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PM 17

Emily P. Nedal  
Penick Corporation  
1050 Wall Street West  
Lyndhurst, NJ 07071

**BEST AVAILABLE COPY**

MAR 14 1985

Dear Ms. Nedal:

Subject: WOXFIRE Insecticide with Rotenone EC 5a  
Formula II  
EPA Registration No. 432-677

The amendments submitted with your letter of January 25, 1985, are acceptable. However since you originally proposed both home (agricultural) garden use and "commercial" agricultural use, there was some confusion regarding the applicability of precautionary label statements pertaining to farmworker safety. Products intended for home (agricultural) garden use do not need precautionary labeling relating to farmworker safety while products intended for commercial agricultural use do. Since your product labeling is clearly intended for commercial agricultural use (i.e., product labeling with tank mixing for an acre and marketed in 5 gallon, 30 gallon and 55 gallon containers), the product labeling must bear the full complement of precautionary labeling for farmworker safety. For the specific requirements regarding precautionary language for farmworker safety refer to PR Notice 83-2 - Label Improvement Program for Farmworker Safety.

To resolve the immediate problem regarding this label, I am prepared to grant a 6-month compliance extension from the requirements of the label improvement program, on the condition that you revise the product label to include all of the required precautionary language for farmworker safety.

If you have any questions regarding this issue, please contact me or Richard King at (703) 557-2690.

Sincerely yours,

Timothy A. Gardner  
Product Manager (17)  
Insecticide-Rodenticide Branch  
Registration Division (78-767)

RD-IRB:JOB-51490:R.King:RD-80:EK:Kendrick:898-1270:3/1/85:3/12/85

CONCURRENCES

75-267							

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# NOXFIRE™ INSECTICIDE with ROTENONE EMULSIFIABLE CONCENTRATE 5% FIRE ANT DRENCH FORMULA II

Contains 0.39 lb/gal (47 g/L) of Active Ingredient  
KILLS COLORADO POTATO BEETLES

**ACTIVE INGREDIENTS:**

Rotenone .....	5.0%w/w
Other Cube Extractives .....	10.0%
Aromatic Petroleum Solvent .....	74.0%
<b>INERT INGREDIENTS:</b> .....	11.0%
	100.0%w/w

TM Penick Corporation Trademark

**PRECAUCION AL CONSUMIDOR:** Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada amplemente.  
**TRANSLATION:** (TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

**KEEP OUT OF REACH OF CHILDREN  
WARNING**

SEE SIDE PANEL FOR ADDITIONAL  
PRECAUTIONARY STATEMENTS AND  
STATEMENT OF PRACTICAL TREATMENT

EPA Reg. No. 432-677

EPA Est. 432-NJ-1

P-85-201

NET CONTENTS:      GALLONS (      Liters)

**PENICK** Penick Corporation

1050 Wall Street West, Lyndhurst, N.J. 07071 U.S.A.

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS  
WARNING**

May be fatal if swallowed. Harmful if absorbed through clothing. Wash thoroughly with soap and water after use.

**STATEMENT OF PRACTICAL TREATMENT**

If swallowed: Call a physician or Poison Control Center. Do not induce vomiting. If on skin: Wash with plenty of soap and water. Get medical attention if in eyes. Flush with plenty of water.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. Keep out of lakes, streams, rivers, and ponds. Do not use for cleaning of equipment or disposal of wastes.

**PHYSICAL HAZARDS**

Flammable. Do not use or store near heat or open flame.

**DIRECTIONS FOR USE**

If in violation of Federal law to use this product without proper labeling.

**STORAGE & DISPOSAL**

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

**STORAGE:** Store product in original container in a cool, dry place.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product should be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then puncture and dispose of in a sanitary landfill, or by other means approved by local authorities.

**DIRECTIONS FOR USE (Continued)**

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**NOXFIRE™ INSECTICIDE with ROTENONE**  
**Emulsifiable Concentrate 5% Fire Ant Drench**  
**Formula II**  
**EPA Reg. No. 432-677**

**DIRECTIONS FOR USE (continued)**

**FIRE ANTS:**

For use in lawns, gardens, grounds around buildings, fields, agricultural land, waste land, golf courses, recreational areas, campgrounds.

For control of an individual fire ant mound measuring 2-9 inches (5-25 cm) high and 5-21 inches (12-60 cm) in diameter, mix 1 tablespoon (14.6 ml) of Rotenone 5% EC in 2 gallons of water (7.57 L) and thoroughly agitate until completely mixed.

Apply this mixture to the undisturbed mound by first using some on the dome to soften the crust. Then use some to completely soak the perimeter. The remainder should be poured from a height of about 3 ft (1m) so as to break into the dome and allow the mixture to flow into the underground ant tunnels. Repeat in 7-10 days or as necessary. For larger mounds, apply greater volumes of diluted material.

**COLORADO POTATO BEETLES:**

To make a tank mix that will effectively combat the Colorado Potato Beetle on potatoes, tomatoes, and eggplant, mix 82 fl. ozs. (0.25 lb. active ingredient) of Noxflre and 8 fl. ozs. (0.5 lb active ingredient) of Piperonyl Butoxide 92% E.C. (EPA Reg. No. 432-673) with the volume of water desired to cover one acre. Application should be made as late in the day as possible.

**WARRANTY STATEMENT**

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.

