OCT | 5 | 1997

Ms. Karen Vasquez Boehringer Ingelheim Animal Health Inc. 2621 North Belt Highway St. Joesph, MO 64506

Dear Ms. Vasquez:

Subject: Label Amendments in Response to Basic Suppliers Deletion of Certain DDVP Uses

Vapona Concentrate Insecticide EPA Registration No. 4691-130

RAVAP E. C. Livestock, Poultry & Premise Insecticide Spray

EPA Registration No. 4691-136 Kennel and Yard Spray Concentrate EPA Registration No. 4691-137

Your Submission Dated May 17, 1995

The amendment 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 labeling changes indicated below prior to release for shipment of product bearing the amended labeling:

For EPA Registration No. 4691-130:

- 1. Under Environmental Hazards delete "For terrestrial uses." Your product is labeled only for terrestrial uses.
- 2. The statement of practical treatment must appear on the front panel for a product in toxicity category one based upon oral, dermal or inhalation exposure.
- 3. Revise the paragraph, Required Protective Clothing to read as follows:

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options follow the instructions of category. "C" on an EPA chemical resistance category selection chart in the Worker Protection Standard.

Applicators and other Handlers Must Wear:

• Coveralls over long-sleeved shirt and long pants.

directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters."

- 3. Qualify personal protective clothing as follows: "...or face shield and chemical resistant gloves and shoes, long sleeved shirt, pants and socks when handling."
- 4. Under Storage and Disposal add the following (based on your Toxicity Category): "Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance."
- 5. Under use directions revise "to the point of runoff" to read "but do not allow runoff to occur."

Submit two copies of each final printed labeling before you release the products for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely,

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



RAVAP® E.C.

Livestock, Poultry & Premise Insecticide Spray

ACCEPTED with COMMENTS in EPA Letter Dated

Contains RABON® and VAPONA® Insecticides	• •
ACTIVE INGREDIENTS	By Weight
Tetrachlorvinphos: 2-Chloro-1-(2,4,5-trichlorophenyl) vinyl dimethyl phosphate	
Dichlorvos: 2,2-Dichlorovinyl dimethyl phosphate	5.3%**
Related Compounds	. 0.4%**
INERT INGREDIENTS	71.3%***
TOTA	L 100.0%

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

*RABON Insecticide **Equivalent to 5.7% W VAPONA Insecticide ***Inert ingredients include Xylene 4691-This product contains the toxic inert ingredient phenol.

Keep Out of Reach of Children DANGER:

For Agricultural/Commercial Use Only Not for Sale for Any Other Uses

Store Above 32°F. Do not store above 120°F for extended period of time.

See other panels for additional precautionary statements.

Statement of Practical Treatment

If swallowed - Call a physician or Poison Control Center immediately. If possible, vomiting should be induced under medical supervision. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If inhaled - Remove victim to fresh air. Apply artificial respiration if necessary.

If on skin - Remove contaminated clothing and wash skin immediately with soap and water.

If in eyes - Flush eyes with plenty of water. Call a physician immediately.

Note to physician - If signs of cholinesterase inhibition are observed, atropine by injection is antidotal and may be administered in conjunction with 2-PAM (Pralidoxime Chloride). Product may cause aspiration pneumonia. Gastric lavage may be indicated if product was taken internally.

Precautionary Statements

Hazards to Humans and Domestic Animals

Corrosive, causes eye damage, causes skin irritation. Do not get in eyes (including animals), on skin or on clothing. Wear goggles or face shield and rubber gloves; long-sleeved shirt and pants; shoes and socks when handling.

Harmful if inhaled. Avoid breathing spray mist.

Harmful or fatal if swallowed. Wash thoroughly after using and before smoking or eating. Avoid contamination of food.

Environmental Hazards

This product is toxic to fish, birds, and other wildlife. Drift and runoff may be hazardous to aquatic organisms in adjacent areas. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater.

Physical and Chemical Hazards

Do not use, pour, spill or store near heat or open flame. Do not use with thermal foggers or heat-generating devices.

Storage and Disposal

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

Pesticide Storage- Store in original container only. Store at temperatures above 32°F. Do not store above 120°F for an extended period of time. Do not store diluted product.

Pesticide Disposal - Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your state pesticide or environmental control agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Container Disposal- Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by other approved State and local procedures.

Warranty and Limitation of Damages

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty, including any other express or implied warranty of Fitness or of Merchantability, and no agent of Seller is authorized to do so except in writing and with specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.

Net Contents: 1 Gallon (3.8 Liters)

4691-136 EPA Rcg No. 56493-42-

Fermenta Animal Health Company Kansas City, MO 64153-2314

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Directions for Use - Read the entire label prior to use.

