

United States Environmental Protection Agency

Mr. Chuck Koopman, Agent for Sweetlix, LLC
Stewart Agricultural Research Services, Inc.
P.O. Box 509
Macon, MI 63552

DEC 28 2004

Subject: Submission of an application to amend the label for *V.M.S. Rabon 7.76 Oral Larvicide Premix* under the Federal Insecticide Fungicide, and Rodenticide Act.
Product Name: **V.M.S. RABON 7.76 ORAL LARVICIDE PREMIX**
EPA Reg. No.: 73600-4
OPP Identifier No.: none

Dear Mr. Koopman,

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.

Within the **Directions for Use** directly below the **Use Restrictions** section add a new section as follows:

“Precautions For Horse Use: This product contains tetrachlorvinphos, which is a cholinesterase inhibitor. The most frequently reported clinical signs of cholinesterase inhibition in the horse are abdominal pain, lethargy, sweating, tearing and excessive salivation. If these signs are seen in horses, consult your veterinarian immediately. Do not use this product simultaneously or within a week before or after treatment with cholinesterase inhibiting drugs, pesticides or chemicals. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals. This product has not been tested in breeding horses.”

Within the Directions for Use, correct the typo error from : “without withholding the milk form market....” to without withholding the milk **from** market.....”

This language was identified with the TRED published on the Agency internet site:
http://www.epa.gov/oppsrrd1/REDS/tcvp_tred.pdf

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶								
DATE ▶	Dec 28, 2004							

276

United States Environmental Protection Agency

A stamped draft copy is enclosed for your records. Five copies of the finished labeling must be submitted prior to releasing the product for shipment. If you have any questions please contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



George LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

enclosure
073600-00004 8772260 wjd

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶								
DATE ▶	Dec 28, 2004							

VMS Rabon® 7.76 Oral Larvicide Premix

For control of fecal flies in manure of treated cattle and horses. Prevents development of face flies, horn flies, house flies and stable flies in the manure of treated cattle. A premix for further manufacture of feed

KEEP OUT OF REACH OF CHILDREN

CAUTION

(See next panel for First Aid and Precautionary Statements)

ACTIVE INGREDIENT:

Tetrachlorvinphos: (Z)-2-Chloro-1-(2,4,5-trichlorophenyl) vinyl demethyl phosphate*	7.76%
Other ingredients**	92.24%

*Each lb. contains 35.2 g Rabon®

**Refers only to ingredients which are not larvicidal

Guaranteed Analysis

Will vary according to species requirements, geographic area and regional feeding requirements.

FEED INGREDIENTS**

Molasses products, roughage products, grain products, plant protein products, processed grain by-products, mineral products, vitamins, food additives permitted in animal feed/drinking water, GRAS ingredients, fats/oils, animal products, animal protein products***, miscellaneous products***, chemical preservatives, amino acids & related products, fermentation products, distillers products, enzymes, brewers products, marine products, special purpose products

** AAFCO approved feed ingredients may vary depending upon nutritional requirements in different species and geographic regions of the country.

***Contains no prohibited animal-by-products in accordance with FDA regulation 21 CFR 589.2000.

EPA No: 73600- 4
EPA Est. No: 73600-XX-01

Net weight: 50 lbs.

ACCEPTED
with COMMENTS
in EPA Letter Dated
DEC 28 2004

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

73600-4

FIRST AID	
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 by a poison control center or doctor.
IF ON SKIN:	-Take off contaminated clothing. -Rinse skin with plenty of water for 15-20 minutes. -Call poison control center or doctor for treatment advice.
IF IN EYES:	-Hold eyes 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 physician for treatment advice.
HOT LINE NUMBER	
In case of emergency, contact Sweetlix LLC (800) 325-1486.	
NOTE TO PHYSICIANS AND VETERINARIANS	
Symptomology: Signs of organophosphate toxicity are those of cholinergic over stimulation; hypersalivation, excessive urination, diarrhea and dyspnea (respiratory distress, collapse and death from respiratory muscle paralysis).	
Treatment: Withdraw product immediately. Clinical includes 3 categories; musarinic blocking agents (atropine sulfate), (2) cholinesterase reactivators (atropine and 2-PAM, pralidoxine chloride) and (3) emetics (i.e. syrup of ipecac), cathartics (i.e. vegetable oil) and absorbents (i.e. charcoal slurry).	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction to some individuals.

