

16-91

5/13/2002

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 13, 2002

CERTIFIED MAIL

361
13

S-615-600

Dragon Corporation
P.O. Box 7311
Roanoke, VA 24019

Attention: Mr. Alan Campbell

Subject Rotenone 1% Dust
EPA Reg. No. 16-91
Review of Final Printed Labeling
Our letter of July 17, 1997
Your labels received November 4, 1999, and March 21, 2000
Our telephone call of February 17, 2000

The purpose of this letter is to communicate the results of our review of your final printed label for the currently marketed product and your last Confidential Statement of Formula (CSF).

A. Review of Final Printed Labeling

Our 7-17-1997 letter In July 1997, we processed a labeling amendment for this product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). On July 17, 1997, we stamped your submitted label "accepted" with two comments with the condition that you submit the final version of the label before you shipped the final version of the label.

Your label received 11-4-1999 We received a final printed label on November 4, 1999. However, it did not contain all of the text of the previously approved version of the label. Further a cover letter did not accompany the submission so we were unclear of the exact purpose of the new label.

Our telephone call of 2-17-2000 On February 17, 2000, we left a message for Susan Crewey of Bonide, seeking clarification of the labeling submitted in November 1999, and requesting final printed labeling conforming to our July 17, 1997 letter.

Your label received 3-21-2000 We received a final printed label on March 21, 2000. It contained the revised text. However, a cover letter did not accompany the submission, and the label was filed in the administrative record without review.

The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product. A copy of the stamped label is enclosed for your records.

1. The product must conform to PR Notice 2001-1 (First Aid) and PR Notice 2001-5 (Homeowner Disposal Statements). See attached guidance.
2. Make sure that the label complies with the minimum type size requirements.
3. The following statements, which have all appeared on labels submitted to the Agency in recent years, are unacceptable because they are false or misleading:

Nothing Beats The Dragon
 RECOMMENDED FOR ORGANIC GARDENERS
 ORGANIC INSECT CONTROL

4. The referral statement, "See back panel for additional precautionary." is less than the minimum Point 6 Type and is unreadable.

Existing stocks of labels Stocks of existing labels may be used for eighteen (18) months.

Consequence for non-compliance If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of this condition.

B. Review of Last Submitted Confidential Statement of Formula (CSF)

Review of last CSF We have reviewed your last CSF, which was dated June 1, 1989, and found it to be unacceptable for the following reasons:

1. The CSF assumes that the source products contain 5.0% Rotenone and 5.0% Other Associated Resins. However, those source products now contain 7.4% of these actives. You need to modify the values on your CSF so that you have a product with a the nominal concentration of 1% Rotenone, as stated on your label.
2. You need to insert the nominal concentration in Block 13b in brackets under the value in the same Block.
3. You need to fill in Blocks 14a and 14b for your second ingredient.
4. You need to modify the information on your sources if it has changed.

Within 30 days of receipt of this letter, submit a revised CSF.

EPA contact If you have any questions about this letter, please contact me by phone (703-305-5407), fax (703-305-6596), or E-Mail (peacock.dan@epa.gov).

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosure

1. First Aid text
2. Disposal text
3. Minimum Type Size Requirements for Final Printed Labeling

4 8 8

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 13 2002

Under the Federal Insecticide, Fungicide, and Plant Growth Regulator Act, this product is **REGISTERED STRICTLY IN ACCORDANCE WITH LABEL DIRECTIONS, WARNINGS, AND DIRECTIONS; AND IN CONFORMITY WITH FEDERAL & STATE REGULATIONS**, registered under EPA Reg. No. 16-91



ROTENONE 1% DUST

Organic Insect Control.

