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

January 14, 2011

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Mr. Hubert R. O'Neal, Ph.D., Regulatory Consultant KMG-Bernuth, Inc. 9555 W. Sam Houston Pkwy. S., Suite 600 Houston, TX 77099-2168

Subject: Amended Labeling; Updates for PR Notice 2007-4 RABON[®] 50 WP INSECTICIDE, EPA Reg. No. 61483-43 Your Submission Dated August 19, 2010

Dear Mr. O'Neal:

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 label revision provision(s):

First Aid section comment(s), page 1 of 7:

1. Revise the 2nd sentence within the "HOTLINE NUMBER" subsection to read "For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call CHEMTREC at 1-800-424-8177, 24 hours per day, 7 days per week."

Directions for Use section comment(s), page 4 of 7:

2. Revise the misspelled "GENEARAL APPLICATION RESTRICTIONS:" subsection heading to read "USE RESTRICTIONS:"

Storage and Disposal Statement section comment(s), page 7 of 7:

- 3. Revise the existing "**PESTICIDE STORAGE:**" subsection to read "**PESTICIDE STORAGE:** Store product in its original container in a cool, dry place in an area that is inaccessible to children and animals."
- 4. Revise the existing "CONTAINER DISPOSAL:" subsection to read "CONTAINER DISPOSAL: Nonrefillable container. Do not refill or reuse empty container. Completely empty bag into application equipment. Dispose of empty bag in a sanitary landfill, or incinerate, or by other procedures approved by state and local authorities."

A copy of your label stamped "Accepted with Comments" is enclosed for your records. 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 section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at *Rodia.Carmen@epa.gov*.

Sincerely yours

Richard J. Gebken Product Manager (10) Insecticide Branch Registration Division (7504P)

Enclosure: 061483-00043 D441418

Copy of label stamped "Accepted with Comments"

Page 1 of 7 Rabon 50 8/19/10

RABON 50 WP INSECTICIDE

Livestock, Poultry and Premise Spray

ACTIVE INGREDIENT:

Tetrachlorvinphos (CAS# 22248-79-9)	
OTHER INGREDIENTS:	
TOTAL:	
*RABON Insecticide	

EPA Reg.No. 61483-43

EPA Est. No. 44616-MO-01

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 give anything by mouth to an unconscious person. Do not induce vomiting unless told to by a poison control center or doctor.

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 the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth, if possible. Call a poison control center or doctor for further treatment advice.

HOTLINE NUMBER

Contains an organophosphate that inhibits cholinesterase.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-322-8177 for emergency medical treatment.

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.

FOR CHEMICAL EMERGENCY. Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300.

Mfd. For: KMG-Bernuth, Inc

9555 W. Sam Houston Pkwy. S., Ste 600 Houston, Texas 77099-2168 (800) 322-8177 Net Weight: 4 Lbs/1.8 Kg

ACCEPTED With COMMENTS In EPA Letter Dated: January 14,2011 Under the Federal Insecticide, Fundicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

Page 2 of 7 Rabon 50 8/19/10

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. 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 manner of use or application, presence of other materials or other influencing factors in the use of the product, which are beyond the control of **KMG-BERNUTH**, **INC** or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold **KMG-BERNUTH**, **INC** and Seller harmless for any claims relating to such factors.

KMG-BERNUTH, INC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or **KMG-BERNUTH, INC**, and Buyer and User assume the risk of any such use **KMG-BERNUTH, INC** MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

It is KMG-BERNUTH, INC intention that to the extent allowable under state law, KMG-BERNUTH, INC or the Seller shall not be liable for any incidental consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF KMG-BERNUTH, INC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGILIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF KMG-BERNUTH, INC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

KMG-BERNUTH, INC and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of **KMG-BERNUTH, INC**.

Page 3 of 7 Rabon 50 8/19/10

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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CAUTION

Harmful if inhaled, swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction to some individuals. Wash thoroughly with soap and water after handling.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are butyl rubber, neoprene and polyvinyl chloride (PVC). If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators and other handlers supporting dusting applications, low-pressure hand wand applications or applications 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/NIOSH 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 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.

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 contaminated with this product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

Users should:

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

Page 4 of 7 Rabon 50 8/19/10

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wastewater or rinsate. This product is toxic to bees exposed to direct treatment. Do not 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 the entire label prior to use.

This product is a ready to use insecticide dust. There is no withholding period from last application to slaughter. Apply as directed.

USE RESTRICTIONS

For Outdoor Premise Products: Restrict uses to only spot treatments. Apply only one time per year. The product is to be used along woody borders of kennels, yard, campgrounds, recreational parks, and footpaths and roadways leading to such areas.

Cover or remove all food/feed and water prior to use of this product. Do not apply this product during dairy milking operations.

Non-Agricultural Use Restrictions

Do not enter or allow others to enter until dusts have settled. Do not enter or allow others to enter until sprays have dried.