USER SAFETY RECOMMENDATIONS

Personal Protective Equipment (PPE): long-sleeved shirt and long pants, shoes and socks, chemical resistant gloves. Users should 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. 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.

ENVIRONMENTAL HAZARDS

This compound is toxic to fish.

DIRECTIONS FOR USE

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

USE RESTRICTIONS: Not to be used on horses destined for slaughter.

GENERAL INSTRUCTIONS

Optimum performance can be assured only if VMS Rabon 7.76 Oral Larvicide Premix is dispersed uniformly with the feedstuff at recommended levels. Common feed mixing equipment (i.e., vertical mixers, horizontal blenders, mixer feeder truck) may be used to prepare formulated feeds.

VMS Rabon 7.76 Oral Larvicide Premix should not be mixed in liquid supplements. 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.

IN A COMPLETE RATION – NO OTHER ROUGHAGE FED

VMS Rabon 7.76 Oral Larvicide Premix can be used to prepare rations that contain 26.4 mg of Rabon per pound of complete ration. To prepare a larvicidal ration, mix 1.5 pounds of VMS Rabon 7.76 Oral Larvicide Premix per ton of complete mixed ration containing both grain and roughages.

Full feed this larvicidal complete ration to feeder cattle weighing from 400 to 1400 pounds or to dairy cattle at a rate sustaining milk production, but not less than 2.6 pounds of the ration per 100 pounds of body weight daily.

IN A CONCENTRATE FEED – ROUGHAGES FED SEPARATELY

VMS Rabon 7.76 Oral Larvicide Premix can be used to prepare concentrate feeds that will provide 792 mg of Rabon per animal per day. To prepare a larvicidal concentrate feed, mix VMS 7.76 Oral Larvicide Premix according to the amount of concentrate to be fed per animal per day. Use the following table as a guide for proper rate.

Lbs of Concentrate consumed per head per day	Lbs VMS Rabon 7.76 Oral Larvicide Premix per ton	Rabon In the concentrate	
		(mg/lb)	(%)
0.5	90.0	1584	0.35
1.0	45.0	792	0.18
1.5	30.0	528	0.12
2.0	22.5	396	0.087
5.0	9.0	159	0.035
10.0	4.5	79	0.018
15.5	3.0	53	0.012
20.0	2.3	39	0.0087
25.0	1.8	32	0.0069
30.0	1.5	26	0.0059

Feed the appropriate larvicidal concentrate to cattle weighting between 400 and 1200 pounds. For larger cattle weighing 1200-1700 pounds, increase the amount of concentrate to 1- ½ times that recommended. Start feeding Rabon larvicidal feeds early in the Spring before flies begin to appear and continue feeding throughout the Summer and into the Fall until cold weather restricts fly activity. Rations containing VMS Rabon 7.76 Oral Larvicide Premix may be fed up to slaughter and to lactating dairy cows without withholding the milk from market during or after treatment.

Rabon prevents the development of horn flies, face flies, house flies and stable flies in the manure of treated cattle but is not effective against existing adult flies. In some cases, supplemental fly control measures may be needed in and around cattle lots and barns to control adult house flies and stable flies which can breed not only in cattle manure but also in other decaying vegetable matter or silage on the premises. In order to achieve optimum fly control, VMS Rabon 7.76 Oral Larvicide Premix should be used in conjunction with other good management and sanitation practices.

STORAGE AND DISPOSAL

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

Disposal: completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by State and Local Authorities, by burning. If burned, stay out of the smoke. Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

For additional information, please contact your Sweetlix representative.

Rabon® is a registered trademark of KMG Chemicals, Houston, TX.

Manufactured by
Sweetlix LLC
Salt Lake City, UT 84111

Contact us at 1-87SWEETLIX
www.sweetlix.com