



67517-33

5/2/2006

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OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 2, 2006

Mr. Joseph E. Dyer, Regulatory Agent
PM Resources, Inc.
13001 St. Charles Rock Road
Bridgeton, MO, 64044

SUBJECT: Submission of a label amendment in response to an Agency letter from Demson Fuller dated July 6, 2005.

EPA Reg. No. 67517-33

Product Name: Residual Livestock and Poultry Insecticide

Date of submission: July 7, 2005

Dear Mr. Dyer;

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. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Page 1 of 8:

- a. The CAS# needs to be changed to 22248-79-9. CAS 961-11-5 represents the unspecified form; Tetrachlorvinphos is the ISO 1750 name for CAS 22248-79-9.
- b. Place an "*" after the ingredient definition "Other Ingredients". Below the Ingredient statement insert the following: "*Contains petroleum distillates."¹

2. Page 2 of 8:

- a. Revise the Hazards to Humans and Domestic Animals Section as follows:

**"H A Z A R D S TO H U M A N S AND DOMESTIC ANIMALS
DANGER**

Fatal if inhaled. Do not breathe spray mist. Wear respiratory protection listed in the PPE section. Remove and wash contaminated clothing before reuse. **Corrosive. Causes irreversible eye damage.** Do not get in eyes or on clothing. Wear protective eyewear listed in the PPE section. Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco."

- b. Revise the Personal Protective Equipment (PPE) section as follows:

"Personal Protective Equipment (PPE):

"Personal Protective Equipment (PPE)

"Some materials that are chemical-resistant to this product are" (*registrant inserts correct chemical-resistant material*)². "If you want more options, follow the instructions for

¹ Note: This inclusion does not replace the other mandatory statement: "This product contains the toxic ingredient phenol."

² Registrant inserts the appropriate chemical resistant material and respective letter code.

category" [reg. *ant inserts A,B,C,D,E,F,G,or H*] "on at 'A 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 and all handlers supporting or using backpack or low pressure spray applications.
- A NIOSH respirator with an organic vapor (OV) cartridge, or a canister with any P,R, or HE pre-filter.

Workers handling backrubber devices must also wear.

- Double layer clothing and gloves."

3. Revise subsection title "General Precautions and Restrictions" to "USE RESTRICTIONS"

4. Page 3 of 8:

a. Within the First Aid Section"

Add the words "ORGANOPHOSPHATE INSECTICIDE" under the title "FIRST AID"

a. Revise the Note to Physician Treatment subsection language as follows:

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. Contains petroleum distillate - vomiting may cause aspiration pneumonia.

"Treatment: 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." Remove the statement "Atropine is antidotal only if symptoms of cholinesterase inhibition are present."

5. Page 8 of 8:

a. Replace the following 2 paragraphs:

Apply a coarse spray to infested areas of campgrounds, backyards, picnic areas, recreational parks, and other outdoor living areas. Do not spray trees, bushes, or ornamentals. Do not spray food crops. Do not enter area while spray is wet.

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.

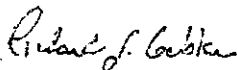
With this revised language:

"Apply as a course spot treatment spray along woody borders of kennels, yard, campgrounds, recreational parks, footpaths and roadways leading to such areas. Apply only as a spot treatment once per year. Do not spray trees, bushes, or ornamentals. Do not spray food crops. Do not reenter treated area or allow pets to enter area while surfaces are wet."

- b. Within the table listing Ticks, Fleas, Chiggers, remove the statement "Spray infested areas thoroughly (approximately 25 gallons of mixed solution per acre)." Application as a wide area treatment is not permitted. Revise the following sentence to "Apply as a spot spray along foot paths and roadsides leading to such areas."
- c. The "Dilution Table" can be deleted, since the IRED only permits spot treatment applications. Large amounts of diluted chemical would be unnecessary.

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

Sincerely,



for

George LaRocca
Product Manager 03
Insecticide Branch
Registration Division (7505C)

Enclosure
0575174.0033.DOC

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FRONT PANEL

RESTRICTED USE PESTICIDE
DUE TO HIGH ACUTE TOXICITY

For sale to and use by Certified Applicators or persons under their direct supervision and only for uses covered by the Certified Applicator's certification.

RESIDUAL LIVESTOCK AND POULTRY INSECTICIDE

Livestock Spray, Backrubber, Residual Surface Spray,
Larvicide Roost Paint, Poultry Spray,
Recreational Tick and Flea Spray

EMULSIFIABLE INSECTICIDE

- Controls Horn Flies, and Lone Star Ticks on Beef Cattle and Lactating Dairy Cattle
- Aids in control of Face Flies on Beef Cattle and Lactating Dairy Cattle
- Controls Lice on Swine
- No tissue or milk withdrawal required
- Controls Northern Fowl Mites, Chicken Mites Fowl Ticks and Lice on Chickens.

