



June 11, 2006

Randy Sample, Director Regulatory Compliance,
Archer Daniels Midland Company
Animal Health & Nutrition Division
1000 N. 30th St.
Quincy, IL 62301

Subject: Submission of a label amendment in response to an Agency letter dated December 5, 2004.
Product Name: R.O.L. PREMIX
EPA Reg. No.: 7455-23
Date of Submission: January 4, 2005

Dear Mr. Sample;

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 2:

Within the "Directions for Use" directly under the statement: "It is a violation of Federal law to use this product in a manner inconsistent with its labeling.", add the following language:

"USE RESTRICTIONS"

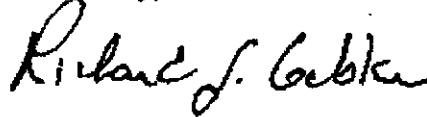
This product is not to be used on horses destined for slaughter. This product contains tetrachlorvinphos, which is a cholinesterase inhibitor. The most frequently reported clinical signs of cholinesterase inhibition in the horse are abdominal pain, lethargy, sweating, tearing and excessive salivation. 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."

2 7 4

Remove the similar text above that is located within the subject header "As a Topdressing".

A stamped copy of the label is enclosed for your records. If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



George LaRocca
Product Manager 03
Insecticide Branch
Registration Division (7505C)

Enclosure

3 8 4

R.O.L. PREMIX

(CONTAINS RABON® ORAL LARVICIDE)

To prevent the development of Horn Flies, Face Flies, House Flies and Stable Flies in the manure of treated cattle; House Flies in the manure of treated swine, House Flies and Stable Flies in the manure of treated horses and House Flies in the manure of treated mink. This product is not to be used on horses destined for slaughter.

ACTIVE INGREDIENT	By Weight
Tetrachlorvinphos (CAS Number 961-11-5).....	7.76%*
OTHER INGREDIENTS	92.24%**
	TOTAL..... 100.00%

ACQUAINTED
with **COMMENTS**
In EPA Letter Dated:
June 11, 2006

Under the Federal Insecticide, Fungicide, and Herbicide Act, as amended, for the pesticide registered under EPA Reg. No. 7455-23

*RABON Insecticide – Contains 35 grams of RABON per pound.
** Refers only to ingredients which are not larvicidal.

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

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 a 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. * Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, call toll free (800)-858-7378 (The National Pesticide Information Center)

NOTE TO PHYSICIAN AND VETERINARIAN

Poisoning Symptoms: Symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive pinpoint pupils, salivation, sweating, nausea, vomiting, diarrhea, and abdominal cramps.

Treatment: Tetrachlorvinphos is an organophosphate insecticide. If symptoms of cholinesterase inhibitor are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine. Atropine is antidotal only if symptoms of cholinesterase inhibition are present.

HAZARDOUS TO HUMANS

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction to some individuals. Personal Protective Equipment (PPE) should be used with long sleeved shirt and long pants, shoes and socks and chemical-resistant gloves.

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

User should 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.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not contaminate water when disposing of equipment wash water.

STORAGE AND DISPOSAL

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

STORAGE: Store in a dry place in original container.

DISPOSAL: Completely empty bag into mixing equipment. Then dispose of empty bag in a sanitary landfill or by incineration or if allowed, by State and local authorities by burning. If burned, stay out of smoke. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Manufactured by ADM Animal Health & Nutrition Division, Quincy, Illinois 62305-3115

NET WT 50 LB (22.67 kg)

EPA REG. NO. 7455-23

EPA Est. 37774-IA-01

00305

FRONT PANEL – SEE BACK PANEL

181782A0

8535

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R.O.L. PREMIX

DIRECTIONS FOR USE

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

Rations containing this product may be fed up to slaughter and to lactating dairy cows without withholding the milk from market during or after treatment.

Start feeding RABON® larvicidal feeds 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.

When fed, this product passes through the digestive system into the animal's manure where it kills fly larvae on contact shortly after fly eggs hatch.

It prevents the development of fly larvae in the manure of treated animals, but is not effective against existing adult flies.

In some cases, supplemental fly control measures may be needed in and around cattle lots and barns to control adult house flies and stable flies which can breed not only in manure but in other decaying vegetable matter or silage on the premises.

In order to achieve optimum fly control, this product should be used in conjunction with other good management and sanitation practices.

This product will mix uniformly in feeds when standard mixing procedures are followed. Thus, usual problems that are common to all feed preparation and which cause stratification, such as excessive free-fall or excessive handling, are to be avoided. It is recommended that appropriate preblending techniques be employed to assure adequate distribution throughout the feed mix. The premix should be preblended with ground grain, protein supplements, mineral mixes, etc. before being added to roughage such as chopped hay or silage. Mixing time should be adequate to assure uniform dispersion. Optimum performance can be assured only if this product is dispersed uniformly with the feedstuff at the recommended level. Common feed mixing equipment (i.e. vertical mixers, horizontal blenders, mixer/feeder truck) may be used to prepare formulated feeds.

