



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 23, 2006

Steven Rogosheske
Chem-Tech LTD
1479 West Pond Road
Egan, MN 62305

Subject: Response to Agency's December 1, 2004 letter regarding occupational risks highlighted in the Tetrachlorvinphos TRED, (risks associated with powder products used on pets and use as premise treatments).

EPA Registration Number: 47000-123

Product Name: Clean Crop Livestock 1% Rabon® Dust

Date of Submission: May 25, 2005

Dear Mr. Rogosheske;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Page 1 of 4:

a. Revise the FIRST AID section as follows:

| FIRST AID Organophosphate | |
|---|---|
| If swallowed | <ol style="list-style-type: none"> 1. Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. 2. Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| If on skin or clothing | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for further treatment advice. |
| If in eyes | <ul style="list-style-type: none"> • 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. 3. Call a poison control center or doctor for treatment advice. |
| HOTLINE NUMBER [Organophosphate] | |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact toll free: (800) 234-2269 for emergency medical treatment information. | |
| NOTE TO PHYSICIAN | |
| This product is a cholinesterase inhibitor, 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. Product may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage. | |

2. Page 2 of 4:

- a. Revise the Personal Protective equipment language in accordance with page 54 of the Tetrachlorvinphos IRED as follows:

“Personal Protective Equipment (PPE)”

“Some materials that are chemical-resistant to this product are”¹“If you want more options, follow the instructions for category”²“on an EPA chemical-resistance category selection chart.”

“Mixers, loaders, applicators and other handlers supporting dusting applications, or applications by paint brush must wear:

- 1. Coveralls over long-sleeved shirt and long pants
- 2. Chemical resistant footwear plus socks
- 3. Chemical resistant gloves
- 4. A NIOSH-approved dust mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or a NIOSH-approved respirator with any N, R, P, or HE filter.”³

- b. Revise the subheader “Application Restrictions:” to **“Application Restrictions:”** Revise the subsection and associated language as follows:

“Application 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.
- Do not use on horses intended for slaughter.”

3. Page 3 of 4:

- a. In accordance with PR Notice 96-6, within the Application Directions for Dogs, Cats revise the language as follows:

“Use 1/3 oz. of powder per every 10 pounds of body weight of your cat or dog. Dust powder evenly over the animal and rub thoroughly through the hair coat to skin. Apply also to feet, between the toes and on the legs for ticks. Fleas will die quickly and can be combed from the hair in a few hours if desired. Ticks are somewhat more difficult to kill and can be combed out of pet’s hair a day or two after application. Do not apply to kittens and puppies under 12 weeks old. **Do not reapply product for 30 days.** Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. 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.”

¹ (registrant inserts correct chemical-resistant material).

² [registrant inserts A,B,C,D,E,F,G,or H]

³ Note: If the product contains oil or bears instructions that will allow application with an oil-containing material, the “N” filter designation must be dropped from the above respirator statement.

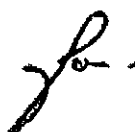
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4. Page 4 of 4:

- a. Remove the subheader "Prohibitions:" from the "STORAGE AND DISPOSAL" section.
- b. Section "Notice" or known by the Agency as Warranty and Disclaimer section needs major modifications. Such text as "Crop injury", weather conditions, must be removed, such terms are meaningless, and do not apply to non-crop pesticides.

If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



George LaRocca
Product Manager 03
Insecticide Branch
Registration Division (7505C)

Enclosure

Clean Crop Livestock 1% Rabon® Dust

Contains Rabon®

A ready-to-use insecticide dust

Controls hornflies and lice and aids in the control of face flies on beef and dairy cattle. Controls lice on or around swine. Controls chicken mites, lice and Northern fowl mites on or around poultry. Controls certain flies, lice, ticks and gnats on or around horses. Controls ticks and fleas on or around dogs and cats.

ACTIVE INGREDIENT:

Tetrachlorvinphos: 2-chloro-1-(2,4,5-trichlorophenyl) vinyl dimethyl phosphate 1%

INERT INGREDIENTS:99%

TOTAL 100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

- If Swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
- If on Skin or Clothing: 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 in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

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

For emergency information contact: 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.

NOTE TO PHYSICIANS AND VETERINARIANS: This product is an organophosphate insecticide. 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 inhibition drugs, pesticides or chemicals.

See Below for Additional Precautionary Statements

ACCEPTED
with COMMENTS
In EPA Letter Dated

JUN 23 2006
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No
47000-123

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequent contact may cause allergic reaction in some individuals. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Personal Protective Equipment (PPE): All handlers must wear long-sleeved shirt and pants, chemical-resistant gloves (such as Barrier Laminate, Nitrile, Butyl and/or Neoprene), shoes plus socks.

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.

USER SAFETY RECOMMENDATIONS

Users should:

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

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 toxic to fish. Drift and runoff may be hazardous to aquatic organisms in adjacent areas. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL BEFORE EACH USE.

