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DEC 24 1984

Ms. Dolores Dwyer
Tri Ag Supply, Inc
P.O. Box 466
Harvard, IL 60033

Dear Ms. Dwyer:

Subject: Amendments - Revised Formula Statement
Revised Finished Label
R.O.L. Premix 7.76%
EPA Registration No. 49338-1
Your submission dated August 6, 1984

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided the following revisions are made prior to release for shipment:

1. The label appears to come in two parts, a complete cattle and swine label, and a supplemental partial label for mink. Either the mink use must be consolidated into the main label body, including reference to the control of house flies and blow flies in the manure of treated mink on the top panel claims, deletion of "GENERAL CLASSIFICATION" (since the use in mink feed has not yet been classified), addition of the "general information" on mink (minus that heading) under the fifth asterisk of the directions for use, and relocation of the mink feeding directions (using the subheading MINK) after the swine feeding directions, or else the mink use information and directions must be labeled as "SUPPLEMENTAL LABEL", marketed along with the basic label, and must refer back to the basic label for precautionary statements, ingredients statement, and directions for storage and disposal.
2. Replace the Pesticide Disposal section with the following:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
3. Since the main front panel signal word appears in close proximity, you may delete CAUTION which appears directly under the heading "HAZARDS TO HUMANS".

Please submit five copies of the revised finished labeling, either consolidated or basic plus supplemental, prior to release for shipment.

While the revised formula statement is acceptable and has been added to this product's registration file and the calculations presented in ADDENDUM A are correct, both these items still do not support the claim of your certified limits for a 10.1% to 10.6% product. Perhaps the certified limits submitted with your original application were incorrect. Please clarify.

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Also, your submission did not address the required certified limits for the intentionally added inert ingredients as detailed on the Notice of Registration for this product. Please submit correct certified limits for both the active and intentionally added inert ingredients included in your formulation.

Sincerely, yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (15-767)

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(Contains RABON Insecticide)

To prevent the development of Horn Flies, House Flies, Face Flies and Stable Flies in the manure of treated cattle and House Flies by the manure of treated swine

ACTIVE INGREDIENT
2-Chloro-1-(2,4,5-trichlorophenyl) vinyl dimethyl phosphate
NET WEIGHTS
TOTAL

BY WEIGHTS
7.76%
97.24%
100.00%

*Ratons and ingredients which are not to be treated
**RABON Insecticide Contains 35 grams of RABON per pound
RABON is the registered trademark of Shell Oil Company
U.S. Patent No. 3,102,847

KEEP OUT OF REACH OF CHILDREN CAUTION

See below for additional precautionary statements

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS CAUTION

Harmful if swallowed. Avoid contact with skin and eyes. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating or smoking. If in eyes, wash with plenty of water for 15 minutes. If irritant, see a physician.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE GENERAL CLASSIFICATION

- * It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- * Rations containing this product may be fed up to slaughter and to lactating dairy cows without withholding the milk from market during or after treatment.
- * Start feeding RABON larvicidal feeds early in the spring before flies begin to appear and continue feeding throughout the summer and into the fall until cold weather restricts fly activity.
- * When fed, this product passes through the digestive system into the animal's manure where it kills fly larvae on contact shortly after fly eggs hatch.
- * It prevents the development of horn flies, face flies, house flies, and stable flies in the manure of treated cattle and house flies in treated swine, but it is not effective against existing adult flies.
- * In some cases, supplemental fly control measures may be needed in yard ground or in lots and barns to control adult house flies and stable flies which can breed not only in manure but in other decaying vegetable matter or sludge on the premises.
- * In order to achieve optimum fly control this product should be used in conjunction with other good management and sanitation practices.
- * This product will mix uniformly in feed when standard mixing procedures are followed. Thus, usual problems that are common to all feed preparation and which cause stratification, such as excessive free feed or excessive handling are to be avoided. It is recommended that appropriate preblending techniques be employed to assure adequate distribution throughout the feed mix. The grounds should be preblended with ground grain, protein supplement, mineral mixes, etc. before being added to roughages, such as chopped hay or stags. Mixing time should be adequate to assure uniform dispersion. Optimum performance can be assured only if this product is dispersed uniformly with the feedstuff at the recommended level. Common feed mixing equipment (i.e., vertical mixers, horizontal blenders, mixer-feeders, trucks) may be used to prepare formulated feeds.
- * Feeds prepared with this product should not be pelleted, nor be mixed with feeds containing predominantly pellets. Further, this product should not be mixed in liquid feed supplements.