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. For Agricultural /Commercial Use Only. This product is suitable for use in conventional power or low pressure knapsack sprayers and in livestock backrubbers. Follow the Use Directions for the proper dilution needed for specific insect control. Must be diluted in water except for backrubber use.

Livestock Use Directions

Use	Insect	Dilution•Ravap In Water	Remarks
Spray (Beef Cattle)	Horn Flies, Lice, including Tail Lice, and aids in control of Face Flies	1 gal. in 75 gal. or 5 oz. in 3 gal.	Dilute in water as indicated and spray directly on the animal only to the point of runoff. Use between 1/2 to 1 gallon of diluted spray solution per animal depending on size and hair coat. Do not treat more often than every 10 days. Do not apply to calves under six months of age. Brahman and Brahman-cross cattle should not be treated as they may show hypersensitivity to organophosphate pesticides. Do not apply in combination with other dermal organophosphate pesticides (e.g. trichlorfon). There is no withholding period from last application to slaughter.
	Horn Flies, Lone Star Ticks	1 gal. in 200 gal. or 2 oz. in 3 gal.	Apply as above. For severe tick infestations, dilution may be increased to 1 gallon in 50 gallon water.
Spray (Lactating Dairy Cattle)	Horn Flies, Lice, Lone Star Ticks, and aids in control of Face Flies	1 gal. in 200 gal. or 2 oz. in 3 gal.	Dilute in water as indicated. Direct spray to cover thoroughly with up to 1/2 gallon of the dilution per animal. Repeat as necessary. Do not apply to calves under six months of age. No milk discard is required. Care should be taken that the spray does not come in direct contact with the lactating dairy cow's teats unless they are washed with an approved cleansing solution and dried before milking. Apply the spray at least 20 minutes prior to milking or after milking has been completed.

Backrubber Use Directions

Use	Insect	Dilution•Ravap In Oil	Remarks
Backrubber or Facerubber (Beef and Dairy Cattle)	Horn Flies and aids in control of Face Flies	1 gal. in 25 gal. or 5 oz. in 1 gal.	Mix with #2 diesel oil or any approved backrubber base oil. Pour diluted solution into oil reservoir of mechanical rubbing devices or pour one gallon per 20 linear feet on burlap or rope backrubbers. Keep backrubber or facerubber charged.

Poultry Use Directions

Use	Insect	Dilution•Ravap In Water	Remarks
Caged Chickens	Lice & Mites	1 gal. in 50 gal. or , 5 oz. in 2 gal.	Apply I gal. of dilution/100 birds under high pressure (no less than 100-125 psi) to the vent and fluff areas from below. Repeat when necessary; however, not more often than every 14 days. For individual bird treatment, apply 1 ounce of dilution per bird.
Chickens on Litter	Lice & Mites	1 gal. in 50 gal. or 5 oz. in 2 gal.	Apply 1-2 gal. of dilution/1000 sq. ft. evenly with penetration of litter surface. Also apply thoroughly to walls, roosts, cracks and crevices. Spray birds as above. Treat roosters carefully to avoid reinfestation of breeding flocks.
Roost Paint	Lice & Mites	1 gal. in 25 gal. or 5 oz. in 1 gal.	Apply 1 pt. of dilution/100 ft. of roost area with brush or spray.
Poultry Buildings	Fowl Tick (Blue Bug)	1 gal. in 25 gal. or 5 oz. in 1 gal.	Apply 1 gal. of dilution/100-150 sq. ft. to thoroughly cover walls, ceilings, floors, cracks and crevices using high pressure spray.

Directions for Use - Continued

Premise Use Directions for Poultry and Livestock Facilities

Use	Insect	Dilution•Ravap In Water	Remarks
Residual Surface Spray	Flies, Gnats, Litter Beetles, Mosquitoes, Spiders, Wasps	1 gal. in 25 gal. or 5 oz. in 1 gal.	Apply 1 gallon of dilution/500-1000 sq. ft. Thoroughly cover walls, ceilings or other areas where pests rest or congregate in dairy barns, horse barns, poultry houses, swine buildings, livestock sheds and other farm buildings. Extreme infestations may necessitate increasing the diluted spray to one gallon per 12 1/2 gal. or 10 oz. per 1 gal. of water.
Larvicide	Maggots (fly larvae)	1 gal. in 25 gal. or 5 oz. in 1 gal.	Apply 1 gal. of dilution/100 sq. ft. of droppings as a coarse spray. Repeat at 7-10 day intervals until droppings begin to cone up, then treat only "hot spots" (small areas found to have large number of maggots). Do not spray manure where runoff to soil or water can occur. Do not spray animals directly with this concentration.
Residual Surface Spray - Kennels	Ticks, Fleas	1 gal. in 50 gal. or 5 oz. in 2 gal.	Apply 1 gal. of dilution/500-1000 sq. ft. Thoroughly treat infested kennel and outside runways.