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Ms. Kelle M. Rolfes
Chem-Tech, Ltd.
4515 Fleur Drive #303
Des Moines, IA 50321

Dear Mr. Melton:

Subject: Label Amendment in Response to Basic Supplier's Deletion of Certain DDVP Uses
Dairy Cattle Spray
EPA Registration No. 47000-54
Your Application Dated October 24, 1995

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below:

1. On the front panel of your label add the following:

FOR AGRICULTURAL/COMMERCIAL USE ONLY. NOT FOR SALE FOR ANY OTHER USES.
2. On front panel following "Kills and Repels horn flies ..." add: "To Kill and Repel Flies, Mosquitoes, Gnats in Livestock Buildings"
3. Add the following to Direction for Use: "Do not make direct application to livestock more frequently than once per day."
4. Under Environmental Hazards replace "Keep out of any body of water" with "Do not apply directly to any body of water." Also add "Do not contaminate water by disposal of equipment washwaters."
5. The statement should read "Do not use this solution for fogging or misting...direct application of dichlorvos or other organophosphate within eight hours."
6. Add the following to Directions for Use: "Do not remain in treated areas and ventilate the area after treatment is complete. Remove animals prior to treatment."
7. Add "Brahman and Brahman cross cattle should not be treated as they may show hypersensitivity to organic phosphates."
8. Under Precautionary Statements add: "Wear a pesticide respirator with either 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 prefix number TC-14G when applying indoor as a space spray of fog."
9. Delete the statement "To protect livestock from attack from fleas. is obtained" because fleas are generally not pests of livestock.
10. Add the following to the front panel or to the beginning of the Directions for Use: "For use in areas under the general category of farm buildings, (farm yards); dairy and farm premises; feet lots, including around feed lots, stockyards, corrals, holding pens, fences, etc.; animal buildings, including barns, feeding areas, shelters and stables; dairy barns (including milk rooms, equipment and barnyards); and livestock feeding areas."

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11 Your October 11, 1994 submission requesting the deletion of the active ingredient MGK-326 from your formulation is approved. Therefore remove MGK 326 from the active ingredient statement and revise the amount of inert ingredient accordingly.

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)



DAIRY CATTLE SPRAY

Kills and repels horn flies, stable flies, mosquitoes and gnats.

When properly applied, the repellent effect against above insects will last two days.

ACTIVE INGREDIENTS:

Pyrethrins05%
Piperonyl butoxide, technical10%
N-octyl bicycloheptene dicarbo. imide16%
Di-n-propyl isocinchomeronate20%
Dichlorvos (2,2-dichlorovinyl, dimethyl phosphate)465%
Related Compounds035%
INERT INGREDIENTS:	98.99%
TOTAL	100.00%

* Consists of 0.00% (butylcarbamyl) (6-propylpiperonyl) ether and 0.02% other related compounds.
 ** MCK 264 Insecticide Synergist U.S. Pat. No. 2,476,512
 *** MCK Repellent 326 U.S. Pat. No. 2,757,120
 1:1 equivalent to 50%w of Vapona™ Insecticide Shell™ Trademark
 †† Contains petroleum distillate.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

SEE ADDITIONAL CAUTIONS ON SIDE PANEL

NET CONTENTS: 2 1/2 GALLON (9.463 L)

MANUFACTURED BY:
CHEM-TECH, LTD
4515 Fleck Dr
DES MOINES IA 50321



ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV 21 1997

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the purpose of registration under EPA

47000-54

DIRECTIONS FOR USE (Con't.)

To protect livestock from attack by flies, spray bedding and walls of pen, particularly cracks and crevices. Repeat treatment frequently until adequate control is obtained.

In a complete fly control program these sprays should be used in combination with residual insecticides and sanitary measures.

To develop a residual repellent to stable flies, horn flies, mosquitoes and gnats on dairy cows, apply 1 to 2 ounces of Dairy Cattle Spray to each animal for a three day period. The spray should be applied with a good hydraulic-type hand sprayer so that the animal's entire body has been uniformly covered. Special care should be used in spraying the legs, belly and shoulders. Avoid areas around the nose, eyes and mouth. Avoid wetting the hide. Spray in the same manner again after two days have elapsed and every second day thereafter or when insects again disturb the animal. Be sure the teats and udder are washed with warm water prior to milking. Cows should be sprayed very lightly once a day instead of attempting to build up a residual repellent by spraying more heavily.

