

61483-50

1.7.2008

1/2



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JAN 7 2008

Hubert R. O'Neal, Ph.D.
Regulatory Consultant
KMG-Bermuth, Inc.
10611 Harwin Drive, Suite 402
Houston, Texas 77036

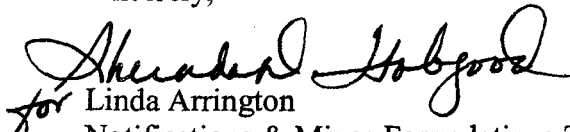
RE: Notification of proposed clarification changes
EPA Registration Number: 61483-50
Date of Submission: November 30, 2007

Dear Dr. O'Neal:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated, November 30, 2007 for the product Ravap E.C. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,


for Linda Arrington

Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

2/12

United States EPA Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/>	Registration	OPP Identifier Number
	<input type="checkbox"/>	Amendment	
	<input checked="" type="checkbox"/>	Other	

Application for Pesticide - Section 1

1. Company/Product Number 61483-50	2. EPA Product Manager George LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ravap E.C.	PM# 13	
5. Name and Address of Applicant (Include Zip Code) KMG-Bernuth, Inc. 10611 Harwin Drive, Ste 402 Houston, Texas 77036 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain Below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated March 10, 2008
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION
JAN - 7 2008

Explanation: Use additional page(s) if necessary. (For section I and section II.)
 General clarification changes to current approved EPA stamped label dated April 4, 2006.
SEE ATTACHED PAGE WITH SPECIFIC CLARIFICATION CHANGES
 This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR 98-10 and 40 CFR 152-46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (specify _____)
* Certification must be submitted		If "Yes" Unit Packaging Wt. _____ No. per container _____	If "Yes" Package Wt. _____ No. per container _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued	<input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dr. Hubert R. O'Neal	Title Regulatory Consultant	Telephone No. (Include Area Code) (713) 819-3932
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant	
4. Typed Name Dr. Hubert R. O'Neal	5. Date 30-Nov-07	

3/12

Ravap[®] E.C.

Livestock, Poultry & Premise Insecticide Spray

DO NOT USE IN RESIDENTIAL AREAS

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:	<u>71.3%</u>
TOTAL:	100.0%

*RABON Insecticide

**Equivalent to 5.7 wt % VAPONA Insecticide

This product contains the toxic inert ingredient phenol

EPA Reg.No. 61483-50

EPA Est. No. 67517-MC-1

KEEP OUT OF REACH OF CHILDREN

DANGER

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 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. • 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 atropine. Product may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage.	

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

Manufactured By: KMG-Bernuth, Inc
Houston, Texas 77036-1534 USA 800-322-8177
Combustible

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

NOTIFICATION

JAN - 7 2008

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 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, 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.

PERSONAL PROTECTIVE EQUIPMENT

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

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.

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

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.

Non Agricultural Use Requirements

Do not enter or allow others to enter the treated areas 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.

Use Restrictions

This product must be diluted with water except for back-rubber 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	Pest	Dilution-Ravap E.C. 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 and spray directly on the animal only to the point of runoff. Use between 1/2 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 organophosphate 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

7/2

Use	Pest	Dilution•Ravap E.C. 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. 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	Pest	Dilution•Ravap E.C. 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.

8/12

Poultry Use Directions

Use	Pest	Dilution-Ravap E.C. In Water	Remarks
Caged Chickens	Lice & Mites	1 gal. in 50 gal or 5 oz. in 2 gal	Apply 1 gal. of solution/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 solution per bird.
Chickens On Litter	Lice & Mites	1 gal. in 50 gal or 5 oz. in 2 gal	Apply 1-2 gal. of solution/1000 sq. ft. uniformly 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.
Poultry Buildings	Fowl Tick (Blue Bug)	1 gal. in 25 gal or 5 oz. in 1 gal	Apply 1 gal. of solution/100-150 sq. ft. to thoroughly cover walls, ceilings, floors, cracks and crevices using high pressure spray.

Poultry and Livestock Premise Sprays

Use	Pest	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 solution/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 solution/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.

Kennel Premise Sprays

Use	Pest	Dilution-Ravap E.C. In Water	Remarks
Residual Surface Spray – Kennels	Ticks, Fleas	1 gal. in 50 gal or 5 oz. in 2 gal	Apply 1 gal. of solution/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.

6/12

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.

EPA Notif 113007, Ravap,AR-150

RAVAP EC
EPA Reg. No. 61483 - 50
Notification Submission
EPA Form 8570-1 (Rev 3-94)
Dated November 30,2007

Supplemental Information Sheet

BACKGROUND: KMG-Bernuth, Inc. of Houston, TX (KMG), EPA Company Number 61483, is the registrant of record for Ravap E.C. and the current EPA stamped label is dated April 10, 2006. New commercial product labels are being printed and KMG desires to make some label clarification statements based on input from both customers and KMG regulatory and sales personnel.

PROPOSED CLARIFICATION CHANGES:

- All references to "Ravap" are changed to "Ravap E.C." in table headings.
- All references to "Insect" are change to "Pest" in table headings.
- The "Manufactured For" statement is changed to "Manufactured By" as KMG has recently acquired the manufacturing facilities.
- The KMG contact telephone number has been changed to show the company toll free number.
- The term "dilution" is changed to "solution" in the Remarks section the various tables. ✓
- The heading "Livestock Use Directions: Continued" is deleted as this will be a contiguous table when printed on the product label. ✓
- The term "as indicated" is deleted from the Remarks section in the Livestock Use Directions table. ✓
- The diluent "oil" is changed to "water" in the Dilution section of the Poultry Use Directions table. This is to be consistent with actual product usage.
- The term "evenly" is changed to "uniformly" to more specifically describe the application of the product when applied to chickens on litter.

12/12

Dr. Hubert R. O'Neal
Chemical and Regulatory Consultant
4109 Granada Drive
Georgetown, Texas 78628-1617
Tel: 512-863-3134
Fax: 512-868-9347
Cell: 713-819-3932

November 30, 2007

Document Processing Desk (NOTIF)
Office of Pesticides Programs (7504C)
U. S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Washington, D.C. 20460

Re: Ravap EC
EPA Registration No. 61483-50

Dear Sirs:

Enclosed are the following documents related to notification of changes to the label for the subject product:

EPA Form 8570-1 (Rev 3-94)
Supplemental Information Sheet explaining proposed notification changes
Copy of Word document (EPA Stamped label) with tracking of changes
Revised label – five copies

“This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.”

If you have any questions, please contact me.

Sincerely



Hubert R. O'Neal, PhD