CATTLE - In a concentrate feed Roughage Fed Separately

- * This product can be used to prepare concentrate feeds that will provide 792 mg. of RABON per animal per day.
- * To prepare concentrate feeds mix this product according to the amount of concentrate to be fed per animal per day. Use the following table as a guide for determining the proper mixing rate.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MIXING DIRECTIONS FOR CATTLE

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Pounds of Concentrate Consumed per animal per day
5
10
15
20
50
100
150
200
250
300

RABON in the Concentrate	
mg/lb	%
1584	0.35
792	0.18
528	0.12
396	0.087
156	0.035
79	0.018
53	0.012
39	0.0087
32	0.0069
26	0.0059

Pounds of this product per ton of Concentrate
90.0
45.0
30.0
22.5
9.0
4.5
3.0
2.3
1.8
1.5

* Feed the appropriate larvicidal concentrate to cattle weighing between 400 and 1200 pounds. For larger cattle weighing between 1200-1700 pounds, increase the amount of product per ton of concentrate to 1 1/2 times that recommended.

CATTLE - In a Complete Ration No Other Roughage Fed

- * This product can be used to prepare rations that contain 26.4 mg. of RABON per pound of complete ration.
- * To prepare a larvicidal ration mix 1.5 pounds of this product per ton of complete mixed ration containing both grain and roughage.
- * Full feed this larvicidal complete ration to feeder cattle weighing from 400 to 1400 pounds or to dairy cattle at a rate to sustain milk production, but not less than 2.5 pounds of the ration per 100 pounds of body weight daily.

SWINE - All swine should be treated

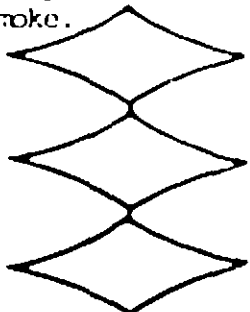
- Pigs (weaners to market weight)
- * Mix 1.3 lbs. of this product per ton of meal type feed and offer free choice. This is equivalent to 22.7 mg. of RABON per lb. of feed.
- Sows, Breds and Breeding Gilt
- * Mix 2.6 lbs. of this product per ton of meal type feed and offer 4.6 lbs. of feed per animal per day. This is equivalent to 45.4 mg. of RABON per lb. of feed.

STORAGE AND DISPOSAL

PESTICIDE DISPOSAL: "Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance."

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 & Local Authorities, by burning. If burned, stay out of smoke.

EPA Reg. No. 49338-1
EPA Est. No. 49338-IL-01



NET WEIGHT 50 POUNDS

MANUFACTURED BY
Tri Ag Supply Inc.
HARVARD, ILLINOIS 60033

For Use In Mink Feed
To Prevent The Development Of Fly Larvae
In The Droppings Of Treated Mink

General Description

When fed to mink, Rabon passes through the digestive system into the droppings where fly larvae are killed on contact shortly after the fly eggs hatch. Rabon helps to control the development of house flies and blow flies but should not be used as the sole method of fly control.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product will mix uniformly in mink feeds when standard mixing procedures are followed. It is recommended that appropriate preblending techniques be employed to assure adequate distribution of this product throughout the feed mix. It should be preblended with soybean meal, alfalfa meal, mineral mix, etc. before being added to other ingredients. Common feed mixing equipment (i.e. vertical mixers, horizontal blenders) may be used to prepare formulated feeds.

This product should be added to the total feed at a rate that will ensure that each animal will consume 3 mg/kg of body weight (1-2 mg/pound) per day. Use the following table as a guide.

Mixing Directions

Pounds of Food Consumed per Animal per day	Pounds of Rabon 7.76 Oral Larvicide Premix in Food		
	500 Lb.	1000 Lb.	2000 Lb.
0.10	0.8	1.6	3.2
0.25	0.3	0.6	1.2
0.33	0.25	0.5	1.0
0.5	0.2	0.4	0.8
0.75	0.1	0.2	0.4
1.00	36 gram	72 gram	140 gram

Start feeding this larvicide feed early in the spring before flies begin to appear and continue feeding throughout the summer until cold weather restricts fly activity. In some cases supplemental fly control measures may be needed in and around the animal facilities and feed building to control adult flies, especially house flies that can breed in many kinds of organic matter. Blow flies breed on dead animals or meat from dead animals.

In order to achieve optimum fly control this product should be used in conjunction with other good management and sanitation practices.

Note: It is important to read and observe the cautionary statements and all other information appearing on the Rabon 7.76 Oral Larvicide Premix label. Use only as directed.

Note: This labeling must be in the possession of the user at the time of pesticide application.

WARRANTY AND LIMITATION OF DAMAGES. SELLER warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. The BUYER assumes the risk of any use contrary to such directions. SELLER makes no other express or implied warranty, including any other express or implied warranty of FITNESS OR OTHER MERCHANTABILITY, and no agent of SELLER is authorized to do so except in writing with specific reference to this warranty. In no event shall SELLER's liability for any breach of warranty exceed the purchase price of the material at the time of sale.