For control of lice on livestock spray the animals with 2 ounces of Dairy Cattle Spray. Immediately rub the spray into the hair, paying particular attention to infested areas. Repeat as necessary, but not more frequently than once every three weeks.

To kill flies, mosquitoes and gnats in the barn prior to milking, close all doors and windows and direct the spray toward the ceiling. The barn should remain closed for 10 to 20 minutes. Sweep up and destroy fallen insects. Repeat as necessary. Apply at the rate of one ounce spray per 1,000 cubic feet. Do not use this mist solution in areas where animals have received direct spray within 2 hours. Do not contaminate water, feed or foodstuffs, milk or milking equipment.

NOTICE

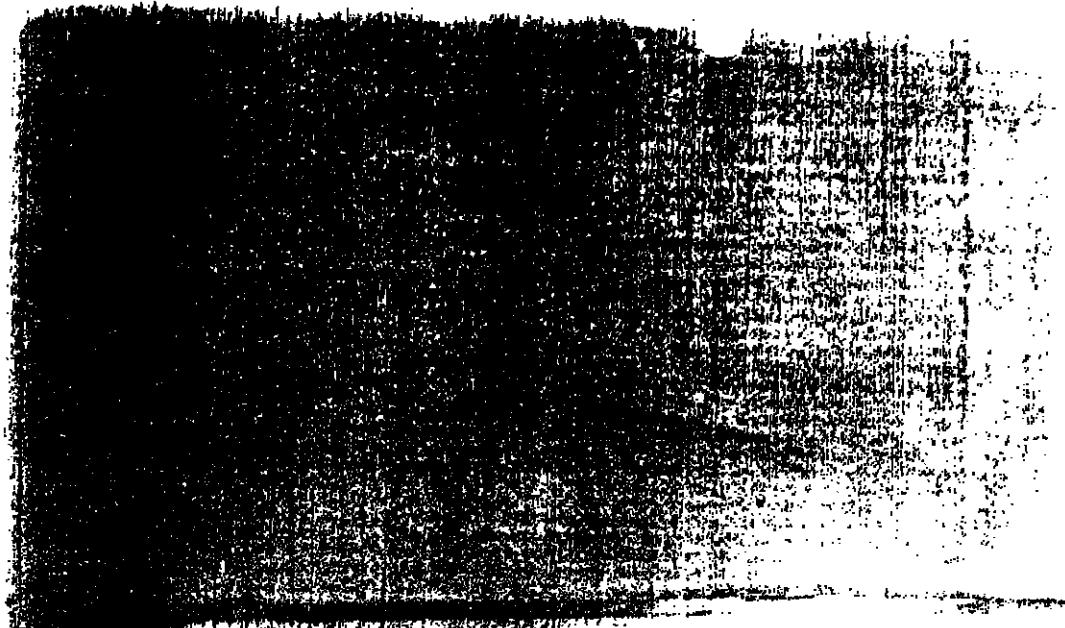
Seller's guarantee shall be limited to the terms of the label and subject thereto the buyer assumes any risk to persons or property arising out of use or handling and accepts the product on these conditions.

EPA REG. NO. 47000-54
EPA EST. NO. 47000-1A-01

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CAUTION

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

Harmful if swallowed, inhaled or absorbed through the skin. Avoid contact with skin. Wash thoroughly with soap and water after handling and before eating or smoking. Avoid prolonged breathing of spray mist.

If swallowed, consult a physician immediately. Avoid overspraying which will result in wetting the animals' hides. Avoid contamination of milk and milk handling equipment.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Keep out of any body of water. Apply this product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

DO NOT USE, POUR, SPILL, OR STORE NEAR HEAT OR OPEN FLAME.

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Do not induce vomiting. Contact a physician. Solvent poses an aspiration hazard.

If Inhaled: Remove to fresh air and apply artificial respiration if needed.

If On Skin: Wash with soap and water.

If In Eyes: Flush with water for 15 minutes. In all cases consult a physician.

DIRECTIONS FOR USE:

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

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry, secure area in original container.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER: (Plastic); Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerator, or, if allowed by state and local authorities, by burning. If burning, stay out of smoke

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