

61483-50

04/10/2006

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

APR 10 2006

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

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

Product Name: Ravap® E.C.

EPA Reg. No. 61483-50

Submission date: October 8, 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.

1. Page 1 of 8
 - a. Revise the boxed statement "RECOMMENDED FOR AGRICULTURAL/COMMERICAL NOT FOR SALE FOR ANY OTHER USES" to "DO NOT USE IN RESIDENTIAL AREAS"
 - b. Revise the word typographical error under the ingredient statement from "VAPON" to "VAPONA".
 - c. The preferred format of the First Aid Statements (in accordance with the following statement on Page 5 & 5 of PR Notice 2001-1)

"The first aid statements associated with the exposure route of greatest concern for the product being labeled should appear at the top of the box, followed by the statements pertaining to other potential routes of exposure." and the appropriate toxicology categories are as follows:

FIRST AID Organophosphate	
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.
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 swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice.

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

The "If Inhaled" statement may be removed from the First Aid Statement, since this toxicology category is IV. A complete copy of the Toxicology Review dated June 16, 1998 is enclosed.

2. Page 2 of 8
 - 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 of 8
 - a. Move the Cemtrek statement:

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

to the front panel of the label.

- b. Revise the **PERSONAL PROTECTIVE EQUIPMENT** section as follows:

PERSONAL PROTECTIVE EQUIPMENT

"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."

"Mixers loaders, applicators and other handlers must wear:

- long-sleeved shirt and long pants,
- shoes plus socks
- chemical resistant gloves for mixers and loaders supporting applications and all handlers supporting or using backpack or low pressure spray applications.
- protective eyewear

¹ Information regarding chemical resistant materials, and associated categories, may be located at the following Agency internet site: <http://www.epa.gov/pesticides/health/worker.htm>.

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- Chemical resistant apron when cleaning equipment, mixing or loading”
- Double layer clothing and gloves are required when handling back-rubber devices.

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a. Within the Directions for use, revise the following statements :

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. ~~For Agricultural/Commercial Use Only.~~ This product is suitable for use in conventional power or low pressure knapsack sprayers and in livestock back-rubbers. Follow the Use Directions for the proper dilution needed for specific insect control.”

as follows:

“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 suitable for use in conventional power or low pressure knapsack sprayers and in livestock back-rubbers. Follow the Use Directions for the proper dilution needed for specific insect control.”

Insert a new box entitled Non Agricultural Use Requirements as follows:

Non Agricultural Use Requirements

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

Revise the sub-header “Application Restrictions” to Use Restrictions” and insert the text as follows:

Use Restrictions

This product must be diluted with water except for back-rubber use.

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a. Delete the following use pattern from the table. This use was revoked for all EC products in the Tetrachlorvinphos TRED:

Roost Paint	Lice & Mites	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 pt. of dilution/100 ft. of roost area with brush or spray.
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a. Within the Remarks for use as a larvacide, revise the statements to read: “Apply 1 gal. of dilution/100 sq. ft. of droppings or manure as a coarse spray. Repeat at 7-10 day intervals for manure or until droppings begin to cone up, then treat only "hot spots* (small areas found to have large number of maggots). Do not

spray manure or droppings where runoff to soil or water can occur. Do not spray animals directly with this concentration.

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- b. Delete the USE RESTRICTIONS Section, and revise the verbiage within the "Remarks" section for **Kennel Use Directions** as follows:

"Apply 1 gal. of dilution per 500-1000 sq. ft. as a spot treatment only once per year. Thoroughly treat infested kennel, outside runways and along woody borders of kennels." Do not allow pets or people to return to treated areas until sprays have thoroughly dried. Thoroughly ventilate kennels to remove any vapors.

The Confidential Statement of Formula dated October 8, 2005 is acceptable, and has been placed in the file for the aforementioned product.

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 00051 570007 15 02

ACCEPTED
with COMMENTS
In EPA Letter Dated

APR 10 2006
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

61483-50

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Page 1 of 8
Ravap EC
10/08/05

Ravap® E.C.

RECOMMENDED FOR AGRICULTURAL/COMMERCIAL
USE ONLY. NOT FOR SALE FOR ANY OTHER USES.

Contains RABON® and VAPONA® Insecticides

ACTIVE INGREDIENT:	By Weight
Tetrachlorvinphos (CAS# 22248-79-9).....	23.0%* ✓
Dichlorvos (CAS# 62-73-7).....	5.3%** ✓
Related Compounds.....	0.4%
OTHER INGREDIENTS:.....	71.3%
TOTAL:.....	100.0%

*RABON Insecticide

**Equivalent to 5.7 wt % VAPON Insecticide

This product contains the toxic inert ingredient phenol

EPA Reg.No. 61483-50

EPA Est. No. 67517-MO-1

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

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.

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 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.

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 Contents: 1 U. S. Gallon
Store above 32° F. Combustible

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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. 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.**

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

DANGER

Corrosive. Causes irreversible eye damage or skin burns. Harmful if swallowed or absorbed through skin. Do not get in eyes (including animals), on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

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

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other 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:

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

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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PHYSICAL AND CHEMICAL HAZARDS

Combustible. Do not use, pour, spill or store near heat or open flame. Do not use with thermal foggers or heat-generating devices.