GENEARAL APPLICATION RESTRICTIONS:

Do apply this product in a way that will contact workers or other person either directly or through drift. Only protected handlers may be in the area during application. Do not enter or allow others to enter the treated areas until sprays have dried. When using a low-pressure handwand, this product may only be used for spot treatment.

CALIFORNIA: Use a light spray on cattle or swine only to the point of runoff. Sprays leading to runoff are not permitted in California. Do not spray manure pile/storage or garbage storage areas out-of-doors where runoff to soil or water can occur. Do not use on campgrounds, yards, picnic areas, recreational parks or other outdoor living areas in California.

RABON 50 WP is suitable for use in conventional power or low pressure knapsack sprayers. Frequent agitation is recommended to prevent undue settling of the suspension. Follow the USE directions for the proper percent dilution 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.

Page 5 of 7 Rabon 5 8/19/10 60f8

LIVESTOCK USE DIRECTIONS			
ANIMALS	INSECT	%	REMARKS
		SOLUTION	
Beef Cattle	Horn Flies, Lice	0.35%	Use a low pressure coarse spray and apply only to point before runoff. Use between $\frac{1}{2}$ to 1 gallon of spray
	Lone Star Ticks	0.5%	solution per animal depending on size and hair coat. There is no withholding period from last application to slaughter
Swine	Lice	0.5%	Apply as a low pressure coarse spray and apply only to point before runoff. Use 1 to 2 quarts maximum of solution per head to treat. Repeat in 2 weeks if necessary. There is no withholding period from last application to slaughter

LIVESTOCK USE DIRECTIONS

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POULTRY USE DIRECTIONS

INSECT	TYPE OF	%	REMARKS
	HOUSING	SOLUTION	
Lice & Mites	Wire Cages	0.5%	Apply directly to birds (1 gal/100 birds). Spray vent and fluff 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 control of the northern fowl mite, penetration of the feathers around the vent area is essential. Use power sprayer at no less than 100-125 psi. More attention must be given to individual birds when using low-pressure equipment. Treat roosters carefully and thoroughly to avoid reinfestation in breeding flocks.
	Floor Management Dust Box	50% WP	Mix evenly throughout top layer of box contents using 2.5 oz/50 birds.
	Floor Management Roost Paint	1.0%	Treat with brush or spray thoroughly, particularly cracks and crevices using 1 pt/100 ft.

Page 6 of 7 Rabon 50 8/19/10

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Litter Beetles	Floor Management Litter	0.5%	Apply 1-2 gal/100 sq. ft. evenly for penetration of litter surface. Also apply thoroughly to walls, roost cracks, crevices and interior to point of run-off.
	- - - -	50% WP	Treat evenly and thoroughly using ³ ⁄ ₄ oz/100 sq. ft. Use rotary, mechanical or electrostatic duster.
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.

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PREMISES USE DIRECTIONS

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INSECT	PROBLEM AREAS	%	REMARKS
		SOLUTION	
Flies	Dairy barns, poultry Houses, swine barns- other animal buildings	2.0%	For dry whitewashed wood or concrete block surfaces use 1 gal of solution/500 sq. ft.
		1.0%	For unpainted wood or painted concrete block surfaces, use 1 gal of solution/500 sq. ft.
		1.0%	For masonite or galvanized sheet metal surfaces, use ½ gal of solution/500 sq. ft.
Maggots	Poultry droppings, manure piles, garbage piles, under feed troughs	1.0%	Apply 1 gal of mixed solution/100 sq. ft. Penetrate problem area first time. Repeat every 7-`10 days thereafter.

Page 7 of 7 Rabon 50 8/19/10

OUTDOOR USE DIRECTIONS

INSECT	PROBLEM AREAS	% SOLUTION	REMARKS
Fleas, Ticks, Chigger Mites	Kennels, yards, campgrounds, picnic areas and recreational parks	0.5% (4 ounces in 3 gallons of water treats 5000 sq. ft.)	Apply as a spot treatment using a low pressure handwand sprayer only. Apply along woody borders of kennels, yards, campgrounds, recreational parks, footpaths, and roadways leading to such areas.

DILUTION TABLE

AMOUNT OF	AMOUNT OF WATER FOR			
RABON	0.35%	0.5%	1%	2%
WETTABLE	SOLUTION	SOLUTION	SOLUTION	SOLUTION
POWDER				
1/2 Lb.	9 Gal.	6 Gal.	3 Gal.	1½ Gal.
2 Lb.	36 Gal.	25 Gal.	121⁄2 Gal.	6 Gal.
4 Lb.	75 Gal.	50 Gal.	25 Gal.	12½ Gal.
8 Lb.	150 Gal.	100 Gal.	50 Gal.	25 Gal.

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in cool dry location in original container.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site in accordance with the label directions or at an approved waste disposal facility. Open dumping is prohibited.

CONTAINER DISPOSAL: Nonrefillable container. DO NOT reuse empty container. Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or incinerate, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

RABON® Is a trademark of KMG-BERNUTH, INC.