

47000-126

06/09/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Monday, June 09, 2008

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, (use as premise treatments).

EPA Registration Number: 47000-126

Product Name: Clean Crop Agri-Bon Aqua 50

Date of Submission: February 29, 2008

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:

Revise the ingredient statement as follows:

"ACTIVE INGREDIENT:

Tetrachlorvinphos: (Z)-2-chloro-1(2,4,5-trichlorophenyl) vinyl dimethyl phosphate.....	50.00%"
OTHER INGREDIENTS:.....	50.00%
TOTAL.....	100.00%"

a. Revise the FIRST AID section as follows:

Directly below the FIRST AID header insert the word "Organophosphate" as shown below:

"

FIRST AID Organophosphate
--

"

2. Page 2 of 4:

- a. Within the Precautionary Statements section, remove the statement "Do not apply to dwellings." And move the statement "Avoid Contamination of feed and food-stuffs" to the new **Application Restrictions** Section described below.¹

¹ This text will be rephrased to "Do Not Use in Residential Areas" to the **Application Restrictions** section within the Directions for Use.

- b. 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”²“If you want more options, follow the instructions for category”³“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.
5. All other mixers, loaders, applicators and other handlers must wear: - long-sleeved shirt and long pants - socks and shoes - chemical resistant gloves for mixers and loaders supporting ground boom applications and all handlers supporting or using backpack spray equipment.”⁴

- c. Directly below the Personal Protective Equipment section described above, insert a new subsection entitled “User Safety Requirements” and associated text as follows:

“User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product’s concentrate. Do not reuse them. “Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.”

- d. Within the Directions for Use, directly below the statement: “It is a violation of Federal law to use this product in a manner inconsistent with its labeling” “Insert a new sub-header “**Application Restrictions:**” and add the new text as shown below:

“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.
- Do not use in residential areas
- Do not apply to the outside surfaces of any domestic animal structures.
- When using a low-pressure handwand, this product can only be used for spot treatments.

² (registrant inserts correct chemical-resistant material).

³ [registrant inserts A,B,C,D,E,F,G,or H]

⁴ 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.

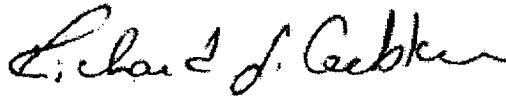
- Avoid contamination of feed and food stuffs⁵.

3. Page 4 of 4:

- Remove the subheader "Prohibitions:" from the "STORAGE AND DISPOSAL" section.
- Revise the table header "PREMISE USE DIRECTIONS" to "INTERIOR DOMESTIC ANIMAL PREMISE USE DIRECTIONS"⁶.

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

⁵ This statement should be moved from the Precautionary Statement section to the new Use Restriction area.

⁶ This change is necessary to clarify that this section is intended only for interior application to animal buildings only.

Clean Crop AGRI-BON AQUA 50

A 50% Wettable Powder with Rabon®

FOR USE AS A LIVESTOCK POULTRY AND PREMISE SPRAY

ACTIVE INGREDIENT:

Tetrachlorvinphos: 2-chloro-1- (2,4,5-trichlorophenyl) vinyl dimethyl phosphate 50%

INERT INGREDIENTS: 50%

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.
- If Inhaled: Remove person to fresh air. If person is not breathing call 911 or an ambulance then give artificial respiration, preferably mouth-to-mouth.

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.

NOTE TO PHYSICIANS AND VETERINARIANS: Poison Symptoms: Symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive pinpoint pupils, salivation, sweating, nausea, vomiting, diarrhea, and abdominal cramps.

Treatment: Tetrachlorvinphos 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. Atropine is antidotal only if symptoms of cholinesterase inhibition are present. 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 9 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
47000-126

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 thoroughly with soap and water after handling. Avoid contamination of feed and food-stuffs. Do not apply in dwellings. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE): Some materials that are chemical-resistant to this product are, Butyl rubber, PVC or Viton. If you want more options, follow the instructions for category A or C on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators and other handlers supporting or using low-pressure handwand equipment or applying by paint brush must wear: Coveralls over long-sleeved shirt and long pants, chemical resistant footwear plus socks, chemical resistant gloves, a NIOSH-approved dust mist filtering respirator with MSHA/HIOSH approval number prefix TC-21C or a NIOSH-approved respirator with any N, R, P, or HE filter.

All other mixers, loaders, applicators and other handlers must wear long-sleeved shirt and pants, shoes plus socks; chemical-resistant gloves for mixers and loaders supporting ground boom applications and all handlers supporting or using backpack spray equipment.