APPLICATIONS

Application 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.

No interval is required between treatment and slaughter or between treatment and use of milk for human consumption. Consult a veterinarian before using this product on debilitated, medicated, aged, pregnant or nursing animals.

| Animal | Insect | APPLICATION DIRECTIONS |
|-------------------------------|---|---|
| Beef Cattle & Dairy Cattle | Horn Flies, Face Flies & Lice | <p>SELF-TREATING DUST BAGS: Place this product in cotton cloth or double burlap bags or any commercially available weather-proof cattle dust bags. Protect cloth or burlap bags from weather. Hang the bag so the bottom of the bag will hang four to six inches below the topline of the cattle. For reduction of face flies, the bags must be located so the cattle will use them daily and must be hung to insure the faces of the cattle will be dusted. Regularly inspect dust bags for proper functioning and adequate dust supply. Repair or replace damaged or malfunctioning bags promptly. Recharge with dust as necessary.</p> <p>FORCED USE: Suspend bags in gateways or lanes through which the animals pass daily for water, feed or minerals. Bags may also be suspended in front of protected mineral feeders. For lactating dairy cows, bags may be suspended in milking barn exits.</p> <p>FREE CHOICE USE: Suspend bags in loafing sheds, holding pens, feedlots, near watering holes or other areas where cattle gather daily.</p> <p>HAND DUSTING – Apply approximately 2 oz. of dust by shaker can, rotary duster or by spoon to the tailhead, back, neck and poll and to the face. Rub in lightly to carry the dust beneath the hair, but do not apply with bare hands. Repeat as necessary.</p> |
| Swine | Lice | <p>HAND DUSTING: Apply 9 - 12 ounces of dust by conventional hand or powder duster to each animal with special attention given to the neck and around the ears. Repeat as necessary but not more often than once every 14 days. In severe infestations, both individual animals and bedding may be treated. Three pounds of dust should be applied per 150 square feet of bedding. Do not apply with bare hands.</p> |
| Horses Horse Premises | Face flies, Stable flies, House flies, Horn flies, Horse flies, Deer flies, Lice, Ticks, Gnats and Fly Larvae | <p>Apply approximately 6 oz. by shaker can, hand duster, grooming brush or dust mitt. Cover upper portions of back and neck and to the face, mane and tail for added control of face flies; rub or brush in lightly to carry dust beneath the hair. Do not apply with bare hands. Repeat as necessary.</p> <p>For premise dusting, apply to barn or stall area floors where manure accumulates, to control fly larvae and flies in the stable area.</p> |
| Dogs, Cats | Ticks & Fleas | <p>Use 1/3 oz. of powder per every 10 pounds of body weight of your cat or dog. Dust powder evenly over the animal and rub thoroughly through the hair coat to skin. Apply also to feet, between the toes and on the legs for ticks. Fleas will die quickly and can be combed from the hair in a few hours if desired. Ticks are somewhat more difficult to kill and can be combed out of pet's hair a day or two after application. Do not apply to kittens and puppies under 12 weeks old.</p> |

| | | |
|---------------------|---------------|--|
| Kennels, Dog Houses | Ticks & Fleas | Occasional dusting in and around sleeping quarters and other areas will help free area of ticks and fleas. Dust bedding as well. |
|---------------------|---------------|--|

| POULTRY | | |
|--|--|---|
| Chicken Mites, Lice, Northern Fowl Mites | | |
| Type Housing | Applications | Remarks |
| Wire Cages | 1 lb./100 birds Plunger, rotary type duster or shaker can | For individual treatment direct dust to vent and fluff area. Group treatment may be preferred. Dust should reach skin. Do not repeat more often than every 14 days. Do not apply with bare hands. Wire rungs and corners should also be duster treated. |
| Note: For Northern Fowl Mites on roosters, thorough individual application of the dust will assure long-lasting control and reduce Reinfestation of breeding flocks. | | |
| Floor Management | Application | Remarks |
| Litter | 3 lbs./100 sq. ft. Plunger or rotary type duster | Treat evenly and thoroughly. Also treat roosts, cracks and crevices where pests may hide. |
| Dust Box | 6 lbs./100 birds | Use box about 2 ft. by 2 ft. by 1 ft. deep. |
| Roost Paint | 3 lbs./100 ft. Make thick slurry by mixing 1 lb. of dust with 1 pint of water – continually stir. | Treat roosts thoroughly, particularly the cracks and crevices. |

| STORAGE AND DISPOSAL |
|--|
| Prohibitions: Do not contaminate water, food or feed by storage or disposal. Pesticide Storage: Store in a cool, dry place 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 Disposal: Completely empty container into application equipment. Then dispose of empty container in a sanitary landfill or by incineration, 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. In no case shall Chem-Tech, Ltd, the manufacturer or seller 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. 47000-123

EPA Est. No. 47000-IA-1

NET CONTENTS:

Manufactured by:
Chem-Tech, LTD
Des Moines, IA 50321