

61483-48

03/10/2006

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Dr. Hubert R. O'Neal, Regulatory Consultant
KMG Bemuth, Inc.
10611 Harwin Drive, Suite 402
Houston, Texas 77036

MAR 10 2006

Subject: Submission of a label amendment to update of label in accordance with 2000 TRED label revisions.

Product Name: RABON® 7.76 Oral Larvicide Premix
EPA Reg. No. 61483-48
Submission date: June 18, 2005

Dear Dr. O'Neal.

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.

General Comments:

Upon submission of the final printed labels, the Confidential Statements of Formula (CSF's) must be updated to reflect the current registrant and address information.

Labeling Comments:

1. Page 1
 - a. Place an "(" after the "(CAS# 22248-79-9" within the ingredient statement.
 - b. The ingredients percentages must be decimal aligned.
2. Page 2
 - a. Within the Conditions of Sale and Limitations of Warranty and Liability section, revise the sentence "In no event shall KMG-BERNUTH INC or seller to be liable for any incidental consequential or special damages resulting from the use or handling of this product." to: "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."
3. Page 3
 - a. Move the boxed section entitled "FOR CHEMICAL EMERGENCY" to the front panel of the label. (shown below)

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

- b. Revise the Personal Protective Equipment statement as follows:

PERSONAL PROTECTIVE EQUIPMENT (PPE)

“Some materials that are chemical-resistant to this product are” *(registrant inserts correct chemical-resistant material)*¹. “If you want more options, follow the instructions for category” *[registrant inserts A,B,C,D,E,F,G,or H]*¹ “on an EPA chemical-resistance category selection chart.”

“Loaders, mixers, applicators and other handlers must wear:

- long-sleeved shirt and long pants,
- shoes plus socks
- chemical resistant gloves
- protective eyewear”

- c. Revise the language within the USER SAFETY RECOMMENDATIONS section as follows:

“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. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.”

4. Page 4

- a. After the title “DIRECTIONS FOR USE”, move the statement “Read the entire label prior to use.” to a new line.
- b. Within the Use Restrictions add the following statement on a separate line. “Do not use this product on horses destined for slaughter.”


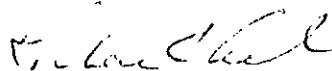
5. Page 6.

- a. The statements “This product is not to be used on horses destined for slaughter, can be removed. (See comment 4(b) above).
- b. Within the subsection entitled “As a Topdressing” correct the typographical error “RABOM” to “Rabon 7.76” or “this product”.

¹ The appropriate information must be inserted by KMG-Bernuth, Inc. for the correct final PPE language.

Two copies of the finished labeling must be submitted prior to releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



George LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

061483 00045 S78057e.DOC

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ACCEPTED
with COMMENTS
In EPA letter Dated:

March 10, 2006

Page 1 of 7
Rabon 7.76
6/18/05

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

RABON® 7.76 ORAL LARVICIDE PREMIX

61483-48

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

ACTIVE INGREDIENT:

Tetrachlorvinphos (CAS# 22248-79-9) 7.76%*

OTHER INGREDIENTS: 92.24%**

TOTAL: 100.00%

*RABON Insecticide – Contains 35 grams of RABON per pound.

**Refers only to ingredients which are not larvicidal.

EPA Reg.No. 61483-48

EPA Est. No. 4691-KS-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 1-800-424-9300 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. Probable mucosal damage may contraindicate the use of gastric lavage.

Mfd. For: KMG-Bernuth, Inc
Houston, Texas 77036 (713) 988-9252

Net Weight: 40 Pounds

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**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. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, 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.**

In no event shall **KMG-BERNUTH, INC** or Seller 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, NEGLIGENCE, 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.**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if 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.

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

PERSONAL PROTECTIVE EQUIPMENT

Mixers and handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear
- Chemical-resistant apron when cleaning equipment, mixing or loading

USER SAFETY REQUIREMENTS

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, 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 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 product is toxic to fish, birds, and other wildlife. 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 cleaning equipment or when disposing of equipment wash waters.

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DIRECTIONS FOR USE – Read the entire label prior to use.

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

USE RESTRICTIONS

For Horses: This product contains Tetrachlorvinphos, which is a cholinesterase inhibitor. The most frequently reported clinical signs of cholinesterase 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.

GENERAL INFORMATION

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.

