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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 1, 2010

Ms. Judy Ring, General Manager  
Ragland Mills, Inc.  
14079 Hammer Road  
Neosho, MO 64850-7864

**Subject: Amended Labeling, Change of Product Name  
RAGLAND® Phos-8 With Rabon® Oral Larvicide, EPA Reg. No. 9374-9  
Your Submission Dated March 8, 2010**

Dear Ms. Ring:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the following label revision provision(s):

General Comment(s):

1. Delete all text throughout the label marked with "strikethrough."
2. The change of the primary active product name from "RAGLAND® Ranch-O Phos-8 With Rabon® Oral Larvicide" to "RAGLAND® Phos-8 With Rabon® Oral Larvicide" is acceptable.

Ingredient Statement section comment(s):

3. Within the last line of this section, replace the word "INERT" with the word "OTHER."
4. Revise the existing subsection header "GUARANTEED ANALYSIS" to read "GUARANTEED FEED ANALYSIS."

First Aid Statement section comment(s):

5. Replace this section with the following text, so that it appears immediately following the relocated "Hazards to Humans and Domestic Animals" subsection as detailed in Items #6 and #7 on the next page.

<b>FIRST AID (Organophosphate)</b>	
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p align="center"><b>HOT LINE NUMBER (Organophosphate)</b></p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. <b>For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-424-9300.</b><sup>1</sup></p> <p align="center"><b>NOTE TO PHYSICIANS AND VETERINARIANS:</b></p> <p>CONTAINS AN ORGANOPHOSPHATE THAT INHIBITS CHOLINESTERASE. 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. Do not use this product on animals simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides or chemicals.</p>	

<sup>1</sup> Please note that the "1-800-424-9300" telephone number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

Precautionary Statements, Hazards to Humans and Domestic Animals subsection comment(s):

- 6. As specified in Chapter 7, Section III.C.2 of EPA's Label Review Manual, the "**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**" statements must appear directly following the section heading "**PRECAUTIONARY STATEMENTS**" and under the "**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**" subsection heading. As such, relocate the existing "**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**" subsection heading and associated statements to appear immediately following the existing "**PRECAUTIONARY STATEMENTS**" section heading.
- 7. Insert the following statement immediately preceding the existing 4<sup>th</sup> sentence: "Wash hands thoroughly with plenty of soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet."

Personal Protective Equipment (PPE) subsection comment(s):

- 8. Replace the existing "Personal Protective Equipment (PPE):" subsection with the following:

"Some materials that are chemical-resistant to this product are butyl rubber, neoprene and polyvinyl chloride (PVC). If you want more options, follow the instructions for category A 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 and protective eye wear."

- 9. Replace the existing statement "Follow manufacturer's instructions for ..." with the following newly entitled subsection:

**"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."

- 10. Within the existing boxed statement starting with "User should wash hands ...," insert the subsection heading "**USER SAFETY RECOMMENDATIONS**," immediately preceding the 1<sup>st</sup> sentence, similarly to how the subsection heading has been placed in the existing "**STORAGE AND DISPOSAL**" section.

Storage and Disposal section comment(s):

- 11. Replace the existing "**Storage**:" subsection with "**Pesticide Storage**: Keep this product in its tightly closed original container, when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals."
- 12. Revise the existing "**Container Disposal**:" and "**Pesticide Disposal**:" subsections to read "**Pesticide Disposal**: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling**: Nonrefillable container. Do not reuse or refill this container. Place in trash or recycle, if appropriate, or dispose of in a sanitary landfill or by other procedures approved by state and local authorities."

Directions for Use, General Information subsection comment(s):

- 13. Revise the existing section heading "**General Information**" to read "**Use Information**."

Directions for Use, General Precautions and Restrictions subsection comment(s):


- 14. Revise the existing subsection heading "**General Precautions and Restrictions**" to read "**Use Restrictions & Precautions**"
- 15. Insert the following statement immediately following the existing 2<sup>nd</sup> sentence: "This product is not to be used on horses destined for slaughter."
- 16. Relocate this revised subsection so that it appears immediately following the statement "It is a violation of ..." at the beginning of the "**DIRECTIONS FOR USE**" section on this label.

