUN 1992

Mr. Joseph E. Dyer PITMAN-MOORE INC. 1201 Douglas Avenue Kansas City, KS 66103

Dear Mr. Dyer:

Subject: NOMINAL CONCENTRATION, DRAFT LABELING AND

APPLICATION FOR UPDATED CSF'S

Prolate 1E Emulsifiable

EPA Registration Number 59-235

Your Application Dated October 18, 1991 and

Facsimile Submission Received On October 22, 1991

The labeling and confidential statement of formulas (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, is acceptable, provided that you make the following labeling changes listed below before you release the product for shipment bearing the amended labeling:

- 1). In regard to the labeling, change the percent active ingredient to 11.6%.
- 2). In response to your question regarding nominal concentration. The nominal claim of 11.60% allows certified limits of + or 5% added to the nominal, which makes the standard Certified Limits as follows:
 - \star Lower Limit = 11.6% (5%) x (11.6%) = 11.02%
 - # Upper Limit = 11.6% + (5%) x (11.6%) = 12.18%

As long as the label claim is 11.6% active ingredient and the Certified Limits remain within the standard range there is no need to submit additional data for minor changes within the range. If the Certified Limits violate the standard and/or the label claim changes, the product must be amended and data submitted. The data requirements will depend on the degree of changes and how the profile of your product is effected (i.e. efficacy and precautionary category).

	CONCURREN	CES		
SYMBOL) H7505C				
SURNAME A. LEYLING			***********	}
DATE 1 6/26/92				
	<u> </u>		 0.000	

EPA Form 1320-1A (1/90)

Printed on Recycled Paper

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- 3). In reference to the CSFs (basic and alternate formulation), please provide the following information:
 - a. The upper and lower Certified Limits based on the pure active ingredients.
 - b. Correct the source product as per ICI Americas letter dated May 20, 1992 as follows:

★ In column number 10 of the CSF, the product's name should be "PROLATE Technical Livestock Insecticide, etc...".

★ In column n. ber 12 of the CSF, the source product's EPA registration number should be "10182-233".

c. The lower Certified Limit should be lower than (13b) % by weight when in pure active form, and upper certified Limit should be higher than 13b, and should be reported in pure active ingredient form.

Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca Product Manager (13) Insecticide-Rodenticide Branch Registration Division (H7505C)

Enclosure:

DRAFT LABEL

PRODUCT NAME: Prolate 1E EMULSIFIABLE LIQUID

October 24, 1991 SUPERSEDES: March 11,1991 DATE:

ITEM: Container Label

Coopers Animal Health Inc. COMPANY: COUNTRY: USA

REASON TO ISSUE: To update label per EPA letter dated 8/13/91

and per PR Notice 91-2 "Accuracy of Stated Percentages for

Ingredients Statement"

PREPARED BY: Joseph E. er, Reg. Affairs, Kansas City (Refer to 40 CFR for US/EPA type size requirements. Refer to US/EPA Pesticide Regulation Notice 83-3 for container disposal text appropriate for container size and material.

(A:JED7100.DOC)

MAIN (FRONT) PANEL

PROLATE 1E

EMULSIFIABLE LIQUID

A BEEF AND NON-LACTATING DAIRY CATTLE INSECTICIDE FOR THE CONTROL OF LICE, CATTLE TICKS, SOUTHERN CATTLE TICKS, WINTER TICKS, LONE STAR TICKS, GULF COAST EAR TICKS, HORNFLIES, SARCOPTIC MANGE AND SCABIES MITES

AND

A SWINE INSECTICIDE FOR CONTROL OF LICE AND SARCOPTIC MANGE

For use on cattle and swine only. Not for use on horses, sheep or goats.

ACTIVE INGREDIENTS:

N-(mercaptomethyl) phthalimide

S-(O,O-dimethyl phosphorodithioate..... 11.7%

INERT INGREDIENTS:..... 88.3% TOTAL 100.0% wt./wt.

Contains 1 pound Active Ingredient Per Gallon EPA Regis. No. 59-235 EPA Est. No. 6175-LA-1

WARNING

KEEP OUT OF REACH OF CHILDREN

ACCEPTED. with COMMENTS in EPA Letter Dated

See Other Precautions on Side Panels Read All Directions Before "sing This Product

Net Contents: 1 US Gallon (128 US oz.)