In some cases, supplemental fly control measures may be needed in and around cattle 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 silage 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 feeds when standard mixing procedures are followed. Thus, usual problems that are common to all feed preparation and which cause stratification such as excessive free-fall or excessive handling, are to be avoided. It is recommended that appropriate pre-blending techniques be employed to assure adequate distribution throughout the feed mix. The premix should be pre-blended with ground grain, protein supplements, mineral mixes, etc. before being added to roughages such as chopped hay or silage. 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 mixer, horizontal blender, mixer/feed truck) may be used to prepare formulated feeds.

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not apply this product in a way that will contact workers or other persons, either directly or indirectly or through drift. Only protected handlers may be in the area during application. 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.

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APPLICATION INSTRUCTION

This product may be fed to cows, swine and mink up to slaughter and to lactating cows.

Cattle

In a Concentrate Feed – Roughage Fed Separately

This product can be used to prepare concentrate feeds that will provide 70 mg of RABON per 100 pounds of body weight daily.

To prepare a larvicidal concentrate feed, 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.

MIXING GUIDE			
Pounds of Concentrate Consumed per Animal per Day	RABON in the Concentrate mg/lb	%	Pounds of Rabon 7.76 Oral Larvicide Premix per Ton of Concentrate
0.5	1584	0.35	90.0
1.0	792	0.18	45.0
1.5	528	0.12	30.0
2.0	396	0.087	22.5
5.0	159	0.035	9.0
10.0	79	0.018	4.5
15.0	53	0.012	3.0
20.0	39	0.0087	2.3
25.0	32	0.0069	1.8
30.0	26	0.0059	1.5

Feed the appropriate larvicidal concentrate indicated to cattle weighing between 400 and 1200 pounds. For larger cattle weighing between 1200 and 1700 pounds, increase the amount of premix per ton of concentrate to 1½ times that indicated.

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 2.6 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 pounds of this product per ton of meal type feed and offer free choice. This is equivalent to 22.7 mg of RABON per pound of feed.

Sows, Boars and Breeding Gilts: Mix 2.6 pounds of this product per ton of meal type feed and offer 4 to 6 pounds of feed per animal per day. This is equivalent to 45.5 mg of RABON per pound of feed.

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**Horses (See special note under Use Restrictions)
 In a Concentrate Feed**

This product can be used to prepare concentrate feeds that will provide 70 mg of RABON per 100 pounds of body weight daily. All horses in the stable area should be treated. This product is not to be used on horses destined for slaughter.

To prepare a larvicide concentrate feed, 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.

MIXING GUIDE				
Pounds of Concentrate Consumed per Horse Per Day	Pounds of RABON 7.76 Oral Larvicide Premix Per Ton of Concentrate			
	250 lb Horse	500 lb Horse	1000 lb Horse	2000 lb Horse
2.5	4.0	8.0	16.0	32.0
5.0	2.0	4.0	8.0	16.0
10.0	1.0	2.0	4.0	8.0
15.0	0.7	1.4	2.7	5.4

As a Topdressing

Add this product daily to the grain or concentrate portion of the horse's diet to provide 70 mg of RABON per 100 pounds of body weight. This is equivalent to the following: 1/2 tablespoon for a 250 lb. animal; 1 level tablespoon for a 500 lb. animal; 2 level tablespoons (8.8 g) for a 1000 lb. animal or 4 tablespoons for a 2000 lb. animal.

All horses in the stable area should be treated. This product is not to be used on horses destined for slaughter.

Mink

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. This product can be mixed in mink feeds to prevent the development of house flies but should not be used as the sole method of control. It is recommended that appropriate pre-blending techniques be employed when mixing to assure an adequate distribution of RABON throughout the feed mix. Pre-blend 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.

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

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MXING GUIDE FOR MINK

Food Consumption (lbs.) Daily Per Animal	Amount of RABON 7.76 to Mix in Food		
	500 lb.	1000 lb.	2000 lb.
0.10	318 grams	1.4 lbs.	2.8 lbs.
0.25	114 grams	227 grams	1.0 lbs.
0.33	90 grams	180 grams	360 grams
0.50	59 grams	118 grams	236 grams
0.75	40 grams	80 grams	160 grams
1.00	35 grams	70 grams	140 grams

Start feeding Mink larvicidal feeds early in the spring before flies begin to appear and continue feeding throughout the summer until cold weather restricts fly activity. Supplemental adult 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.

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

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 or at an approved waste disposal facility. Open dumping is prohibited.

CONTAINER DISPOSAL: 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.