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A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely yours,

*FOR*  


Richard J. Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7504P)

Enclosures: *Label stamped "Accepted with Comments"*  
009374-00009 D430464



NET WT. 50 LBS.  
(22.68 kg)

# Phos-8

## With Rabon® Oral Larvicide

FOR BEEF CATTLE ON PASTURE  
FOR LACTATING & NON-LACTATING DAIRY CATTLE

### ACTIVE INGREDIENTS:

Tetrachlorvinphos: (Z)-2-chloro-1-(2,4,5-trichlorophenyl) vinyl dimethyl phosphate	0.80%
INERT INGREDIENTS:*	99.20%
TOTAL	100.00%

\*Refers only to ingredients which are not larvicidal.

EPA REG. NO. 9374-9  
EPA EST. NO. 09374M001

### GUARANTEED ANALYSIS:

Calcium (Ca), maximum	13.00%
Calcium (Ca), minimum	11.00%
Phosphorus (P), minimum	8.00%
Salt (NaCl), maximum	24.00%
Salt (NaCl), minimum	20.00%
Magnesium (Mg), minimum	30%
Potassium (K), minimum	30%
Copper (Cu), minimum	45 ppm
Iodine (I), minimum	30 ppm
Zinc (Zn), minimum	380 ppm
Vitamin D3, minimum	20,000 I Units Per Lb.
Vitamin A, minimum	60,000 I Units Per Lb.

### FEED INGREDIENTS:

Dicalcium Phosphate, Salt, Cane Molasses, Soy Millfeed, Magnesium Oxide, Calcium Carbonate, Ethylene Diamine Dihydriodide, Cobalt Carbonate, Zinc Oxide, Copper Oxide, Iron Oxide, Manganese Oxide, Vegetable Fat, Vitamin A Supplement, Vitamin D3 Supplement, Artificial Flavors Added.

This product was made in a feed manufacturing facility that does not handle or store products containing animal proteins prohibited in ruminant feed.



KEEP OUT OF REACH OF CHILDREN  
CAUTION

SEE ADDITIONAL PRECAUTIONARY STATEMENTS

Manufactured by

# Ragland Mills, Inc.

14079 Hammer Rd. Neosho, MO 64850 (417) 451-2510

## PRECAUTIONARY STATEMENTS STATEMENT OF PRACTICAL TREATMENT

**If Swallowed** – Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger, or if available by administering syrup of ipecac. If person is unconscious, do not give anything by mouth and do not induce vomiting.

**If Inhaled** – Remove victim to fresh air. Apply respiration if necessary.

**If on Skin** – Wash with plenty of water. Get medical attention.

**If in Eyes** – Flush eyes with plenty of water. Call a physician if irritation persists.

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS 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.

Personal Protective Equipment (PPE): Mixers and Handlers must wear long-sleeved shirt and pants, shoes and socks, and chemical resistant gloves.

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.

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. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

### ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in a National Pollutant Discharge Elimination System (NPDES) permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or the Regional Office of EPA.

### 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 in a dry place in original container.

**Container Disposal** – Completely empty bag into application 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.

**Pesticide Disposal** – Pesticide that cannot be used or chemically reprocessed should be disposed of at an approved waste disposal facility.

### General Information

RAGLAND PHOS-8 prevents the development of horn flies, face flies, house flies and stable flies in the manure of treated cattle, but is not effective against existing adult flies. When starting a feeding program during the fly season, it may be necessary to use other control measures to reduce the population of existing adult flies.

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

In order to achieve optimum fly control, RAGLAND PHOS-8 should be used in conjunction with other good management and sanitation practices.

### General Precautions and 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.

### Application Instructions

Feed RAGLAND PHOS-8 at the rate of 3 ounces per 1000 pounds of body weight head per day free choice or by mixing it into the ground grain or complete daily ration. RAGLAND PHOS-8 may be fed up to slaughter and to lactating dairy cows. Start feeding RAGLAND PHOS-8 early in the spring before flies begin to appear and continue feeding throughout the summer into the fall until cold weather restricts fly activity.



### 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.

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