DU 15 16 1990 Pg. 1076

Mr. Bruce Bernard Scientific Research Associates, Inc. 1220 19th Street, N.W. Suite 202 Washington, D.C. 20036 345 261266

Dear Mr. Bernard:

Subject: Tetrachlorvinphos Registration Standard

75% Rabon Insecticide WP EPA Registration No. 56493-19 Rabon Orel Varvicide Base EPA Registration No. 56493-38

Your Submissions Dated September 5, 1989 and March 5, 1990

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide, Act, as amended, is acceptable, provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

1. The Agency finds your acute studies acceptable. Based on your product's acute toxicities the following categories were assigned.

	STUDY CLASS.	TOX CAT MRID#
ACUTE ORAL LD ₅₀	Core Minimum	III 412236-01
ACUTE DERMAL LD ₅₀	Guideline	III 412236-02
EYE IRRITATION	10	III 412236-03
SKIN IRRITATION	•	IV 412236-04
DERMAL SENSITIZATION	Core Minimum	412236-05

The Acute Oral Study is classified as core minimum for the following reasons:

- a. Individual animal data (symptoms) were not included.
- b. Necropsy findings were not reported
- c. Excessive number of animals used

The Agency encourages efficient use of test animals. Testing should be done so that the number of animals needed is reduced without adversely affecting the statistical significance of the test system (see Pesticide Assessment Guidelines, Subdivision F).

Helen 7-9-80

The Dermal Sensitization Study is classified as core minimum because results of induction exposures for individual animals were not included.

2. Revise the Statements of Practical Treatment to read as follows:

IF SWALLOWED: Call a physician of Poisc Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF IN EYES: Flush with plenty of water. Call a physician if irritation persists.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

3. Revise Precautionary Statements to read as follows:

Harmful if swallowed, abscrbed through skin or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wear long-sleeved shirt and pants; chemical resistant gloves; shoes and socks for protection when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

4. We have not received updated labels revised in accordance with the Tetrachlorvinphos Registration Standard for these products. Please submit

Product Chemistry data for 75% Rabon Insecticide WP have been reviewed and found acceptable. You state that the storage stability data for Rabon Oral Larvicide Manufacturing Base will be satisfied by DuPont. Please provide the MRID No. for this data reference.

Submit five copies of your final printed labeling before you release the product for shipment.

Sincerely,

George T. LaRocca Product Manager 15 Insecticide-Rodenticide Branch Registration Division (H7505C)

Enclosure

cc: Joanne Edwards Reregistration Division Fermenta Animal Health

75% RABON. INSECTICIDE WETTABLE POWDER An Insecticide for Formulating Use Only

Active Ingredient	
By Weight Tetrachlorvinphos: 2-Chloro-1-(2,4,5-trichlorophenyl) vinyl	
dimethyl phosphate	75.0%
Inert Ingredients:	25.0%
Total	100.01

Keep Out of Reach of Children
CAUTION
See side panel for precautionary statements

Fermenta Animal Health Co. 2.0. Box 901350 Kansas City, MO 64190~1350 Net Weight: 100 Pounds (45.4KG)

EPA Reg. No. 56493-19

16 1000 Constitution 10 SEPATION 5 6439-19

SIDE PANEL 56493-19

STATEMENT OF PRACTICAL TREATMENT

If swallowed - Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Call a physician immediately. Do not induce vomiting or give anything by mouth to an unconscious person.

If inhaled - Remove victim to fresh air. Apply respiration if necessary.

If on skin - Remove contaminated clothing and wash affected areas with soap and water.

If in eyes - Flush eyes with plenty of water. Call a physician if irritation persists.

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. Wear long-sleeved shirt and pants; chemical resistant gloves; shoes and socks for protection when handling.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in a National Pollutant Discharge Elimination System (NPDES) permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or the Regional Office of EPA.



SIDE PANEL 56493-19

Do not contaminate water, food or feed by storage or disposal. Storage - Store in a dry place in original container. Disposal - Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mixing equipment. Then dispose of liner in a sanitary landfill or by incineration, if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner. Wastes resulting from the use of this product may be disposed of on site or at an approved

WARRANTY & LIMITATION OF DAMAGES

waste disposal facility.

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 and 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 of Merchantability, and no agent or Seller is authorized to do so except in writing and 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 as to which a claim is made.

DIRECTIONS FOR USE

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

An insecticide for formulating into end-use insecticide products intended only for terrestrial (non-food) use, for use on domestic animals and their man-made premises and/or for domestic pets. Use only in the formulation of dust or wettable powder products by dilution.

Formulators using this product are responsible for obtaining EPA registration of their formulated product.

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