

55392-3

10/25/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

October 25, 2007

Ms. Carolyn Brady, Brand Manager  
Manna Pro Products, LLC  
707 Spirit 40 Park Drive, Suite 150  
Chesterfield, MO 63005-1137

**Subject: Response to EPA Letter Dated June 14, 2006  
Manna Pro Fly-B-Gone Mineral Block, EPA Registration No. 55392-3  
Your Submission Dated July 13, 2006**

Dear Ms. Brady:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

General Statement:

1. Delete all text throughout the label marked with "strikethrough."

User Safety Recommendations section comment(s), page 2 of 3:

2. In sentence #1, insert the words "thoroughly with plenty of soap and water" immediately following the word "hands."
3. At the end of this section, replace the words "As soon as possible." with: "As soon as possible, was thoroughly and change into clean clothing."

First Aid section comment(s), page 2 of 3:

4. In the subsection entitled "If on skin or clothing," delete the word "open" in the first bulleted statement.
5. Replace the subsection starting with "Have the product container or ...." with: "Have the product container or label with you when calling a poison control center or doctor, or going for treatment. **For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-530-5432 or the National Pesticide Information Center at 1-800-858-7378.**"<sup>1</sup>

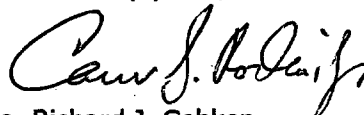
Directions for Use section comment(s), page 2 of 3:

6. Insert the following text at the end of the 3<sup>rd</sup> bulleted use restriction: "This product has not been tested in breeding horses."

<sup>1</sup> Please note that the "1-800-530-5432" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions. A stamped copy of the label is enclosed for your records. If you have any questions, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely yours,



FOR Richard J. Gebken,  
Product Manager (10)  
Insecticide Branch,  
Registration Division (7505P)

Enclosure

055392-00003 D-368267

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NET WEIGHT 33 1/3 LBS

# FLY B GONE MINERAL BLOCK

W/RABON® ORAL LARVICIDE  
FOR WEANED CATTLE AND HORSES  
ON PASTURE

Control of flies in the manure of treated cattle and maintenance horses on pasture. Prevents development of face flies, horn flies, house flies and stable flies in the manure of treated cattle and horses.

**Active ingredient:** Tetrachlorvinphos\* [(Z)-2-Chloro-1-(2,4,5-trichlorophenyl)ethenyl dimethyl ester, phosphoric acid].....0.30%

**Other:\*\*** .....  
99.70%

**Total:**  
100.00%

\*Each pound contains 1.36 grams RABON®

\*\*Refers only to ingredients which are not larvicidal

### GUARANTEED ANALYSIS

Crude Protein.....	(Min) .....	14.00%
Crude Fat.....	(Min) .....	1.00%
Crude Fiber.....	(Max) .....	5.00%
Calcium.....	(Min) .....	5.50%
Calcium.....	(Max) .....	6.50%
Phosphorus.....	(Min) .....	1.00%
Salt.....	(Min) .....	17.00%
Salt.....	(Max) .....	20.40%
Magnesium.....	(Min) .....	1.00%
Potassium.....	(Min) .....	2.00%
Copper.....	(Min) .....	300 PPM
Selenium.....	(Min) .....	4.40 PPM
Zinc.....	(Min) .....	2,300 PPM
Vitamin A.....	(Min) .....	30,000 IU/LB
Vitamin D <sub>3</sub> .....	(Min) .....	7,500 IU/LB
Vitamin E.....	(Min) .....	25 IU/LB

### NON-PESTICIDAL FEED ANALYSIS

**PRECAUTIONARY STATEMENTS:**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid breathing dust. Prolonged or frequently repeated skin contact may cause an allergic reaction in some individuals.

**Environmental Hazards:**

This pesticide is toxic to fish. Do not apply directly to any body of water. Do not contaminate water by cleaning of equipment or disposal of waste.

**Personal Protective Equipment (PPE)**

Mixers and Handlers must wear

- a long-sleeved shirt
- pants
- shoes and socks,
- and chemical resistant gloves.

**User Safety Recommendations**

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible.

**FIRST AID**

**organophosphate**

**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 open 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 the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment

advice.

**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor or going for treatment. For emergency medical advice, call (816)232-2525 OR (800)530-5432.

Storage and Disposal

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**Storage and Disposal:** Do not contaminate water, food, or feed by storage or disposal. Store in a dry place in original container.  
**Container Disposal:** Dispose of empty wrapper or container in a sanitary landfill by incineration. Or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.  
**Pesticide Disposal:** Waste resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

**DIRECTIONS FOR USE:** IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. RABON® MAY NOT BE USED IN COMBINATION WITH OTHER CHOLINESTERASE INHIBITORS.

