



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 23, 2006

Sherry Purcell, Regulatory Specialist
Farnam Companies
PO Box 34820
Phoenix AZ. 85067

Subject: Draft Label in response to Agency letter dated December 1, 2004.
EPA Registration Number: 270-165
Product Name: FARNAM VITA-PLUS WITH EQUITROL
Date of Submission: January 7, 2005

Dear Ms. Purcell;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Page 2 of 6:

a. Revise the "FIRST AID" section of the label as follows:

“

FIRST AID Organophosphate	
If swallowed	<ul style="list-style-type: none"> • Call 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 on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for further treatment advice.
If in eyes	<ul style="list-style-type: none"> • 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.
HOTLINE NUMBER {Organophosphate}	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment You may also contact toll free: (800) 234-2269 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
This product is a cholinesterase inhibitor, if symptoms of cholinesterase inhibition are present; atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine. Product may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage.	

b. Revise the Personal Protective Equipment section of the label as follows:

“Personal Protective Equipment (PPE)

“Some materials that are chemical-resistant to this product are”¹“If you want more options, follow the instructions for category”²“on an EPA chemical-resistance category selection chart.

Loaders, applicators and other handlers must wear:

- long-sleeved shirt and long pants,
- shoes plus socks
- chemical resistant gloves”

c. Revise the “Environmental Hazards” revising the text below the header as follows:

“ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high-water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wastewater or rinsate.”

2. Page 4 of 6:

a. Revise the subheader “GENERAL PRECAUTIONS AND RESTRICTIONS” to “USE RESTRICTIONS”

Additionally, place the various use restrictions below in bullet format as follows:

“USE RESTRICTIONS

- Do not apply this product in a way that will contact workers or other persons, either directly or through drift.
- Only protected handlers may be in the area during application.
- Do not use on horses intended for slaughter.
- Do not add feed of higher levels of this premix containing Selenium.

b. Directly above the subsection starting with “This product contains tetrachlorvinphos, which is a cholinesterase inhibitor.” Insert a new subheader as follows:

“USE PRECAUTIONS FOR HORSES”

¹ (Registrant inserts correct chemical-resistant material).

² [Registrant inserts A,B,C,D,E,F,G,or H]

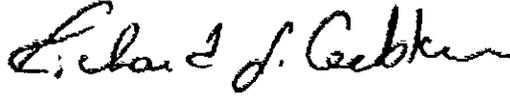
3. Page 6 of 6:

- a. Revise the subheader "DIRECTIONS FOR USE (Application Instructions)" to "DAILY FEEDING LEVELS"

The Directions for Use header already exists on page 3.

If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



George LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

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ACCEPTED
with COMMENTS
In EPA Letter Dated

FARNAM
VITA PLUS®
WITH EQUITROL®

JUN 23 2006
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
270-165

FEED-THRU FLY CONTROL

Now contains Equitrol® Feed thru fly control to prevent the development of
Stable Flies and Houseflies in the manure of treated horses
The Nutritional Feed Supplement for All Classes of Horses
Vitamins · Minerals · Amino Acids · Selenium · Coat Conditioner
With EQUITROL® Feed-Thru Fly Control

ACTIVE INGREDIENT

Tetrachlorvinphos: (CAS #961-11-5).....	1.234%*
OTHER INGREDIENTS	98.766%**
TOTAL	100.000%

*Contains 5.597 g RABON® per pound.
**Refers only to ingredients which are not larvicidal.

FEED INGREDIENTS

Wheat Middlings, Dehydrated Alfalfa Meal, Wheat Germ Meal, Molasses, Corn, Dicalcium Phosphate, Salt, Dried Whey, Vitamin A Supplement, Vitamin D₃ Supplement, Vitamin E Supplement, Vitamin B₁₂ Supplement, Riboflavin Supplement, Niacin, Calcium Pantothenate, Choline Chloride, Thiamine Mononitrate, Pyridoxide Hydrochloride (Vitamin B₆), Sodium Selenite, L Lysine Hydrochloride, dL-Methionine, Zinc Amino Acid Chelate, Manganese Amino Acid Chelate, Iron Amino Acid Chelate, Copper Amino Acid Chelate, Iodine Amino Acid Chelate, and Cobalt Amino Acid Chelate, Magnesium Sulfate, Potassium Chloride, propionic acid, and acetic acid (preservatives).

Keep out of Reach of Children
CAUTION
See side panel for additional precautionary statements

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EPA REG. NO. 270-165

EPA EST. NO. 45277-MO-2

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
CAUTION**

Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • 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 poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • 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.
IF IN EYES	<ul style="list-style-type: none"> • 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.
<p>In case of medical emergencies or health and safety inquiries, or in case of fire, leaking or damaged containers or for product use information, call toll free: (800) 234-2269</p>	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	

Personal Protective Equipment

Applicators and Handlers must wear:

- Long-sleeved shirt and pants
- Shoes and socks
- Chemical resistant 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.