AGONY
with 0.00% Mites
In EPA Letter Dated:
May 2, 2006

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, this pesticide registered under EPA Reg. No. 67517-33

ACTIVE INGREDIENT:

Tetrachlorvinphos (CAS #961-11-5).....	24.00%
OTHER INGREDIENTS:.....	76.00%
	TOTAL 100.00%

This product contains the toxic inert ingredient phenol.

KEEP OUT OF THE REACH OF CHILDREN
DANGER/PELIGRO
POISON (In Red)
SKULL & CROSSBONES
SEE SIDE/BACK PANEL FOR
ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No.: 67517-33

EPA Est. No.: 67517-MO-1

NET CONTENTS: 1 Quart or 32 fl. oz. (946 ml)

Manufactured By
PM RESOURCES, INC
13001 St. Charles Rock Road
Bridgeton, MO 63044

PM Resources, Inc. Company Phone #: 314-291-6720

(Lot/Code/Product/Rev./Numbers as needed)

Mfg. & Printed in U.S.A.

Precautionary Labeling Must Meet Type Size and Prominence Requirements.

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SIDE/BACK PANEL

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

Fatal if inhaled. Corrosive. Causes irreversible eye damage. Harmful if swallowed. Harmful if inhaled. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing spray mist.

Personal Protective Equipment (PPE):

Handler must wear:

- * Long-sleeved shirt and long pants.
- * Socks and Shoes.
- * Goggles or face shield.
- * Chemical-resistant gloves (such as Barrier Laminate, Nitrile, Butyl, and/or Neoprene).
- * A NIOSH respirator with an organic vapor (OV) cartridge, or a canister with any P,R, or HE pre-filter.

User Safety Requirements:

Follow Manufacturer's instructions for maintaining/cleaning PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations:

User should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. User should remove clothing immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

General Precautions and Restrictions:

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

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish birds and wildlife. Drift and runoff may be hazardous to aquatic organisms in adjacent areas. Do not apply directly to water or areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

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SIDE/BACK PANEL

FIRST AID

- If Inhaled
 - Move person to fresh air.
 - If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
 - Call a poison control center or doctor for further 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 eye.
 - 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 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
 - 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.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor for treatment. You may also contact 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Contains a high percentage of light petroleum distillate, but probable mucosal damage may contraindicate the use of gastric lavage. If symptoms of cholinesterase inhibition are present, atropine by injection is antidotal. Tetrachlorvinphos is an organophosphate insecticide. 2-PAM is also antidotal and may be used in conjunction with atropine.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not store near heat or open flame. Store in original containers in a safe place. Store above 32°F and Do not store above 120°F for an extended period of time. Keep containers sealed when not in use.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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: Plastic Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture, and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

NOTICE OF WARRANTY

PM RESOURCES, INC. MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED CONCERNING THIS PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL CONDITIONS IN ACCORD WITH THE STATEMENTS MADE ON THIS LABEL.

OR

Buyer assumes all responsibility for safety and use not in accordance with directions.

The use of any notice of warranty statement is optional.

DIRECTIONS FOR USE

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

Residual Livestock and Poultry Insecticide is suitable for use in conventional power or low pressure knapsack sprayers and mechanical or pour-on rubbing devices. Follow the DIRECTIONS FOR USE for the proper percent solutions needed for a specific insect problem and use. Refer to the DILUTION TABLE for quantity of insecticide needed at the percent solution recommended. There is no withholding period from last application to slaughter.

DIRECTIONS FOR BEEF AND LACTATING DAIRY CATTLE AND SWINE USE

ANIMAL	INSECT	USE	% SOLUTION	REMARKS
Beef	Horn Flies, Face Flies, Lice including Tail Lice	Livestock Spray	0.30%	Apply as coarse spray. Use between ½ to 1 gallon of spray per animal, depending on size and hair-coat
	Lone Star ticks		0.5%	
Lactating Dairy Cattle	Horn Flies, Face Flies, Lice including Tail Lice	Livestock Spray	0.04%	Apply as coarse spray. Use ½ gallon of spray per animal.
Beef and Lactating Dairy Cattle	Horn Flies, Face Flies	Backrubber	1.0%	Mix with #2 diesel oil or any approved backrubber base oil. Keep backrubber charged.
Swine	Lice	Livestock Spray	0.5%	Apply as coarse spray using 1 to 2 quarts per head to thoroughly wet the animal. Repeat in 2 weeks if required.

DILUTION TABLE

AMOUNT OF RESIDUAL LIVESTOCK & POULTRY INSECTICIDE	AMOUNT OF WATER			Amount of Oil (1.0% Solutions)
	(0.04% solution)	(0.30% Solution)	(0.5% Solution)	
Pint	74.5 gallons	10 gallons	6 gallons	3 gallons
Quart	149.0 gallons	18 gallons	12-½ gallons	6 gallons
Gallon	298.0 gallons	75 gallons	30 gallons	25 gallons

NOTE: Agitate mixture thoroughly before application.

