

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

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
47000-54



DAIRY CATTLE SPRAY

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

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

For use in areas under general category of farm buildings, (farm yards); dairy and farm premises; feed 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.

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

ACTIVE INGREDIENTS:

Pyrethrins.....	0.05%
*Piperonyl butoxide, technical.....	0.10%
**N-Octyl bicycloheptene dicarboximide.....	0.16%
+Dichlorvos (2,2-dichlorovinyl, dimethyl phosphate).....	0.49%
+Related Compounds.....	0.01%
++OTHER INGREDIENTS.....	<u>99.19%</u>
TOTAL.....	100.00%

*Consists of .08% (butylcarbityl) (6-propylpiperonyl) ether and .02% other related compounds.

**MGK 264

+Equivalent to .50%w of Vapona

++Contains petroleum distillate.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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 advice.
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: POISONING SYMPTOMS: Symptoms include weakness; headache; tightness in chest; blurred vision; non-reactive, pin-point pupils; salivation; sweating; nausea; vomiting; diarrhea; and abdominal cramps.

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 milligrams until complete atropinization has occurred. Pralidoxime chloride (2-PAM) may also be used as an effective antidote in addition to and while maintaining full atropinization. In adults, an initial dose of 1 gram of 2-PAM should be injected, preferably as an infusion in 250 cc of saline over a 15 to 30 minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injection as a 5 percent solution in water over not less than two minutes. After about an hour, a second dose of 1 gram of 2-PAM will be indicated if muscle weakness has not been relieved. For infants and children the dose of 2-PAM is 0.25 gram. Morphine is an improper treatment.

Clear chest by postural drainage. Oxygen administration may be necessary. Observe patient continuously for 48 hours. 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 attained as determined by blood test.

Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

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

CAUTION

Harmful if swallowed, inhaled or absorbed through the skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

Wear a pesticide respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TX-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter when applying indoor as a spray or fog.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not apply to any body of water. Do not contaminate water by disposal of equipment washwaters. 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.

DIRECTIONS FOR USE

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

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

To develop a residual repellency to stable 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. Do not make direct application to livestock more frequently than once per day. 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. Calves should be sprayed very lightly once a day instead of attempting to build up a residual repellence by spraying more heavily. Brahman and Brahman cross cattle should not be treated as they may show hypersensitivity to organic phosphates.

For control of lice on livestock, spray the animals with 2 ounces of DAIRY CATTLE SPRAY. Immediately rub the spray into the hair (do not use bare hand), 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 towards the ceiling. The barn should remain closed for 10 to 20 minutes. Sweep up and destroy fallen insects. Repeat as necessary but no more than once per day. Apply at the rate of one ounce spray per 1,000 cubic feet. Do not remain in the treated areas and ventilate the area after treatment is complete. Do not use this solution for fogging or misting in areas where animals have received direct application of dichlorvos or other organophosphate within 8 hours. Do not contaminate water, feed or foodstuffs, milk or milking utensils. Avoid overspraying which will result in wetting the animals' hides. Avoid contamination of milk and milk handling equipment.

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 burned, stay out of smoke.

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

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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. 47000-54

EPA Est. No. 47000-IA-01

NET CONTENTS: _____

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