

67517-82

05/01/2006

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 1, 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 of an Agency letter from Demson Fuller dated July 6, 2005.
EPA Reg. No. 67517-82
Product Name: Rabon Dust for Dogs and Cats
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.

1. Page 1 of 3

- a. **Contains 3% *Rabon_ Insecticide
For Use on Dogs and Cats**

Place the * after the word Rabon, and remove the “_” symbol afterwards.

- b. *** Rabon Insecticide A Registered Trademark of Shell Oil Company**

The trademark is currently owned by KMG-Bernuth, Inc. and should be revised accordingly.

2. Page 2 of 3

- a. **Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.**

Similar language exists in the Hazards to Animals section, therefore, revise this statement to: “Do not use this product in conjunction with other organophosphate insecticides.”

- b. Rabon is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine.

Revise the Note to Physician statement to: "This product contains an organophosphate that inhibits cholinesterase. 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."

3. Page 3 of 3

- a. The current reapplication interval for the directions for use, do not match those for the control statements on Page 1. Revise these as follows: "To control fleas, reapply every 16 days. To control brown dog ticks, reapply every 7 days."

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

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

Sincerely,




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

Enclosure

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**AGREEMENT
with COMMENTS
In EPA Letter Dated:**

May 1, 2006

FRONT PANEL

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
67517-82

RABON DUST FOR DOGS AND CATS

Contains 3% *Rabon Insecticide
For Use on Dogs and Cats

- A Ready To Use Insecticide Dust
- Controls Both Fleas And Ticks
- Kills Fleas Up To 16 Days
- Kills Brown Dog Ticks Up To 7 Days
- Controls Fleas and Ticks In Pests Sleeping Quarters

ACTIVE INGREDIENT:

Tetrachlorvinphos (CAS #961-11-5).....	3.00%
OTHER INGREDIENTS:	<u>97.00%</u>
	TOTAL 100.00%

* Rabon Insecticide A Registered Trademark of Shell Oil Company

**KEEP OUT OF THE REACH OF CHILDREN
CAUTION
SEE SIDE/BACK PANEL FOR
ADDITIONAL PRECAUTIONARY STATEMENTS**

EPA Reg. No.: 67517-82
NET WT.: 4 OZ.

EPA Est. No.: 67517-MD-1

Manufactured By
FM RESOURCES, INC
13001 St. Charles Rock Road
Bridgeton, MD 63044

IN CASE OF EMERGENCY CALL: NATIONAL PESTICIDE TELECOMMUNICATIONS AT 1-800-858-7378

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

Mfg. & Printed in U.S.A.

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SIDE/BACK PANEL

READ ENTIRE LABEL BEFORE EACH USE

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

HAZARDS TO HUMANS: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing, using tobacco or using the toilet. This product may cause skin sensitization reactions in certain individuals. Remove contaminated clothing and wash before reuse. Avoid contamination of feed and foodstuffs.

HAZARDS TO ANIMALS: Do not use on puppies under 12 weeks of age. Do not reapply product for 5 days. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing animals.

Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian before using on medicated animals.

Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.

FIRST AID

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- 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.
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- 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.
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- 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.
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HOT LINE NUMBER

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

NOTE TO PHYSICIAN

Rabon is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine.

SIDE/BACK PANEL

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL BEFORE EACH USE

FOR USE ON DOGS AND CATS: To control fleas and ticks on your pet, dust powder liberally over the animal and rub thoroughly through hair coat to skin. Apply also to feet, between the toes and on the legs for tick control. Use 1/3 oz. of powder per every 10 pounds of body weight of your cat or dog. Reapply as needed but not more often than once every 5 days.

Occasional dusting of pet's bedding and around pet's sleeping quarters and other areas will help free area of fleas and ticks. Repeat at weekly intervals if necessary.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store in original container in area inaccessible to children and pets away from heat and sunlight. Avoid exposure to moisture.

CONTAINER DISPOSAL: If **Empty:** Do not reuse this container. Place in trash or offer for recycling if available. If **Partly filled:** Call your local solid waste agency 1-800-CLEANUP for disposal instructions. Never place any unused product down any indoor or outdoor drain.

NOTICE OF WARRANTY

FM 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.

NOTE: The use of any notice of warranty statement is optional.