User Safety Requirements: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, 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/PPE 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. 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 wastewater or rinsate.

DIRECTIONS FOR USE

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

GENERAL DIRECTIONS

This product is suitable for use in conventional power or low pressure knapsack sprayers. Occasional agitation is recommended to prevent undue setting of the suspension. Follow the USE DIRECTIONS for the proper percent solution needed for a specific insect and areas or types of wall surfaces. Refer to

DILUTION TABLE for the quantity of insecticide needed to make the percent solution recommended.

General Application Restrictions

For **Indoor Use Only**, not for use outdoors. Do not enter or allow others to enter until sprays have dried. 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.

DILUTION TABLE

Amount of this product to use (Pounds)	Amount of Water For			
	0.35% Solution (Gallons)	0.5% Solution (Gallons)	1.0% Solution (Gallons)	2.0% Solution (Gallons)
1/2	9	6	3	1 1/2
2	36	25	12 1/2	6
4	75	50	25	12 1/2
8	150	100	50	25

LIVESTOCK USE DIRECTIONS

Animal	Insect	% Solution	REMARKS
Beef Cattle	Horn Flies, Lice	0.35%	Apply as coarse spray. Use between 1/2 and 1 gallon of spray per animal depending on size and hair coat. There is no withholding period from last application to slaughter.
	Lone Star Ticks	0.5%	
Swine	Lice	0.5%	Apply as a coarse spray using 1 to 2 quarts per head to thoroughly wet the animal. Repeat in 2 weeks if necessary.

POULTRY USE DIRECTIONS

Insects	Type of Housing	% Solution	Remarks
Lice, mites	Wire Cages	0.5%	Apply directly to birds (1 gal./100 birds), spray vent and fluff areas from below. Repeat when necessary. Do not repeat more often than every 14 days. For individual bird treatment apply 1 ounce of the mixture per bird.
Note: For maximum lasting control of the Northern Fowl Mite penetration of the feathers around the vent area is absolutely essential. Use power sprayer at 100-125 psi at NO LESS THAN RECOMMENDED RATE . More attention must be given each individual bird when using low-pressure equipment. Treat roosters carefully and thoroughly to avoid Reinfestation in breeding flocks.			
	Floor Management		For control of Northern Fowl Mite and Darkling Beetles
	Litter	0.5%	Apply 1 - 2 gallons/1,000 sq. ft. evenly for penetration to litter surfaces. Also apply thoroughly to walls, roosts, cracks, crevices and interiors. Spray birds lightly.
	Litter	50% WP	Treat evenly and thoroughly using 2.5 oz./100 sq. ft.
	Dust Box	50% WP	Mix evenly throughout top layer of box contents using 2.5 oz./50 birds.
	Roost Paint	1.0%	Treat with brush or spray thoroughly, particularly cracks and crevices using 1 pt./100 feet.
Fowl Tick (Blue Bug)	All Types	1.0%	Apply 1 gal./100-150 sq. ft. thoroughly to walls, ceiling, floor cracks and crevices with a power sprayer.

PREMISE USE DIRECTIONS

Insect	Problem Areas*	% Solution	Remarks
Flies	Dairy barns, poultry houses, swine barns – other animal buildings	2.0%	For dry whitewashed wood or concrete block surfaces - 1 gallon of solution/500 sq. ft.
		1.0%	For unpainted wood or painted concrete block surfaces - 1 gallon of solution/500 sq. ft.
		1.0%	For masonite or galvanized sheet metal surfaces – ½ gallon of solution /500 sq. ft.
Maggots	Poultry droppings, manure piles. Garbage piles, under feed troughs	1.0%	Apply 1 gallon of mixed solution/100 sq. ft. Penetrate problem area first time – repeat every 7 – 10 days thereafter.

*When using a low-pressure handwand, this product may only be used for spot treatment

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 bag into application equipment. Then dispose of empty bag 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. 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 consistent with applicable 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. Except as warranted by this label, 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 or use of the product, including, but not limited to, merchantability, fitness for a particular purpose or use, or eligibility of the product for any particular trade usage. To the extent consistent with applicable law, Buyer's or user's exclusive remedy, and Chem-Tech, Ltd's, the manufacturer's or seller's total liability shall be limited to damages not exceeding the cost of the product.

EPA Reg. No. 47000-126

EPA Est. No. 47000-IA-1

NET CONTENTS:

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