

61483-50

1/14/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 14, 2011

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
Kavap® E.C., EPA Reg. No. 61483-50
Your Submission Dated August 20, 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 8:

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 8:

2. Revise the "Application Restrictions:" subsection heading to read "USE RESTRICTIONS:"

Storage and Disposal Statement section comment(s), page 8 of 8:

3. Revise the 1st sentence within the "PESTICIDE STORAGE:" subsection to read "Store product in its original container in a cool, dry place in an area that is inaccessible to children and animals."
4. Revise the last sentence within the "CONTAINER DISPOSAL:" subsection to read "Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, 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: Copy of label stamped "Accepted with Comments"
061483-00050 D441424

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ACCEPTED
With COMMENTS
In EPA Letter Dated:

January 14, 2011
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

Page 1 of 8
Ravap EC
EPA NOTIF 082010

61483-50

Ravap® E.C.

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

Contains RABON® and VAPONA® Insecticides

ACTIVE INGREDIENT:

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:	<u>100.0%</u>

*RABON Insecticide

**Equivalent to 5.7% W 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 1-800-322-8177 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. Probable mucosal damage may contraindicate the use of gastric lavage.

Mfd. For: KMG-Bernuth, Inc
9555 W. Sam Houston Pkwy. S., Ste 600
Houston, Texas 77099-2168 (800) 322-8177

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.

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**.

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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 and before eating, drinking, chewing gum, or using tobacco. 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.

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

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Premise Use Directions for Poultry and Livestock Facilities

Use	Insect	Dilution•Ravap In Oil	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.

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.