CATTLE

In A Concentrate Feed - Roughage Fed Separately

This product can be used to prepare concentrate feeds that will provide 70 mgs. of RABON per 100 pounds of body weight daily. To prepare a larvicidal concentrate feed, mix this product according to the amount of concentrate to be fed per animal per day. Use the following table as a guide for determining the proper mixing rate.

MIXING DIRECTIONS

Pounds of Concentrate Consumed per Animal per Day	RABON in the Concentrate mg/lb	%	Pounds of RABON 7.76% Oral Larvicide Premix per Ton of Concentrate
5	1584	0.35	90.0
1.0	792	0.18	45.0
1.5	528	0.12	30.0
2.0	396	0.087	22.5
5.0	159	0.035	9.0
10.0	79	0.018	4.5
15.0	53	0.012	3.0
20.0	39	0.0087	2.3
25.0	32	0.0069	1.8
30.0	26	0.0059	1.5

Feed the appropriate larvicidal concentrate indicated to cattle weighing between 400 and 1200 pounds. For larger cattle weighing between 1200 and 1700 pounds, increase the amount of premix per ton of concentrate to 1½ times that indicated.

CATTLE

In a Complete Ration - No Other Roughage Feed

This product can be used to prepare rations containing 26.4 mg of RABON per pound of complete ration.

To prepare a larvicidal ration, mix 1.5 pounds of this product per ton of complete mixed ration containing both grain and roughage.

Full feed this larvicidal complete ration to feeder cattle weighing from 400 to 1400 pounds or to dairy cattle at a rate to sustain milk production, but not less than 2.6 pounds of the ration per 100 pounds of body weight daily.

SWINE

All Swine Should Be Treated

Pigs (Weaners To Market Weight): Mix 1.3 pounds of this product per ton of meal type feed and offer free choice. This is equivalent to 22.7 mg of RABON per pound of feed.

Sows, Boars and Breeding Gilt: Mix 2.6 pounds of this product per ton of meal type feed and offer 4-6 pounds of feed per animal per day. This is equivalent to 45.4 mgs of RABON per pound of feed.

HORSES

In a Concentrate Feed

This product can be used to prepare concentrate feeds that will provide 70 mgs. of RABON per 100 pounds of body weight daily. All horses in the stable area should be treated.

To prepare a larvicidal concentrate feed, mix this product according to the amount of concentrate to be fed per day. Use the following table as a guide for determining the proper mixing rate.

MIXING GUIDE

Pounds of Concentrate Consumed per Horse per Day	Pounds of RABON 7.76% Oral Larvicide Premix per Ton of Concentrate			
	250 lb Horse	500 lb Horse	1000 lb Horse	2000 lb Horse
2.5	4.0	8.0	16.0	32.0
5.0	2.0	4.0	8.0	16.0
10.0	1.0	2.0	4.0	8.0
15.0	0.7	1.4	2.7	5.4

As a Topdressing

Add this product to the grain or concentrate portion of the horse's diet to provide 70 mg of RABON per 100 pounds of body weight. This is equivalent to the following: ½ tablespoon for a 250 lb animal, 1 level tablespoon for a 500 lb animal, 2 level tablespoons (8.8 g) for a 1000 lb animal, or 4 tablespoons for a 2000 lb animal.

All horses in the stable area should be treated. This product is not to be used on horses destined for slaughter.

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.

MINK

When fed to mink, RABON passes through the digestive system into the droppings where fly larvae are killed on contact shortly after the fly eggs hatch. This product can be mixed in mink feeds to prevent the development of house flies but should be used as the sole method of control. It is recommended that appropriate preblending techniques be employed when mixing an adequate distribution of RABON throughout the feed mix. Preblend with soybean meal, alfalfa meal, mineral mix, etc. before being added to other ingredients. Common feed mixing equipment (i.e. vertical mixers, horizontal blenders) may be used to prepare formulated feeds.

Add this product to the total feed at a rate that will ensure that each animal will consume 3 mg of RABON per kg of body weight (1-2 mg/pound) per day. Use the following table as a guide

MIXING GUIDE FOR MINK

Food Consumed (lb) Daily per Animal	Amount of RABON 7.76% to Mix in Food		
	500 lb	1000 lb	2000 lb
0.10	318 grams	1.4 lb	2.8 lb
0.25	114 grams	237 grams	1.0 lb
0.33	90 grams	180 grams	360 grams
0.50	59 grams	118 grams	236 grams
0.75	40 grams	80 grams	160 grams
1.00	35 grams	70 grams	140 grams

Start feeding mink larvicidal feeds early in the spring before flies begin to appear and continue feeding throughout the summer until cold weather restricts fly activity. Supplemental adult fly control measures may be needed in and around the animal facilities and feed building to control adult flies, especially house flies that can be bred in many kinds of organic matter.

In order to achieve fly control this product should be used in conjunctions with other food management and sanitation practices.