

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 18, 2003

Registrations By Design/Bonide Products, Inc.
118½ E. Main Street, Suite 1
Salem, VA 24153

Attention: Rebecca M. Horton

Subject Boide Liquide Rotenone /Pyrethrins Spray
EPA Reg. No. 4-315
Your application for a new basic CSF and label dated October 23, 2002, and your submission of the acute toxicity data dated November 12, 2002.

CSF Review The Agency has reviewed your Confidential Statement of Formula (CSF) dated October 21, 2002, and found it acceptable with the following exceptions:

The CSF contains a source of Rotenone that does not have a valid EPA Registration Number. Please submit a corrected CSF.

Acute Toxicity Review The five acute toxicity studies submitted have been reviewed and they are classified as acceptable. The acute inhalation study still needs to be submitted for review. Please submit this data within the next 180 days or cite data to support this registration.

- Label Review**
1. The signal word for now, without the inhalation study, should be "CAUTION".
 2. Directly under the ingredient statement, include: "Contains Petroleum Solvents".
 3. Remove the word "Safe" from the Optional Marketing Statements.
 4. Please remove Fire Ants from the Optional Marketing Statement and the corresponding directions for use. Fire ants are public health pests which must be supported with efficacy data.

305-5625668
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306-624018
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5. Please change the **PRECAUTIONARY STATEMENTS** to say:
Hazards to Humans and Domestic Animals
CAUTION: Harmful if swallowed or inhaled. Causes moderate eye irritation. Avoid contact with eyes, clothing or breathing (spray mist). Remove contaminated clothing and wash clothing before reuse.

6. Add an **"If Inhaled"** statement to the **FIRST AID** section:

If inhaled Move the person to fresh air. If the 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 treatment advice.

Label Review (Cont.)

6. Change the statements for **"IF SWALLOWED"** to the following:

- Immediately call a poison control center or doctor.
- Do not induce vomiting unless told to by a poison control center or doctor
- Do not give any liquid to the person.
- Do not give anything by mouth to an unconscious person.

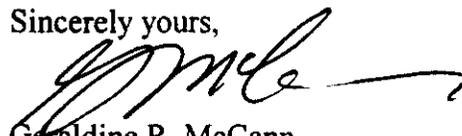
7. Please add the following **"Note to Physician"** to the First Aid statements:

May pose an aspiration pneumonia hazard. Contains petroleum distillate. Have the container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-XXX-XXXX for emergency medical treatment information (please include a 24-hour emergency service number - see the enclosed brochure).

EI Contact

If you have questions about this letter, please contact me at 703-605-0716 (by phone), 703-305-6596 (by fax), or mccann.geri@epa.gov (by E-Mail).

Sincerely yours,



Geraldine R. McCann
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure Stamped Label, Toxicology Review, NPIC information brochure.

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MASTER LABEL



LIQUID ROTENONE/PYRETHRINS SPRAY

Optional Marketing Statements

- A combination of insecticides for easy mixing with water.
- Safe for use on the listed fruits, vegetables and ornamental plants.
- Controls insect pests, such as aphids, leaf-hoppers, Japanese beetles, stink bugs, flea beetles...**USE** on apples, plums, peas, squash, cabbage, oak, elm, cedar, petunia, aster, geranium, marigold...**MIX** 1 to 4 tsp. per gallon of water. **Mixture ratios vary. Read and use according to label directions...APPLY** using a sprayer or watering can.
- Concentrate
- Makes up to 48 gallons (8 fl. oz. container) [96 gallons (pint)]
- Also kills fire ants

ACTIVE INGREDIENTS:

Rotenone (CAS No. 83-79-4)	1.1% w/w
Other Cube Extracts	1.1%
Pyrethrins (CAS No.8003-34-7)	0.8%
OTHER INGREDIENTS:	97.0%
TOTAL:	100.0%

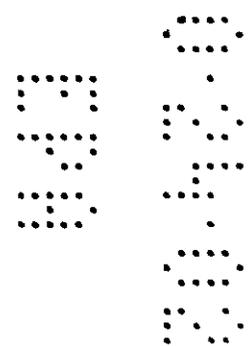
KEEP OUT OF REACH OF CHILDREN

WARNING

See back/side/other panel(s) for First Aid and additional Precautionary Statements...:

NET CONTENTS _____

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUL 18 2003
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
4-315



FIRST AID	
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.	
If swallowed	Call 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.
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 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: May be fatal if swallowed. Harmful if absorbed through skin. Causes skin irritation. May cause substantial but temporary eye injury. Wear safety glasses. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Environmental Hazards

This pesticide is extremely toxic to fish. Do not apply directly to water. Runoff and drift from treated areas may be hazardous to aquatic organisms in adjacent sites. Do not contaminate water when disposing of equipment washwaters.

