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4691-136

9/30/99

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SEP 30 1999

Karen A. Vasquez  
Regulatory Affairs Manager  
Boehringer Ingelheim Vetmedica, Inc.  
2621 North Belt Highway  
St. Joseph, MO 64506-2002

Subject: Amendment: Tetrachlorovinphos RED  
Reregistration Label for RAVAP EC Livestock, Poultry & Premise Spray  
EPA Registration No. 4691-136  
Your Amendment Dated April 15, 1998

Dear: Ms. Vasquez:

The amendment referred to above, submitted in connection with registration the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the changes listed below prior to release for shipment of product bearing the amended labeling. With respect to labeling, we are evaluating the last label on file (dated May 1, 1998) since this label supercedes labeling submitted for reregistration.

1) The correct chemical name for your product should be listed as the following, which is the more specific isomer designation (please revise your active ingredients accordingly):

Tetrachlorovinphos: (Z)-2-chloro-1-(2,4,5-trichlorophenyl)vinyl dimethyl phosphate

2) Based upon the toxicity profile for this product:

a) The Statement of Practical Treatment must be revised as per the Acute Toxicity studies. It should state the following:

b)

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.

**IF IN EYES:** Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

**IF SWALLOWED:** Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

CONCURRENCES

SYMBOL	75055						
SURNAME	Spoel						
DATE	9/30/99						

Note to Physician section should include a company telephone number to specific medical personnel who can provide specialized medical advice and must also contain the following statement:

**Probable mucosal damage may contraindicate the use of gastric lavage**

- 3) Please revise your "Hazards to Humans and Domestic Animals" section to read as follows:

**DANGER**

Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through skin. Do not get in eyes (including animals), on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**Personal Protective Equipment (PPE)**

Applicators and handlers must wear:

- 1) Goggles or face shield,
- 2) Long-sleeved shirt and long pants,
- 3) Chemical-resistant gloves
- 4) Shoes and socks

**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**

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

- 4) Under your "Directions for Use" section, please add the subheading "Application Restrictions" and add the following language:

"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 enter or allow others to enter the treated areas until sprays have dried. Must be diluted with water except for backrubber use."

- 5) Under your "Environmental Hazards" section, please change the statement "Do not contaminate water..." to read "Do not contaminate water when cleaning equipment or when disposing of equipment washwaters."
- 6) Under your "Physical and Chemical Hazards" section, replace the first sentence with "**Combustible. Do not use, pour, spill or store near heat or open flame.**"
- 7) Move the "Storage and Disposal" section under the "Directions for Use" section. Remove the statement "Do not store above 120°F for an extended period of time" since the Flash Point is 93°F. Add the following statement to this section: "**Combustible. Do not use, pour, spill or store near heat or open flame.**"
- 8) Please submit two (2) copies of your final printed label for before you release the product for shipment. Please refer to the A-79 enclosure for a further description of final printed labeling. If these conditions are

not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact Dr. William Sproat of my team at (703) 308-8587.

Sincerely,

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

)  
Enclosure

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# Ravap<sup>®</sup> E.C.

*Livestock,  
Poultry  
& Premise  
Insecticide  
Spray*

NET CONTENTS  
**1 U.S. Gallon**  
12.85 Liters

Store above 32 °F  
Do not store above 120 °F  
for extended period of time.  
Read entire label before each use.

Code 037 531      97-01-01-911

RECOMMENDED FOR AGRICULTURAL / COMMERCIAL USE ONLY.  
NOT FOR SALE FOR ANY OTHER USES.

Contains RABON<sup>®</sup> and VAPONA<sup>®</sup> Insecticides

<i>Active Ingredients</i>	<i>By Weight</i>
Tetrachlorvinphos (CAS# 22244-70-9) .....	23.0% *
Dichlorvos (CAS# 62-73-7) .....	5.3% **
Related Compounds .....	0.4% **
<b>Other Ingredients</b> .....	<b>71.3% ***</b>
Total .....	
100.0%	

\* RABON Insecticide  
\*\* Equivalent to 1.7% of VAPONA Insecticide  
\*\*\* Other ingredients include Syntex  
This product contains the toxic  
pest ingredient permethrin.



**Boehringer  
Ingelheim**

**Keep Out of Reach of Children**

**DANGER**

See back panel for  
additional precautionary statements



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AGREEMENT  
with the Board  
in 82% of the Board

SEP 30 1999

4691-136

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# RAVAP® E.C.

Livestock, Poultry & Premise Insecticide Spray  
 RECOMMENDED FOR AGRICULTURAL/COMMERCIAL USE ONLY  
 NOT FOR SALE FOR ANY OTHER USES.

Contains RABON® and VAPONA® Insecticides	
<b>ACTIVE INGREDIENTS</b>	<b>By Weight</b>
Tetrachlorophos (CAS# 22246-78-8)	23.0%
Dibromvos (CAS# 82-73-7)	5.2%
Related Compounds	0.4%
<b>OTHER INGREDIENTS</b>	71.2%
<b>TOTAL</b>	<b>100.0%</b>

\*RABON insecticide  
 \*\*Equivalent to 5.7% W VAPONA insecticide  
 \*\*\*Other ingredients include Xylene  
 This product contains the toxic inert ingredient phenol.

### 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.

Beechinger Ingelheim Animal Health, Inc.  
 St. Joseph, Missouri 64508 USA  
 (800) 821-7487  
 EPA Reg. No. 4491-136  
 EPA Est. No. 44614-MO-1

### Livestock Use Directions: Do not make direct application to livestock more frequently than once per day.

Use	Insect	Dilution - Revap in Water	Remarks
Livestock 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 gallons water.
Livestock 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 - Revap in Oil	Remarks
Backrubber or Facrubber (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 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 facrubber charged.

### Poultry Use Directions

Use	Insect	Dilution - Revap in Water	Remarks
Caged Chickens	Lice & Mites	1 gal. in 50 gal. or 5 oz. in 2 gal.	Apply 1 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 reinestation 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 Bindings	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.

### Premise Use Directions for Poultry and Livestock Facilities

Use	Insect	Dilution - Revap 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.

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### Kennel Use Directions

Use	Insect	Dilution-Revap In Water	Remarks
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.

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

##### Danger

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 chemical resistant gloves and shoes, long-sleeved shirt, pants and socks when handling. This product may cause skin sensitization in certain individuals.

**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.

### 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.

### Environmental Hazards

This product is toxic to fish, birds, and other wildlife. Drift and runoff may be hazardous to aquatic organisms in adjacent areas. 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 washwaters.

### 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 acutely 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.

### Notice of Warranty

Boehringer Ingelheim Animal Health, Inc., makes no warranty of merchantability, fitness for any particular purpose, or otherwise, expressed or implied concerning this product or its uses which extend beyond the use of the product under normal conditions in accord with the statements made on this label.

**Boehringer Ingelheim Animal Health, Inc.**

St. Joseph, Missouri 64506 USA

(800) 821-7467

EPA Reg. No. 4691-135

EPA Est. No. 44616-MO-1