

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

Revap® 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:

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: 061483-00050 D441424

Copy of label stamped "Accepted with Comments"

ACCEPTED
With COMMENTS
In EPA Letter Dated:

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

61483-50

Page 1 of 8 Ravap EC EPA NOTIF 082010

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) | |
| Related Compounds | |
| OTHER INGREDIENTS: | |
| TOTAL: | |
| *PARONIA (* *) | |

^{*}RABON Insecticide

This product contains the toxic inert ingredient phenol

EPA Reg.No. 61483-50

EPA Est. No. 67517-MO-1

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 2019

^{**}Equivalent to 5.7% W VAPON Insecticide

3049

Page 2 of 8. Ravap EC EPA NOTIF 082010

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, NEGILIGENCE, 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**.

Page 3 of 8 Ravap EC EPA NOTIF 082010

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 meanigh water mark. Do not contaminate water when cleaning equipment or when disposing of equipment wash waters.

Page 4 of 8 Ravap EC EPA NOTIF 082010

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.

| nequently | tnan once pe | i uay. | |
|--|--|--|---|
| 1 | | Dilution•Ravap | 1 |
| Use | Insect | 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 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 |

6069

Page 5 of 8 Ravap EC EPA NOTIF 082010

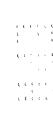
Livestock Use Directions: Continued

| | | Dilution•Ravap | |
|---|---|--|---|
| Use | Insect | 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. |





Poultry Use Directions

| , ouidy co | Directions | | |
|------------|------------|------------------|---------------------------------------|
| | | Dilution•Ravap | |
| Use | Insect | In Oil | Remarks |
| Caged | Lice & | 1 gal. in 50 gal | Apply 1 gal. of dilution/100 birds |
| Chickens | Mites | or | under high pressure (no less than |
| | | 5 oz. in 2 gal | 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 | Lice & | 1 gal. in 50 gal | Apply 1-2 gal. of dilution/1000 sq. |
| On Litter | Mites | or | ft. evenly with penetration of litter |
| | | 5 oz. in 2 gal | surface. Also apply thoroughly to |
| | | | walls, roosts, cracks and crevices. |
| | | | Spray birds as above. Treat |
| | | | roosters carefully to avoid |
| · | | | reinfestation of breeding flocks. |
| Roost | Lice & | 1 gal. in 25 gal | Apply 1 pt. of dilution/100 ft. of |
| Paint | Mites | or | roost area with brush or spray. |
| | | 5 oz. in 1 gal | |
| Poultry | Fowl Tick | 1 gal. in 25 gal | Apply 1 gal. of dilution/100-150 |
| Buildings | (Blue Bug) | or | sq. ft. to thoroughly cover walls, |
| | | 5 oz. in 1 gal | ceilings, floors, cracks and |
| | 1 | | crevices using high pressure |
| | | | spray. |





Premise Use Directions for Poultry and Livestock Facilities

| Premise Use Directions for Poultry and Livestock Facilities | | | |
|---|--------------|------------------|--------------------------------------|
| | | Dilution•Ravap | |
| Use | Insect | In Oil | Remarks |
| Residual | Flies, | 1 gal. in 25 gal | Apply 1 gal. of dilution/500-1000 |
| Surface | Gnats, | or | sq. ft. Thoroughly cover walls, |
| Spray | Litter | 5 oz. in 1 gal | ceilings or other areas where |
| | Beetles, | | pests rest or congregate in dairy |
| | Mosquitoes, | | barns, horse barns, poultry |
| | Spiders, | | houses, swine buildings, livestock |
| | Wasps | | 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 | 1 gal. in 25 gal | Apply 1 gal. of dilution/100 sq. ft. |
| | (fly larvae) | or | of droppings as a coarse spray. |
| | | 5 oz. in 1 gal | 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 | Ticks, Fleas | 1 gal. in 50 gal | Apply 1 gal. of dilution/500-1000°°° |
| Surface | | or | sq. ft. Thoroughly treat infested |
| Spray - | | 5 oz. in 2 gal | kennel and outside runways. |
| Kennels | | | |

9049

Page 8 of 8 Ravap EC EPA NOTIF 082010

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 Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available.

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

