

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

OFFICE OF PREVENTION PENHODES AND TOXIC SUBSTANCES

SEP 1 4 2004

Steven E. Rogosheske Chem-Tech Ltd. 1479 West Pond Road Eagan, MN 55122

Subject:

Label Amendment - Change Brand Name & Update label's Precautionary

& Warranty Statements

Prozap VIP Spray

EPA Reg. No. 47000-108

Your Submission Dated May 17, 2004

Dear Mr. Rogosheske:

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. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Either delete the claim "When properly applied, the repellent effect against target insects will last two days" or provide efficacy data to support the claim.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely

George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

with COMMENTS
in EPA Letter Dated
SEP 1 4 2004
Under the Federal Insecticide.
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47000-10

Prozap® VIP SPRAY

FOR AGRICULTURAL/COMMERCIAL USE ONLY

Editors note: [Text in brackets are optional marketing statements, any or all of which may appear on the final printed label.]

[Kills and repels horn flies, houseflies, stable flies, mosquitoes and gnats.]
[Synergized Ready-To-Use Solution]
[Controls Flies, Gnats & Mosquitoes]
[For Use on Cattle, Horses, Premise or Stables]

[Fog or Spray]

[.5% Vapona]

[.5% Vapona with Synergized Pyrethrins]

[When properly applied, the repellent effect against target insects will last two days.]

ACTIVE INGREDIENTS:

Pyrethrins	0.025%
*Piperonyl butoxide, technical	0.250%
**Dichlorvos (2,2-dichlorovinyl, dimethyl phosphate)	0.465%
**Related Compounds	
+OTHER INGREDIENTS:	
TOTAL	100.000%

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

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:

If on skin or clothing:

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.

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 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.

^{**}Equivalent to 0.50% Vapona insecticide

⁺Contains petroleum distillate.

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. Pralidoxime chloride (2-PAM) may also be used as an effective antidote in addition to and while maintaining full atropinization. In adults, 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 0.25gram. 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 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 space spray or fog.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and wildlife. Do not apply directly to water, or to target areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by disposal of equipment washwaters.

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.

Do not apply in areas where animals have received direct application of DDVP within eight (8) hours.

FOR DAIRY AND BEEF CATTLE AND HORSES:

To protect livestock from face flies, houseflies, stable flies, mosquitoes and gnats apply 1 to 2 ounces of VIP SPRAY to each animal. Cover the animal with spray paying particular attention to the back, flanks, legs, belly and shoulders. Do not use in excess of two (2) ounces per adult animal. Apply proportionately less to smaller animals. Do not soak the skin or wet the hide. Do not make direct application to livestock more frequently than once per day. Care should be taken that the spray does not come in direct contact with the lactating dairy cow's teats unless they are washed with an approved cleansing solution and dried before milking. Brahman and Brahman cross cattle should not be treated as they may show hypersensitivity to organic phosphates.

FOR BARNS, MILK ROOMS AND STABLES:

When used as a space spray, close all doors and windows and direct the spray towards the upper portion of the enclosure until area is filled with a fine mist. Apply at the rate of one ounce spray per 1,000 cubic feet. If a coarse spray is used, apply wherever flies congregate or alight,

until surfaces are moistened. The enclosure should remain closed for 10 to 20 minutes. Repeat as necessary, but no more than once per day. 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.

STORAGE AND DISPOSAL

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

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 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. 47000-108

EPA Est. No. 47000-IA-01

NET CONTENTS:

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

05/13/04