PROVIDE ONE BLOCK PER 15-20 HEAD OF CATTLE OR HORSES. ADD AN ADDITIONAL BLOCK WHEN EACH BLOCK HAS BEEN ONE-HALF CONSUMED. CONSUMPTION SHOULD AVERAGE 0.83 OZ. OF THE BLOCK PER 100 LBS. OF BODY WEIGHT PER HEAD PER DAY. THIS WILL SUPPLY THE RECOMMENDED AVERAGE DAILY INTAKE OF 70 MG. RABON® ORAL LARVICIDE PER HUNDRED POUNDS OF BODY WEIGHT. ANIMALS SHOULD NOT BE STARVED FOR MINERALS BEFORE INITIATION OF THE FLY B GONE MINERAL BLOCK PROGRAM. OMIT ALL SALT FROM OTHER FEED AFTER INITIATION OF THE PROGRAM. DO NOT FEED FREE CHOICE SOURCES SALT OR MINERAL CONTAINING SALT IN ANY FORM. PLACE NEAR WATERING AND LOAFING AREAS. PROTECT THE FLY B GONE BLOCK FROM RAIN.

IF CONSUMPTION OF MANNA PRO FLY B GONE MINERAL BLOCK IS ABOVE 0.85 OZ. OF THE BLOCK PER 100 LBS. OF BODY WEIGHT PER DAY, REDUCE THE NUMBER OF FEEDING LOCATIONS OR RELOCATE THE BLOCKS. IF CONSUMPTION OF THE FLY B GONE IS BELOW 0.83 OZ. OF THE BLOCK PER 100 LBS. OF BODY WEIGHT PER DAY, INCREASE THE NUMBER OF FEEDING LOCATIONS. START FEEDING MANNA PRO FLY B GONE MINERAL BLOCK EARLY IN THE SPRING BEFORE FLIES BEGIN TO APPEAR. CONTINUE FEEDING THE BLOCK THROUGHOUT THE SUMMER AND FALL.

MANNA PRO FLY B GONE MINERAL BLOCK MAY BE FED TO BEEF CATTLE UP TO SLAUGHTER, DAIRY CATTLE, AND HORSES AT THE APPROVED RATE OF .85 OZ. OF BLOCK PER 100 LBS. BODY WEIGHT PER DAY.

**WARNING:** THIS PRODUCT IS NOT TO BE USED IN HORSES DESTINED FOR SLAUGHTER.

~~THIS PRODUCT CONTAINS TETRACHLORVINPHOS, WHICH IS A CHOLINESTERASE INHIBITOR. THE MOST FREQUENTLY REPORTED CLINICAL SIGNS OF CHOLINESTERASE INHIBITION IN THE HORSE ARE ABDOMINAL PAIN, LETHARGY, SWEATING, TEARING AND EXCESSIVE SALIVATION. IF THESE SIGNS ARE SEEN IN HORSES, CONSULT YOUR VETERINARIAN IMMEDIATELY. DO NOT USE THIS PRODUCT SIMULTANEOUSLY OR WITHIN A WEEK BEFORE OR AFTER TREATMENT WITH CHOLINESTERASE INHIBITING DRUGS, PESTICIDES OR CHEMICALS. CONSULT A VETERINARIAN BEFORE USING THIS PRODUCT ON DEBILITATED, AGED, PREGNANT OR NURSING ANIMALS. THIS PRODUCT HAS NOT BEEN TESTED IN BREEDING HORSES.~~

Delete.

Delete.

MANNA PRO FLY B GONE MINERAL BLOCK PREVENTS THE DEVELOPMENT OF FACE FLIES, HORN FLIES, HOUSE FLIES AND STABLE FLIES IN THE MANURE OF TREATED CATTLE OR HORSES. THIS PRODUCT IS NOT EFFECTIVE AGAINST EXISTING ADULT FLIES. WHEN STARTING A FLY B GONE MINERAL BLOCK FEEDING PROGRAM DURING THE FLY SEASON, IT IS ADVISABLE TO USE OTHER CONTROL MEASURES TO REDUCE THE POPULATION OF EXISTING ADULT FLIES.

IN ORDER TO ACHIEVE OPTIMUM FLY CONTROL, MANNA PRO FLY B GONE MINERAL BLOCK SHOULD BE USED IN CONJUNCTION WITH OTHER GOOD MANAGEMENT, SANITATION PRACTICES, AND OTHER SUPPLEMENTAL FLY CONTROL PRACTICES AS DETERMINED TO BE NECESSARY.

**STORAGE AND DISPOSAL:** DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL. STORE IN A DRY PLACE IN ORIGINAL CONTAINER.

**CONTAINER DISPOSAL:** DISPOSE OF EMPTY WRAPPER OR CONTAINER IN A SANITARY