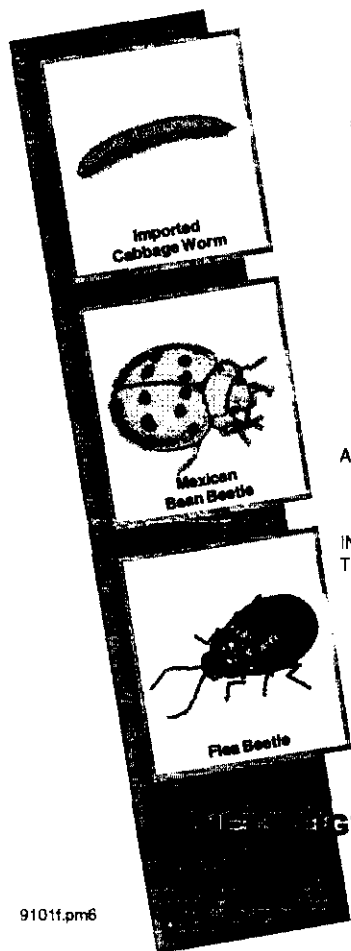
Use On Vegetables-Potatoes, Beans, Squash, Cucumbers, Collards, Cabbage, Greens, Kale, Broccoli-Flowers And Shrubs.

ACTIVE INGREDIENTS:	
Rotenone	1.00%
Other Associated Resins	1.53%
INERT INGREDIENTS: ...	97.47%
TOTAL	100.00%

Keep Out of Reach
of Children
CAUTION

See back panel for additional precautions.

NET WEIGHT 1 LB



PRECAUTIONARY STATEMENTS

Hazards to Humans
& Domestic Animals

CAUTION: Avoid inhalation of dust. Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin. Wear long-sleeved work clothing. Take shower or bath after work. Wash hands before eating or smoking.

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.

FIRST AID

IF SWALLOWED: Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Call a physician or Poison Control Center. Do not induce vomiting or give anything by mouth to an unconscious person.
IF INHALED: Remove victim to fresh air. Apply artificial respiration, preferably mouth to mouth, if indicated.
IF IN EYES: Flush eyes with plenty of water. Get medical attention.
IF ON SKIN: Remove contaminated clothing. Wash skin with soap and water. Launder clothes before reuse.

DIRECTIONS FOR USE

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

Use Restrictions: For use on home vegetable gardens and ornamentals only.

Mixing: Do not mix the contents of this package with water.

Application Method: Apply a thin, uniform covering to the upper and lower leaf surfaces with a garden hand duster. One pound treats approximately 400 linear feet of row.

BEANS: To control Mexican Bean Beetle, Bean Leaf Beetle, Cucumber Beetle, Flea Beetle, Thrips, Twelve-spotted Beetle, dust as the adult beetles appear. Repeat application as necessary.

CUCUMBERS, PUMPKINS, SQUASH: Apply as directed above to control Cucumber Beetle. Begin early and repeat as necessary. To control Squash Vine Borer on pumpkins and squash, apply once or twice a week to stems and vines at base of plants.

BROCCOLI, CABBAGE, CAULIFLOWER, CARROTS, COLLARDS, KALE, TURNIPS, MUSTARD GREENS: Apply as directed above to control Vegetable Weevil, Imported Cabbageworm.

ASPARAGUS: Apply as directed above, as soon as larvae appear, to control Asparagus Beetle.

SWEET CORN: To control European Corn Borer, make the first application as soon as young borers appear on leaves. Start applications in late May or early June for first brood, and in late July or early August for second brood. Make four applications at exactly five day intervals. Direct the dust downward into the whorls or crowns and leaf axils.

POTATOES: Apply as directed above to control Potato Beetle, as soon as larvae begin feeding.

FLOWERS & SHRUBS: To control many external leaf-chewing insects, apply as soon as insects appear, and repeat at weekly intervals as long as the insects continue to appear. Examples of the types of insects that may be controlled are Cabbage Looper on camellia, chrysanthemum and geranium, Flea Beetle on petunia and primrose, Imported Cabbage Worm on nasturtium, nigronette and sweet alyssum; Rose Chafer on rose and peony; Asiatic Garden Beetle on petunia, pHox and rose.

FOR DOGS & CATS:

Pre-treatment Directions
READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS OR CATS TO KILL FLEAS AND LICE: Do not use on animals under 12 weeks.