DIRECTIONS FOR USE (Cont'd)

DIRECTIONS FOR POULTRY USE

TO CONTROL	TYPE HOUSING	STRENGTH TO USE	APPLICATION	REMARKS
Lice and Mites	Wire Cage	0.5%	1 gallon / 100 birds	Apply directly to birds, spray vent and fluff areas from below. Repeat when necessary. Do not repeat more often than every 14 days. For individual bird treatment, apply 1 ounce of the mixture per bird
<p>Note: For maximum lasting control of the northern fowl mite, penetration of the feathers around the vent area is absolutely essential. Use power sprayer at 100-125 PSI at NOT LESS THAN RECOMMENDED RATE. More attention must be given each individual bird when using low-pressure equipment. Treat roosters carefully and thoroughly to avoid re-infestation in breeding flocks.</p>				
	Floor Management	0.5%	1-2 gallon / 1000 sq. ft.	Apply evenly for penetration to litter surface. Apply thoroughly to walls, roosts, cracks, crevices and interiors. Spray birds lightly.
	Roost Pint	1.0%	1 pint / 100 ft	Treat with brush or spray thoroughly, particularly cracks and crevices. Wear protective gloves.
Fowl Tick (Blue Bug)	All Types	1.0%	1 gallon / 100-150 sq. ft.	Apply thoroughly to walls, ceiling, floors cracks and crevices with a power sprayer.
Flies Residual	All Types	1.0%	1 gallon/500-1,000 sq. ft.	Apply thoroughly to point of runoff to walls, ceilings, and where flies congregate and feed. Do not apply to the birds.
Larvicide	Wire Cages	1.0%	1 gallon/100 sq. ft. of droppings	A thorough coverage and penetration is essential for initial control.
<p>NOTE: Regardless of the condition of the droppings, apply enough spray to penetrate and kill the larvae. Less spray will be required thereafter provided a regular schedule is followed.</p>				

DIRECTIONS FOR USE (Cont'd)

DILUTION TABLE

CONCENTRATION	AMOUNT OF WATER			
	1 GALLON	5 GALLONS	25 GALLONS	100 GALLONS
Amount of RESIDUAL LIVESTOCK AND POULTRY INSECTICIDE 0.50% Concentration	3 ounces	13 ounces	2 quarts	2 gallons
Amount of RESIDUAL LIVESTOCK AND POULTRY INSECTICIDE 1.00% Concentration	6 ounces	26 ounces	4 quarts	4 gallons

NOTE: Agitate mixture thoroughly before application.

DIRECTIONS FOR RESIDUAL SURFACE AND LARVICIDE

Residual Surface Spray:

Mix 1 gallon of RESIDUAL LIVESTOCK AND POULTRY INSECTICIDE in 25 gallons of water (1% concentration) and apply as an over-all application to ceiling and walls of dairy barns, livestock sheds, calf barns, hog barns and other farm buildings. Other areas where flies congregate, such as around garbage dumps and corral should be sprayed thoroughly. Repeat applications as fly populations warrant. Extreme infestations may necessitate increasing the dosage to 2 gallons RESIDUAL LIVESTOCK AND POULTRY INSECTICIDE per 25 gallons of water. Applications should be made to the point of run-off. One gallon of spray should treat 500 to 1,000 sq. ft. of surface area.

Larvicide:

Mix 1 gallon of RESIDUAL LIVESTOCK AND POULTRY INSECTICIDE with 25 gallons of water (1% concentration) and apply 1 gallon of solution for every 100 square feet of droppings under poultry on wire or in cages, or apply around manure, or garbage.

DILUTION TABLE

CONCENTRATION	AMOUNT OF WATER		
	1 GALLON	5 GALLON	25 GALLON
Amount of RESIDUAL LIVESTOCK AND POULTRY INSECTICIDE for Residual Fly Control at 1.0%	6 ounces	26 ounces	1 gallon
Amount of RESIDUAL LIVESTOCK AND POULTRY INSECTICIDE for Larvicide Cleanup at 1.0%	6 ounces	26 ounces	1 gallon

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SIDE/BACK PANEL

DIRECTIONS FOR USE (Cont'd)

DIRECTIONS FOR RECREATIONAL AREA TICK & FLEA SPRAY

Apply a coarse spray to infested areas of campgrounds, backyards, picnic areas, recreational parks, and other outdoor living areas. Do not spray trees, bushes, or ornamentals. Do not spray food crops. Do not enter area while spray is wet.

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.

INSECT	USE	% SOLUTION	REMARKS
Ticks Fleas Chiggers	Spray	0.5%	Spray infested areas thoroughly (approximately 25 gallons of mixed solution per acre). Spray along foot paths and roadsides leading to such areas.

DILUTION TABLE

AMOUNT OF RESIDUAL LIVESTOCK AND POULTRY INSECTICIDE	AMOUNT OF WATER (0.5% SOLUTION)
1 pint	6.25 gallons
1 quart	12.5 gallons
2 quarts	25 gallons
1 gallon	50 gallons