

APR 14 2004

Patrick Rolfes
Chem-Tech, Ltd.
4515 Fleur Drive - #303
Des Moines, Iowa 50321

SUBJECT: Amendment - Updating Labelling
Vapona Insecticide Emulsible Concentrate
EPA Registration Number 47000-17
1% Vapona
EPA Registration Number: 47000-52
Dairy Cattle Spray
EPA Registration Number 47000-54
Your Submissions Dated November 28, 29 and 30, 2003

Dear Mr. Rolfes:

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.

1. On the front panel for all products delete the statement "Not for Sale for Any Other Uses."
2. For EPA registration Number: 4700-52 add minimum retreatment interval for "barn fog use" similar to instructions under animal buildings.

Based on your letter and explanation dated November 30, 2003 it is not necessary to add the precaution "Remove animals prior to treatment."

The revised CSF's dated November 28, 29 and 30, 2003 are acceptable and replaces all previously submitted CSF's.

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

Sincerely yours,

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

Enclosures

ACCEPTED
with COMMENTS
in EPA Letter dated



VAPONA INSECTICIDE EMULSIBLE CONCENTRATE

APR 14 2004

Under the Federal
Fungicide, and Insecticide
Act as amended, and the
registered under EPA

47000-17

FOR AGRICULTURE/COMMERCIAL USE ONLY. NOT FOR SALE FOR ANY OTHER USES

For use in Livestock Buildings, Horse Stables, Dairy Barns, Auction and Show Barns, Picnic Grounds, Backyard Areas, Patios, Loading Docks, Outdoor Latrines, Packing Areas, Refuse Areas Around Service Stations, Open Air Drive-ins, Garbage Collection, Disposal Areas and Dog Kennels.

ACTIVE INGREDIENTS:

Dichlorvos (2,2-dichlorovinyl dimethyl phosphate).....	43.61%
Related compounds.....	0.89%
*OTHER INGREDIENTS.....	55.50%
TOTAL	100.0%

*Contains petroleum hydrocarbons

(Equiv. to 44.5% DDVP or 4.0 lbs Vapona Insecticide per gal.)

KEEP OUT OF REACH OF CHILDREN
DANGER (skull and crossbones) **POISON**

FIRST AID

If swallowed: Immediately call poison control center or doctor. Do not induce vomiting unless told to do so by poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

If in eyes: 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 advise.

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice.

If Inhaled: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment.

For emergency information contact the National Pesticide Information Center at 1-800-858-7378 between 6:30 am and 4:30 Pacific Time. After 4:30 call your poison control center.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO PHYSICIAN AND ANTIDOTE STATEMENTS

SYMPTOMS: Symptoms include weakness, headaches, tightness of chest, blurred vision, non-reactive pin-point pupils, salivation, sweating, nausea, vomiting, diarrhea and abdominal cramps.

ANTIDOTE AND FIRST AID TREATMENT: Atropine is the emergency antidote for VAPONA insecticide poisoning. CALL A PHYSICIAN IMMEDIATELY IN ALL CASES OF SUSPECTED POISONING.

TREATMENT: Atropine is the specific therapeutic antagonist of choice against parasympathetic nervous stimulation if there are signs of parasympathetic stimulation, Atropine sulfate should be injected at 10 minute intervals, in doses of 1 to 2 mgs., until complete Atropinization has occurred. 2-PAM is also antidotal and may be administered in conjunction with Atropine. Morphine is contraindicated. Clear chest by postural drainage. Repeated exposure to cholinesterase inhibitors may, without warning, cause prolonged susceptibility to very small doses of any cholinesterase inhibitor. Allow no further exposure until cholinesterase regeneration has been allowed, as determined by blood test.

Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

DANGER

Fatal if swallowed, inhaled or absorbed through the skin or eyes. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

Applicators and other handlers must wear: Coveralls over long-sleeved shirt and long pants; chemical-resistant gloves such as Barrier Laminate, Butyl Rubber, Nitrile Rubber, Neoprene Rubber, Polyvinyl Chloride or Viton; Chemical-resistant footwear plus socks; Protective eyewear; Chemical resistant headgear for overhead exposure; Chemical resistant apron when mixing/loading and cleaning equipment.

Wear a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this products concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark.. Do not apply when weather conditions favor drift from areas treated. Apply this product only as specified on this label. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

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. Store containers in a secure area under lock and key. Storage area should be equipped to handle an accidental spill if necessary.

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.

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.

AGRICULTURAL PREMISES: Animal shelters, barns, dairy barns, feed lots, milk rooms, milk sheds, pig parlors, stables (Flies, Gnats, Mosquitoes, Roaches, Fleas, Ants, Sowbugs, Brown Dog Ticks).

Dosage: Use a 0.5% solution by diluting 1 pint Vapona Insecticide with 12 ½ gallons of water.

Apply as a fog or mist inside building at the rate of 1 quart diluted solution per 8,000 cu. ft. Do not contaminate feed, drinking water, milk or milking equipment. Do not use this solution for fogging or misting purposes in areas where animals have received a direct application of dichlorvos or other organophosphates within 8 hours.

Apply as a spray to all exterior and interior surfaces at the rate of one quart diluted solution per 1,000 sq. ft. Do not contaminate water, feed, milk, or milking equipment. Apply with mist blower or other suitable equipment as an overall application at the rate of 5 gallons 0.5% diluted solution (0.2 lbs. actual Vapona) per acre. The mist spray should be directed over the entire area. Particular attention should be given to areas where flies congregate such as fences, spillage areas around feed bunks, and walls of buildings. Avoid application to exposed feed and water.

Treat outdoor living areas, picnic grounds, backyard areas, patios, loading docks, outdoor latrines, parking areas, refuse areas around service stations, open-air drive-ins, ice cream stands, garbage collection and disposal areas.

In treating dog kennels apply to outside dog runways, window sills and ledges. For control of fleas and brown dog ticks increase dosage to two qts. 0.5% solution per 1000 sq. ft.

In poultry houses, apply to manure, window sills, outside of penned enclosures and on floor of feed storage rooms.

Before applying in enclosed areas, reduce air movement as much as possible by closing doors, windows and other openings. Do not treat animals or humans. Do not contaminate water, feed or foodstuffs, milk or milking utensils. Repeat as necessary but no more than once per day.

CATTLE, Beef and Dairy: Apply Vapona Insecticide as a 1.0% spray to control horn flies, stable flies, face flies, house flies and mosquitoes.

To prepare a 1.0% spray, dilute 1 quart of Vapona Insecticide (4.0 lbs. per gal.) with 12 1/2 gallons of water. Apply 1 to 2 fluid ounces per animal, as a mist spray daily with hand or automatic sprayer. Spray to thoroughly cover all parts of the animal, including the legs but do not wet the skin. Do not make direct application to livestock more frequently than once per day.

Brahman and Brahman cross cattle should not be treated as they may show hypersensitivity to organophosphates.

Do not treat animals within one day of slaughter.

Do not apply dermally in combination with trichlorfon.

NOTICE

It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Chem-Tech, Ltd, the manufacturer or seller. To the extent allowed by law, Chem-Tech, Ltd, the manufacturer or seller shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Chem-Tech, Ltd, the manufacturer or seller makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise with regard to the product sold, including, but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage. Buyer's or user's exclusive remedy, and Chem-Tech, Ltd's, the manufacturer's or seller's total liability, shall be for damages not exceeding the cost of the product.

EPA Reg. No. 47000-17

EPA Est. No. 47000-IA-01

NET CONTENTS: _____

Mfg. By:
Chem-Tech, Ltd.
Des Moines, IA 50321