

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

December 11, 2014

Ms. Michelle Foster Associate Manager, Regulatory Affairs Virbac Animal Health, Inc. 3200 Meacham Boulevard Fort Worth, TX 76137-4611

Subject: Label Amendment – Incorporation of Revised Precautionary Language in

Response to Agency Letter Dated May 2, 2006

Product Name: Residual Livestock and Poultry Insecticide

EPA Registration Number: 67517-33 Application Date: October 2, 2014

Decision Number: 497489

Dear Ms. Foster:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2 EPA Reg. No. 67517-33 Decision No. 497489

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Mr. Carmen J. Rodia, Jr. by phone at (703) 306-0327 or via e-mail at *Rodia.Carmen@epa.gov*.

Sincerely,

Richard Gebken Product Manager 10

Invertebrate & Vertebrate Branch 2

Office of Pesticide Programs

Enclosure

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
- $^{\circ}$ Controls Lice on Swine
- ° No tissue or milk withdrawal required
- ° Controls Northern Fowl Mites, Chicken Mites Fowl Ticks and Lice on Chickens.

ACCEPTED 12/11/2014

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

67517-33

ACTIVE INGREDIENT

100.00% TOTAL

This product contains the toxic inert ingredient phenol. *Contains petroleum distillates.

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

EPA Est. No.: 67517-MO-1 EPA Reg. No.: 67517-33

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

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

(Lot/Code/Product/Rev./Numbers as needed) Precautionary Labeling Must Meet Type Size and Prominence Requirements.

PAGE 1 OF 7 October 2, 2014

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS 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.

Personal Protective Equipment (PPE):

Some materials that are chemical-resistant to this product are barrier laminate, nitrile rubber, butyl rubber, and neoprene rubber. If you want more options, follow the instructions for category C 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 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.

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.

USE 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.

PAGE 2 OF 7 October 2, 2014

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.

FIRST AID ORGANOPHOSPHATE INSECTICIDE

ORGANOPHOSPHATE INSECTICIDE ______ ° Move person to fresh air. If Inhaled ° 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. -------° Hold eye open and rinse slowly and gently with water for 15-20 If in Eyes $^{\circ}$ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. $^{\circ}$ Call a poison control center or doctor for treatment advice. If Swallowed ° Call a poison control center or doctor immediately for treatment advice. $^{\circ}$ 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. $^{\circ}$ Do not give anything by mouth to an unconscious person.

If on Skin

- ° Take off contaminated clothing.
- or Clothing $\,^{\circ}$ 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

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.

PAGE 3 OF 7 October 2, 2014

NOTE TO PHYSICIAN

Tetrachlorvinphos is an organophosphate insecticide.

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.

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.

PAGE 4 OF 7 October 2, 2014

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

DILUTION TABLE

AMOUNT OF RESIDUAL		AMOUNT OF OIL		
LIVESTOCK & POULTRY	(0.04%	(0.30%	(0.5%	(1.0% SOLUTIONS)
INSECTICIDE	solution)	Solution)	Solution)	
Pint	74.5 gallons	10 gallons	6 gallons	3 gallons
Quart	149.0 gallons	18 gallons	12-½ gallons	6 gallons
Gallon	595.0 gallons	75 gallons	50 gallons	25 gallons

NOTE: Agitate mixture thoroughly before application.

DIRECTIONS FOR USE (Cont'd)

DIRECTIONS FOR POULTRY USE

TO CONTROL	TYPE	STRENGTH	APPLICATION	REMARKS
	HOUSING	TO USE		
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.
	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-pressured equipment. Treat roosters carefully and thoroughly to avoid re-infestation in breeding flocks.			the vent area is absolutely 0-125 PSI at NOT LESS THAN ast be given each individual bird Treat roosters carefully and
	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 / 500-1000 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.

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.

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.

PAGE 6 OF 7 October 2, 2014

DIRECTIONS FOR USE (Cont'd)

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 corrals 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.

<u>Larvicide:</u> 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 GALLONS	25 GALLONS
Amount of RESIDUAL LIVESTOCK AND POULTRY	6 ounces	26 ounces	1 gallon
INSECTICIDE for Residual Fly Control at 1.0%			
Amount of RESIDUAL LIVESTOCK AND POULTRY	6 ounces	26 ounces	1 gallon
INSECTICIDE for Larvicide Cleanup at 1.0%			

DIRECTIONS FOR RECREATIONAL AREA TICK & FLEA SPRAY

Apply as a coarse spot treatment spray along woody borders of kennels, yards, 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.

INSECT	USE	% SOLUTION	REMARKS
Ticks	Spray	0.5%	Apply as a spot spray along foot paths and roadsides
Fleas			leading to such areas.
Chiggers			