



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Friday, July 21, 2006

Mr. Thomas Mitchell
KMG-Bernuth, Inc.
A KMG Chemicals Company
10611 Harwin Drive, Suite 402,
Houston, Texas 77036-1534

Subject: Amended label per the Tolerance Reassessment Eligibility Decision.
Company/Product Number 61483-49
Date of Submission: July 9, 2003
Company/Product (Name): Rabon Oral Larvicide Manufacturing Base

Dear Mr. Mitchell;

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. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. The First Aid Statement must include the following section:

"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."

2. Revise the following section by inserting text identified in italics as follows:

*"Do not formulate or manufacture this product into feeds for use on horses intended for slaughter.
All end use products formulated for use on horses must contain the following language:*

USE RESTRICTIONS

For Use on Horses:

Do not feed this product to horses intended 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

has not been tested in breeding horses.”

The use restriction and new associated language provides the necessary requirements for any custom blended products that would otherwise not be identified with regards to this specific language.

3. Within the Directions for Use, the following statement: “Refer to “RABON Technical Bulletin” for formulating and other information.” requires the submission of the Rabon Technical Bulletin as part of the full label approval, or KMG-Bernuth, Inc. may remove this statement from the label.

If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505C)

Enclosure

Net Weight: 160 Pounds
72.6 Kilograms

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUL 21 2006
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
61483-49

Manufacturing Base

An Insecticide/Larvicide for Formulating Use Only

Active Ingredient:	By Weight
Tetrachlorvinphos (CAS No. 22248-79-9)	97.3%*
Other Ingredients:	2.7%
Total:	100.0%

*RABON Insecticide

Keep Out of Reach of Children

CAUTION

See side panel for additional precautionary statements.

TAKE TIME
OBSERVE LABEL
DIRECTIONS



KMG-Bernuth, Inc.
10611 Harwin Drive
Suite 402
Houston, Texas 77036
(713) 988-9252

EPA Reg. No. 61483-49
EPA Est. No. 3691-KS-01
ROL 1600302

Lot No.:

3/4

Precautionary Statements Hazards to Humans

CAUTION

Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequent contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical resistant gloves

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.

User safety recommendations

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

Users should remove clothing/PPE 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, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or the Regional Office of the EPA.

FIRST AID

If swallowed	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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

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 1-800-821-7467 for emergency medical treatment information.

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.

Directions for Use

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

Only for formulation into an insecticide/larvicide for the following: (1) uses as a feed additive in the feeds for cattle (beef & dairy, including lactating), swine, horses and mink to prevent the development of fecal flies; (2) uses for which EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) uses for experimental purposes that are in compliance with US EPA requirements. Refer to "RABON Technical Bulletin" for formulating and other information.

Formulators using this product are responsible for obtaining EPA registration of their formulated product. This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

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

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.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a dry place in original container.

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.

Pesticide Disposal: Pesticides that cannot be used or chemically reprocessed should be disposed of at an approved waste disposal facility.

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 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 of 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.