Coopers Animal Health Inc. J201 Douglas Avenue Kansas City, Kansas 66103-1438 USA (label number)

PROLATE is a registered trademark of Coopers Animal Health Inc.

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.26. JUN 1992

Under the Federal darecticide Furgicide, and Rodentfiele Ac as an enceded, for the pesticide registered under EPA Beg. No.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

Causes eye and skin irritation. Do not get in eyes, on skin or on clothing. Harmful if swallowed. Avoid breathing spray mist. Applicators must wear long-sleeved shirt, long pants, elbow length waterproof gloves, waterproof apron and unlined waterproof boots. Wash all contaminated clothing with soap and hot water before re-use. Wash thoroughly before eating, drinking or using tobacco.

STATEMENT OF PRACTICAL TREATMENT:

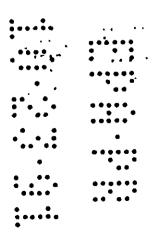
IF IN EYES - Rinse immediately with plenty of water. Call a physician immediately. IF ON SKIN - Wash promptly with soap and water. Remove contaminated clothing. IF SWALLOWED - Call a physician or Poison Control Center immediately. Do not induce somiting. IF SPRAY MIST IS INHALED - Remove to fresh air. Apply artificial respiration if indicated.

NOTE TO PHYSICIAN AND VETERINARIAN: Prolate lE is an organophosphate insecticide and a cholinesterase inhibitor. If signs of cholinesterase inhibition are present, atropine is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine. If ingested do not induce vomiting as this may induce an aspiration hazard. Usual symptoms of organophosphate poisoning in man include: headache, blurred vision, weakness, nausea, discomfort in the chest, vomiting, abdominal cramps, diarrhea, salivation, sweating, pin-point pupils. Usual symptoms of poisoning in animals include salivation, labored breathing, loss of balance, staggering and pin-point pupils.

ENVIRONMENTAL HAZARDS: This pesticide is extremely toxic to fish. Do not apply directly to water, to areas where surface water is present or to interidale areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Drift or runoff from treated areas may be hazardous to aquatic organisms in neighboring areas.

PHYSICAL OR CHEMICAL HAZARDS: Do not use or store near heat or open flame. Protect from temperatures below 20 degrees F.

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DIRECTIONS FOR USE

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

BEEF AND NON LACTATING DAIRY CATTLE Do not treat non-lactating dairy cattle within 28 days of freshening.

See Table For Feedlot Use Only Provision

To Control	Method To Use	Dilution Feedlot Use Only 21 - Day Pre-slaughter Interval	on Rate y General Use 3 - Day Pre-slaughter Interval
Lice	Dip Spray	1:60 1:49	1:150
Hornflies	Dip Spray	1:60 1:49	1:260
Scabies Mites (For control of scare required.)	Dip abies mites, to	1:60 wo treatments, 10	-14 days apart
Sarcoptic Mange	Dip Spray	1:60 1:49	1:100
Cattle Ticks	Dip Spray	1:60 1:49	1:240
Southern Cattle Ticks	Dip Spray	1:60 1:49	1:240
Winter Ticks	Dip Spray	1:60 1:49	1:100
Lone Star Ticks	Dip Spray	1:60 1.49	1:100
Gulf Coast Ear Ticks	Dip Spray	1:60 1:49	1:100
To Control	SWI! Method To Use	Dil 1 Day	ution Rate Pre-slaughter nterval
Lice	Spray	1:4	9 or 1:100
Sarcoptic Mange	Spray	1:4	9 or 1:106

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DIP VAT CHARGING PROCEDURE
Prior to charging vat, empty out old contents and thoroughly
clean the vat. Add water to the vat. Add Prolate 1E at a rate
of 1 gallon to each 60 or 240 gallons of water. See Storage and
Disposal statements on this label.

Important: Add super phosphate at a rate of 100 pounds per 1000 gallons of vat solution. Super phosphate is added to control the pH of the solution and to insure vat stability. Super phosphate is usually available at most fertilizer dealers as 0-45-0 or 0-46-0.

Stir the vat thoroughly, preferable with a compressed air device; however, any form of thorough mixing is adequate since Prolate 1E emulsifies readily.

Restir vat contents prior to each use.

DIP VAT REPLENISHMENT

During the dipping operation, each time the vat's volume is reduced by 1/8 to 1/4 of its original volume, replenish the vat as follows:

Replenish vat with water and add Prolate 1E at a rate of 1 gallon for each 50 or 200 gallons of water added.