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. **For Agricultural/Commercial Use Only.** This product is suitable for use in conventional power or low pressure knapsack sprayers and in livestock backrubbers. Follow the **Use Directions** for the proper dilution needed for specific insect control.

Application Restrictions

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. Do not enter or allow others to enter the treated areas until sprays have dried. Must be diluted with water except for backrubber use.

California Only: When used in enclosed structures, do not enter or allow worker entry during the Restricted Entry Interval (REI) of 24 hours.

Livestock Use Directions: Do not make direct application to livestock more frequently than once per day.

Use	Insect	Dilution•Ravap In Water	Remarks
Livestock Spray (Beef Cattle)	Horn Flies, Lice, Including Tail Lice, and aids in control of Face Flies	1 gal. in 75 gal. or 5 oz. in 3 gal.	Dilute in water as indicated and spray directly on the animal only to the point of runoff. Use between ½ to 1 gallon of diluted spray solution per animal depending on size and hair coat. Do not treat more often than every 10 days. Do not apply to calves under six months of age. Brahman and Brahman-cross cattle should not be treated as they may show hypersensitivity to organophosphate pesticides. Do not apply in combination with other dermal organo-phosphate pesticides (e.g. trichlorofon). There is no withholding period from last application to slaughter.
	Horn Flies, Lone Star Ticks	1 gal. in 200 gal. or 2 oz. in 3 gal	Apply as above. For severe tick infestations, dilution may be increased to 1 gallon in 50 gallons water

Livestock Use Directions: Continued

Use	Insect	Dilution•Ravap In Water	Remarks
Livestock Spray (Lactating Dairy Cattle	Horn Flies, Lice, Lone Star Ticks, and aids in control of Face Flies	1 gal. in 200 gal or 2 oz. in 3 gal.	Dilute in water as indicated. Direct spray to cover thoroughly with up to ½ gallon of the dilution per animal. Repeat as necessary. Do not apply to calves under six months of age. No milk discard is required. Care should be taken that the spray does not come in direct contact with the lactating dairy cow's teats unless they are washed with an approved cleansing solution and dried before milking. Apply the spray at least 20 minutes prior to milking or after milking has been completed.

Backrubber Use Directions

Use	Insect	Dilution•Ravap In Oil	Remarks
Backrubber or Facerubber (Beef and Dairy Cattle	Horn Flies, and aids in control of Face Flies	1 gal. in 25 gal or 5 oz. in 1 gal	Mix with any approved backrubber base oil. Pour diluted solution into oil reservoir of mechanical rubbing devices or pour one gallon per 20 linear feet on burlap or rope backrubbers. Keep backrubber or facerubber charged.

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Poultry Use Directions

Use	Insect	Dilution•Ravap In Oil	Remarks
Caged Chickens	Lice & Mites	1 gal. in 50 gal or 5 oz. in 2 gal	Apply 1 gal. of dilution/100 birds under high pressure (no less than 100-125 psi) to the vent and fluff areas from below. Repeat when necessary; however, not more often than every 14 days. For individual bird treatment, apply 1 ounce of dilution per bird.
Chickens On Litter	Lice & Mites	1 gal. in 50 gal or 5 oz. in 2 gal	Apply 1-2 gal. of dilution/1000 sq. ft. evenly with penetration of litter surface. Also apply thoroughly to walls, roosts, cracks and crevices. Spray birds as above. Treat roosters carefully to avoid reinfestation of breeding flocks.
Roost Paint	Lice & Mites	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 pt. of dilution/100 ft. of roost area with brush or spray.
Poultry Buildings	Fowl Tick (Blue Bug)	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 gal. of dilution/100-150 sq. ft. to thoroughly cover walls, ceilings, floors, cracks and crevices using high pressure spray.

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Premise Use Directions for Poultry and Livestock Facilities

Use	Insect	Dilution-Rabon E.C. In Water	Remarks
Residual Surface Spray	Flies, Gnats, Litter Beetles, Mosquitoes, Spiders, Wasps	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 gal. of dilution/500-1000 sq. ft. Thoroughly cover walls, ceilings or other areas where pests rest or congregate in dairy barns, horse barns, poultry houses, swine buildings, livestock sheds and other farm buildings. Extreme infestations may necessitate increasing the diluted spray to one gallon per 12-1/2 gal. or 10 oz. per 1 gal. of water.
Larvicide	Maggots (fly larvae)	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 gal. of dilution/100 sq. ft. of droppings as a coarse spray. Repeat at 7-10 day intervals until droppings begin to cone up, then treat only "hot spots" (small areas found to have large number of maggots). Do not spray manure where runoff to soil or water can occur. Do not spray animals directly with this concentration.

USE RESTRICTIONS: For Outdoor Premise Products:

Restrict uses to only spot treatments. The product should be applied 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.

Kennel Use Directions

Use	Insect	Dilution-Ravap In Oil	Remarks
Residual Surface Spray – Kennels	Ticks, Fleas	1 gal. in 50 gal or 5 oz. in 2 gal	Apply 1 gal. of dilution/500-1000 sq. ft. Thoroughly treat infested kennel and outside runways.

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container only. Store at temperatures above 32°F. **Combustible. Do not use, pour, spill or store near open flame.** Do not store diluted product.

PESTICIDE DISPOSAL: Pesticide wastes are acutely toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your state pesticide or environmental control agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: **DO NOT** reuse empty container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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