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432-525

9/12/97

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Agrevo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

Attention: Mr. Joseph A. Conti

Subject: Powdered Cube Root
EPA Reg. No. 432-525 ✓
Cube Powder Fish Toxicant
EPA Reg. No. 432-829
Your amended applications of September 16, 1996,
June 26, and July 31, 1997
Cal/EPA's letters of August 14 and 29, 1997

We have reviewed the above applications and have the following comments.

I. Use Deletion (Amended Application of September 16, 1996)

Your request to delete the insecticide uses for Powdered Cube Root, EPA Reg. No. 432-525, is acceptable.

II. Additional Brand Name

Your additional brand name, Pro-Noxfish Dust Fish toxicant, for Cube Powder Fish Toxicant, EPA Reg. No. 432-829, is acceptable.

III. Change in Classification and Precautionary Statements (Amended Application of June 26, 1997)

Your submitted a set of acute toxicity tests that the Agency required in the 1988 Rotenone Standard for manufacturing-use products and that your company contracted for in 1991. Your company had forgotten to submit them to the Agency.

You submitted these studies, listed below, to both the EPA and the California Department of Pesticide Regulation, which reviewed these studies. The results of that review were as follows:

Study	MRID No.	Tox Cat
1. Acute Oral	443121-01	I
2. Acute Dermal	-02	III
3. Acute Inha- lation	-03	I
4. Primary Eye	-04	III
5. Primary Dermal	-05	IV
6. Dermal Sensi-	-06	n/a

(positive sensitizer)

If you repeat the acute oral toxicity study and the result is Category II, then you can use the precautionary text for that category of toxicity and route of exposure. There is no need to repeat the acute inhalation study.

For both products, the labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes and submit one (1) copy to us before you ship your product:

1. For Cube Powder Fish Toxicant, EPA Reg. No. 432-829, add the following "Restricted Use Pesticide" statement to the top of the Front Panel:

RESTRICTED USE PESTICIDE
Due to Aquatic, Acute Oral and Inhalation Toxicity

For retail sale to, and use only by, Certified Applicators, or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

2. Change the first sentence under "DANGER" to:

Fatal if inhaled or swallowed.

- 3. Print "POISON" and "Skull and Crossbones" in red.
- 4. Change "Practical Statement of Treatment" to "FIRST AID".
- 5. Under "FIRST AID", reorder the text as follows:

IF INHALED
 IF SWALLOWED ...
 IF IN EYES ...
 IF ON SKIN ... persist.

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 bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely,

DBP

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

- Enclosures: 1. Stamped Labels
 2. A-79 Enclosure

Peacock WP#13:A:\Rotenone\432-525.Sep:305-5407:9/12/97

POWDERED CUBE ROOT

* FOR THE FORMULATION OF INSECTICIDES AND PISCICIDES ONLY
* NOT FOR RESALE UNDER THIS LABEL

ACTIVE INGREDIENTS:

Rotenone* 7.4%
Other Associated Resins 11.1%

INERT INGREDIENTS: 81.5%
100.00%

*Nominal concentration. See certificate of analysis for actual rotenone content.

PRECAUCION AL CONSUMIDOR: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

EPA REG. 432-525

EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN

DANGER



POISON



STATEMENT OF PRACTICAL TREATMENT

IF INHALED: Remove victim to fresh air. If not breathing give artificial respiration preferably mouth-to-mouth. Get medical attention.

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

See Side Panel For Additional
Precautionary Statements

ACCEPTED
COMMENTS
EPA Letter Dated:

SEP 12 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
432-525
NET WEIGHT:

PRECAUTIONARY STATEMENTS Hazards To Humans & Domestic Animals

DANGER

Fatal if inhaled. May be fatal if swallowed. Harmful if absorbed through the skin. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not breathe dust. Use a dust filtering respirator (MSHA/NIOSH approval number prefix TC-21C). Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse.

Environmental Hazards

This pesticide is extremely toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

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

Storage: Store in a dry place away from excessive temperature extremes.

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: 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 smoke.

Powdered Cube Root is intended for use in the formulation of fish control products.

This product may be formulated into end-use products for the following acceptable uses: Piscicides Uses (Aquatic Non-Crop Uses).

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TERMS OF SALE AND WARRANTY

AgrEvo Environmental Health warrants that this product conforms to the chemical description on the label, and is reasonably fit for the purposes referred to in the DIRECTIONS FOR USE. No other expressed or implied warranty of fitness or merchantability is made or any other expressed or implied warranty. AgrEvo Environmental Health shall in no case be liable for consequential, special or indirect damages resulting from the use or handling of this product. AgrEvo Environmental Health offers this product and the buyer accepts it subject to the foregoing conditions of sale and warranty. These may be varied only by agreements in writing signed by duly authorized representatives from AgrEvo Environmental Health.

AgrEvo Environmental Health
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