Important: Add super phosphate as necessary to maintain pH between 4.5 and 6.5. Stir well and resume dipping. Repeat replenishment process as necessary. For evaporation add additional water accordingly. For added water due to rainfall, merely replenish vat with Prolate 1E according to label directions.

DIP VAT MAINTENANCE

When utilizing the Prolate 1E Field Test Kit dipping may continue as long as the Prolate concentration is maintained and adjusted between 0.15% and 0.25% for the 1:60 dilution or 0.02% and 0.05% for the 1:240 dilution, and the vat is not too foul for satisfactory use as indicated by foul odor or excessive darkening of solution. Refer to U.S.D.A.V.S. Memorandum 556.9 for use of the Field Test Kit. Information on availability of the Field Test Kit may be obtained from your Coopers/Pitman-Moore representative.

When not utilizing the Prolate 1E Field Test Kit the vat . Unld be emptied, cleaned and recharged each time one of the following occurs:

- 1. When the vat has been charged for 120 days.
- When the dip becomes too foul for satisfactory use within 120 day limit.
- 3. If the number of animals dipped equals twice the humber of gallons of the initial batch values within the 120 day limit.

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SPPAY METHOD: CATTLE AND SWINE

At the 1:49 dilution rate, mix one gallon of Prolate 1E with 49 gallons of water and stir thoroughly. Apply the fresh mixture as a high-gressure spray, taking care to wet the skin, not just the hair. Apply to the point of runoff. For cattle, do not apply within 21 days of slaughter. For swine, do not apply within 1 day of slaughter.

At the 1:100 dilution rate, the 1:150 dilution rate, or the 1:200 dilution rate mix one gallon of Prolate 1E with 100 gallons, 150 gallons or 200 gallons of water respectively, and stir thoroughly. Apply as directed for the 1:49 dilution rate. For cattle do not apply within 3 days of slaughter. For swine, do not apply within 1 day of slaughter.

BACKRUBBERS - CATTLE

To control hornflies on beef cattle, dilute 1 gallon Prolate 1E in 50 gallons fuel oil or other suitable carrier and charge backrubber device or soak sack or cloth as required. Retreat backrubber as needed.

OFFICIAL ERADICATION PROGRAM

Where Prolate IE is recommended in federal or state eradication programs, it is required that specific use directions be followed. Consult state or federal authorities for detailed recommendations. Consult the Animal and Plant Health Inspection Service, Veterinary Services.

WARNINGS

- 1. Prolate lE is a cholinesterase inhibitor. Do not use this product on animals simultaneously or within a few days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides or chemicals. Atropine is antidotal. Consult veterinarian at first sign of adverse reaction.
- 2. Cattle may be slaughtered 21 days after treatment at a dip rate of 1:60 or a spray rate of 1:49. Cattle treated at a spray rate of 1:100, 1:150 or 1:200 or dip rate of 1:240 may be slaughtered 3 days after treatment.
- 3. Swine may be slaughtered one day after treatment.
- 4. In swine, single applications for lice and sarcoptic mange control are usually effective however, should a second application be necessary, it may be made 14 days following first treatment.
- 5. For swine: do not treat sick, convalescent, or stressed animals. Do not apply directly to suckling pigs.
- 6. For cattle: do not treat sick convalescent, stressed, or animals less than 3 months old except in federal or state. Anadication programs where immediate treatment of all animals in an infested herd is mandatory. Hand dipping of young animals will prevent swallowing of dip solution.

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- 7. Do not treat non-lactating dairy cattle within 28 days of freshening. If freshening should occur within the 28 day period after treatment that milk must not be used as human food.
- 8. Be sure free access to drinking water is available to cattle prior to dipping. Do not dip excessively thirsty or overheated animals. Following dipping, allow animals adequate space and ventilation to thoroughly dry. Do not allow animals to become crowded or overheated.
- 9. IMPORTANT: In cattle, repeat treatment as necessary, but not more often than every 7-10 days. Treatment for lice, ticks, scabies mites, sarcoptic mange, and hornflies may be made any time of the year except when cattle grub larvae are in the gullet or spinal canal. Consult your veterinarian, extension livestock specialist or extension entomologist regarding timing of treatment.

STORAGE AND DISPOSAL

Pesticide Disposal - Do not contaminate water, food, or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Metal Container Disposal - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Plastic Container Disposal - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture an dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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