User Safety Recommendations

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Keep out of lakes, streams and ponds. Do not contaminate water when disposing of equipment wash water.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

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

STORAGE: Store tightly closed in cool, dry place inaccessible to children and pets.

PESTICIDE DISPOSAL: Pesticide that cannot be used according to label instructions must be disposed of according to Federal, State or local procedures under the Resource Conservation and Recovery Act.

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

GENERAL INSTRUCTIONS AND INFORMATION

Feed the recommended dosage to each horse separately to make certain he receives his full portion. This product should be fed top dressed on grain or mixed with the horse's total ration to provide 70 mg of Rabon® per 100 lbs. of body

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weight. For an occasional finicky eater who does not accept new feeds readily, mix VITA PLUS® WITH EQUITROL® with sweet feed or grain ration.

Begin feeding VITA PLUS® WITH EQUITROL® early in the spring before flies begin to appear and continue feeding throughout the summer and into the fall until cold weather restricts fly activity.

VITA PLUS® WITH EQUITROL® Feed-Thru Fly Control prevents the development of House Flies and Stable Flies in the manure of treated horses but is not effective against existing adult flies. In some cases, supplemental fly control measures may be needed in and around paddocks and buildings to control adult House Flies and Stable Flies which can breed not only in manure but in other decaying vegetable matter or silage on premises.

In order to achieve optimum fly control, VITA PLUS® WITH EQUITROL® should be used in conjunction with other good management and sanitation practices.

**GENERAL PRECAUTIONS AND RESTRICTIONS
DO NOT USE ON HORSES INTENDED FOR SLAUGHTER**

CAUTION: Follow label directions. The addition to feed of higher levels of this premix containing Selenium is not permitted.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift.

Only protected handlers may be in the area during application.

This product contains tetrachlorvinphos, which is a cholinesterase inhibitor. The most frequently reported clinical signs of cholinesterase inhibition in the horse are abdominal pain, lethargy, sweating, tearing and excessive salivation. If these signs are seen in horses, consult your veterinarian immediately. Do not use this product simultaneously or within a week before or after treatment with cholinesterase inhibiting drugs, pesticides or chemicals. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals. This product has not been tested in breeding horses.

GUARANTEED ANALYSIS

Each pound contains not less than:

	Per Ounce	Per Pound
Lysine		0.05 %
Methionine		0.05 %
Calcium (min)	766 mg	2.75 %
Calcium (max)	836 mg	3.75 %
Phosphorous (min)	326 mg	1.15 %
Salt (min)	255 mg	0.9 %
Salt (max)	397 mg	1.4 %
Potassium (K)	241 mg	0.85 %
Magnesium (Mg)	12.5 mg	0.044 %
Copper (Cu)	4.0 mg	141 ppm
Selenium (Se)	120 mg	4 ppm
Zinc (Zn)	20.0 mg	705 ppm
Iodine (I)	1.0 mg	35 ppm
Iron (Fe)	100.0 mg	3,527 ppm
Cobalt (Co)	0.05 mg	18 ppm
Manganese (Mn)	10.0 mg	353 ppm
Vitamin A	25,000 IU	400,000 IU
Vitamin D ₃	2,500 IU	40,000 IU
Vitamin E	25 IU	400 IU
Vitamin B ₁₂	200 mg	3,200 mg/lb
Riboflavin (B ₂)	25 mg	400 mg/lb
d-Pantothenic Acid	62.5 mg	1,000 mg/lb
Thiamine (B ₁)	12.5 mg	200 mg/lb
Niacin	125.0 mg	2,000 mg/lb
Vitamin B ₆	5.0 mg	80 mg/lb
Choline	106.0 mg	1,696 mg/lb
Polyunsaturated Fatty Acids (as glycerides)		2.75 %

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DIRECTIONS FOR USE (Application Instructions)

DAILY DOSAGE

- 300-500 lb. Horse Feed 2/5 oz. (One EQUITROL measuring cup filled to the blue line) per horse per day.
- 500-700 lb. Horse Feed 3/5 oz. (One EQUITROL measuring cup filled to the red line) per horse per day.
- 700-900 lb. Horse Feed 4/5 oz. (One EQUITROL measuring cup filled to the green line) per horse per day.
- 900-1100 lb. Horse Feed 1 oz. (One full EQUITROL measuring cup) per horse per day.

For larger horses over 1100 lbs. of body weight feed 1/4 oz. for each 250 lbs. of body weight.

EPA REG. NO. 270-165

EPA EST. NO. 45277-MO-2

®RABON is a registered trademark of Boehringer Ingelheim.

FARNAM COMPANIES, INC.

Horse Products Division

P.O. Box 34820 • Phoenix, AZ 85067-4820

www.farnam.com

(602) 285-1660, M-F, 7am-3:45pm, MST

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