Physical and Chemical Hazards

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

STORAGE & DISPOSAL

STORAGE: Store and transport in an upright position. Store in a cool, dry area inaccessible to children or pets.

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

Mix this product with water as directed in the following chart to control the listed pests of ornamentals, vegetables, fruits and berries. Use a hand or automatic sprayer as a coarse spray. Use sufficient spray mix to give complete coverage of the plant.

SITE	PESTS	VOLUME OF PRODUCT/GALLON OF WATER	COMMENTS
Fruits & Berries Apple, Pear, Peach, Plum, Cherry, Grape, Currant, Gooseberry, Raspberry, Blackberry, Strawberry, Blueberry	Aphids, Leafhoppers, Exposed Thrips	1 teaspoon	Do not apply within one day of collection. Repeat every 5-10 days or as needed.
	Imported Currant Worms, Gooseberry Fruit Worms, Raspberry Fruit Worms, Blueberry Maggots, Cherry Fruit Flies, Strawberry Root Worms (adult), Red-necked Borers, Japanese Beetles, Mites	2 teaspoons	
	Strawberry Leafrollers, Rose Chafer	4 teaspoons	
Vegetables Peas, Bean, Beet, Cucumber, Squash, Muskmelon, Potato, Tomato, Cabbage, Spinach, Lettuce, Celery, Asparagus, Pepper, Eggplant, Onion, Carrot, Corn	Aphids, Leafhoppers, Exposed Thrips	1 teaspoon	Do not apply within one day of harvest. Repeat every 5-10 days or as needed.
	Cabbage Worms, Bean Beetles, Beet Webworms, Sod Webworms, Asparagus Beetles, Japanese Beetles, Lygus Bugs, Whiteflies, Garden Fleahoppers, Harlequin Bugs, Oblique-banded Leafrollers, Stink Bugs, Celery Leaf-tiers, Melon Worms, Tortoise Beetles, Garden Webworms, Alfalfa Webworms, Mites	2 teaspoons	
	Colorado Potato Beetles, Cucumber Beetles, Flea Beetles, Vegetable Weevils, Squash Bugs (nymphs), Squash Vine Borers, European Corn Borers	4 teaspoons	
Ornamentals Poplar, Linden, Dogwood, Willow, Birch, Boxelder, Maple, Oak, Elm, Pine, Spruce, Cedar, Yew, Spirea, Lilac, Zinnia, Aster, Petunia, Geranium, Dahlia, Gladiolus, Phlox, Sweet Pea, Marigold, Carnation, Chrysanthemum, Rose	Aphids, Leafhoppers, Exposed Thrips	1 teaspoon	Do not apply within one day of collection. Repeat every 5-10 days or as needed.
	Oblique-banded Leafrollers, Sawfly Larvae, Boxelder Bugs, Japanese Beetles, Elm leaf Beetle Larvae, Mites, Lygus Bugs, Lace Bugs, Greenhouse Whiteflies, Stink Bugs, Garden Fleahoppers, Greenhouse Leaf-tiers	2 teaspoons	
	Cucumber Beetles, Rose Chafers, Ants, Aster Beetles, Flea Beetles	4 teaspoons	

2 teaspoons/gallon = 1 quart/100 gallons. Treats up to 1 acre depending on density of foliage.

Fire Ants: For use in lawns, gardens, around buildings, agricultural land, golf courses, campgrounds and recreational areas. Thoroughly mix 2-4 Tablespoons in 2 gallons of water and saturate the mound and surrounding area to a 4 ft. diameter. Repeat in 7-10 days or as necessary. Treat new mounds as they appear. Application should be made as a gentle rain from a sprinkler can or using low pressure spray since pressurized sprays may disturb the ants, causing migration and reducing product effectiveness.

DISCLAIMER: Buyer assumes all risks of use, storage or handling not in strict accordance with directions given herewith.

For information on pesticide products (including health concerns, medical emergencies, or pesticide incidents, call the National Pesticide Telecommunications Network at 1-800-858-7378.

Manufactured by
Bonide Products, Inc.
Oriskany, NY 13424