Special Animals: Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing or medicated animals.

Adverse Reaction Information: 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 immediately.

Application Directions: Dust pet thoroughly, including head (except eyes, mouth and nose), back, sides, legs, ears and tail. Avoid any sores. Rub into fur. Dust sleeping quarters and replace bedding if necessary.

Reapplication Directions: Do not reapply product for 10 days.

Storage and Disposal

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

Storage: Store only in original container, in a cool, dry place inaccessible to children and pets and away from feed and foodstuffs.

Pesticide Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

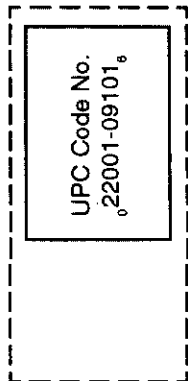
Container Disposal: Do not reuse empty container. Securely wrap container and discard in trash.

NOTICE: Buyer assumes all risks of use, storage or handling of this material not in accordance with DIRECTIONS and CAUTIONS stated on this label.

EPA Reg. No. 16-91
EPA Est. 16-VA-1

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3/99

Manufactured by:
DRAGON CHEMICAL CORPORATION
Roanoke, VA 24019-7311



DRAGON

PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

CAUTION: Avoid inhalation of dust. Harmful if swallowed, inhaled, or absorbed through skin. Avoid contact with skin. Wear long-sleeved work clothing. Take shower or bath after work. Wash hands before eating or smoking.

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.

DRAGON

**ROTENONE
1% DUST**



Imported Cabbage Worm



Mexican Bean Beetle



Flea Beetle

Organic Insect Control.

Use On Vegetables - Potatoes, Beans, Squash, Cucumbers, Collards, Cabbage, Greens, Kale, Broccoli - Flowers And Shrubs.

ACTIVE INGREDIENTS:
Rotenone 1.00%
Other Associated Resins 1.53%
INERT INGREDIENTS: 87.47%
TOTAL: 100.00%

**Keep Out of Reach of Children
CAUTION**

See side panels for additional precautions.

EIGHT 4 LB

UPC Code No.
.22001 09104,

DRAGON

Storage & Disposal

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

Storage: Store only in original container in a cool, dry place inaccessible to children and pets, and away from feed and foodstuffs.

Pesticide Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

Container Disposal: Do not reuse empty container. Wrap container and put in trash collection.

NOTICE

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with DIRECTIONS and CAUTIONS stated on this label.

DRAGON

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL CAUTIONS, WARNINGS AND DIRECTIONS; AND IN CONFORMITY WITH FEDERAL & STATE REGULATIONS.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with labeling. Do not mix the contents of this package with water. Apply to the plant with a garden duster or other appropriate applicator.

RATE OF APPLICATION: Apply at a rate to give a thin, uniform covering to the upper and lower leaf surfaces. One pound treats approximately 400 linear feet of row.

BEANS: To control Mexican Bean Beetle, Bean Leaf Beetle, Cucumber Beetle, Flea Beetle, Trips, Twelve-spotted Beetle, dust as the adult beetles appear. Repeat application as necessary.

CUCUMBERS, PUMPKINS, SQUASH: Apply as directed above to control Cucumber Beetle. Begin early & repeat as necessary. To control Squash Vine Borer on pumpkins and squash, apply once or twice a week to stems and vines on bush or plants.

BROCCOLI, CABBAGE, CAULIFLOWER, CARROTS, COLLARDS, KALE, TURNIPS, MUSTARD GREENS: Apply as directed above to control Vegetable Weevil, Imported Cabbageworm.

ASPARAGUS: Apply as directed above, as soon as larvae appear, to control Asparagus Beetle.

SWEET CORN: To control European Corn Borer, make the first application as soon as young borers appear on leaves. Start applications in late May or early June for first brood, and in late July or early August for second brood. Make four applications at exactly five day intervals. Direct the dust downward into the whorls or crowns and leaf axils.

POTATOES: Apply as directed above to control Potato Beetle, as soon as larvae begin feeding.

FLOWERS & SHRUBS: To control many external leaf-chewing insects, apply as soon as the insects appear, and repeat at weekly intervals as long as the insects continue to appear. Examples of the types of insects that may be controlled are: Cabbage Looper on carnation, chrysanthemum and geranium; Flea Beetle on petunia and primrose; Imported Cabbage Worm on nasturtium, mignonette and sweet alyssum; Rose Chaler on rose and peony; Asiatic Garden Beetle on petunia, phlox and rose.

FOR DOG & CATS: To control lice and fleas, apply to all parts of the animal, rubbing it thoroughly down to the skin. Special attention should be given to the neck and base of the tail. Repeat in 10 days. Do not use on puppies or kittens less than 4 weeks old.

EPA Reg. No. 16-91

EPA Est. 16-VA-1

Manufactured by
DRAGON CORPORATION
Roanoke, VA 24019-7311

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Minimum Type Sizes for Final Printed Labels

Size of Label on Front Panel in Square Inches	Minimum Type Size	
	SIGNAL WORD [All Capitals] [40CFR156.10(h)(1)(v)] and "Restricted Use Pesticide" [40CFR156.10(i)(2)(i)(A)]	"Keep Out of Reach of Children" [40CFR156.10(i)(2)(i)(B)] and "Storage and Disposal" [40CFR156.10(i)(2)(i)(C)]
5 and under	6 point	6 point
above 5 to 10	10 point	6 point
above 10 to 15	12 point	8 point
above 15 to 30	14 point	10 point
over 30	18 point	12 point

Note: No type on label can be less than 6 Point. [40CFR156.10(i)(2)(i)(A)]

18 point
12 point
12 point

POISON DANGER WARNING CAUTION
KEEP OUT OF REACH OF CHILDREN
Keep Out of Reach of Children

14 point
10 point
10 point

POISON DANGER WARNING CAUTION
KEEP OUT OF REACH OF CHILDREN
Keep Out of Reach of Children

12 point
8 point
8 point

POISON DANGER WARNING CAUTION
KEEP OUT OF REACH OF CHILDREN
Keep Out of Reach of Children

10 point
6 point
6 point

POISON DANGER WARNING CAUTION
KEEP OUT OF REACH OF CHILDREN
Keep Out of Reach of Children

6 point
6 point
6 point

POISON DANGER WARNING CAUTION
KEEP OUT OF REACH OF CHILDREN
Keep Out of Reach of Children

FIRST AID	
Have label with you when obtaining treatment advice.	
If swallowed	<ul style="list-style-type: none"> •Call a poison control center, doctor, or 1-800-xxx-xxxx¹ 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.²
If on skin or clothing	<ul style="list-style-type: none"> •Take off contaminated clothing. •Rinse skin immediately with plenty of water for 15-20 minutes. •Call a poison control center, doctor, or 1-800-xxx-xxxx immediately for treatment advice.
If inhaled	<ul style="list-style-type: none"> •Move person to fresh air. •If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. •Call a poison control center, doctor, or 1-800-xxx-xxxx immediately for treatment advice.
If in eyes	<ul style="list-style-type: none"> •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, doctor, or 1-800-xxx-xxxx immediately for treatment advice.

C:\dpeacock\Dan Peacock\First Aid\Format for First Aid Statements2.wpdAugust 1, 2001

¹Toll free telephone number is optional throughout.

²Use all statements for each route of exposure if Toxicity Category is 1, 2, or 3. Statements are optional if Toxicity Category is 4.

**Format Labeling for Homeowner Disposal Statements
Non-Pressurized Container**

STORAGE AND DISPOSAL

STORAGE: Store only in original container, in a dry place inaccessible to children and pets.

DISPOSAL: If empty: Do not reuse empty container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or [toll free number which meets the criteria in paragraph II.E. of PR Notice 2002-6] for disposal instructions. Never place unused product down any indoor or outdoor drain.