

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JAN 28 2003

Ms. Nancy Cave
Prentiss Incorporated
C. B. 2000
Floral Park, NY 11002-2000

Dear Ms. Cave:

Subject: Revised Labeling and Basic Confidential Statement of Formula
Prentox Rotenone Fish Toxicant Powder
EPA Registration No. 655-691
Your Submission Dated June 4, 2002

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. The Confidential Statement of Formula (CSF) for the basic formulation dated June 21, 2002 has been reviewed and is acceptable. This basic CSF supercedes all previous basic and alternate formulations and is therefore the only approved formulation for this product.

If you have any questions regarding this letter, please contact me (703) 308-6249.

Regards,

A handwritten signature in cursive script, appearing to read "John D. Hebert".

John Hebert
Insecticide-Rodenticide Branch
Registration Division (7505C)

Best Available Copy

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Prentox Rotenone Fish Toxicant Powder
EPA Reg. No. 655-691

RESTRICTED USE PESTICIDE
DUE TO AQUATIC, ACUTE ORAL AND INHALATION TOXICITY
For retail sale to, and use by, Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.



ROTENONE FISH TOXICANT POWDER

ACTIVE INGREDIENTS:

Rotenone- Minimum Guaranteed 74 8.74% w/w
Other Associated Resins 11 13.11%

OTHER INGREDIENTS: 81.5 78.15%
TOTAL 100.00% w/w

ROTENONE ASSAY _____ ROTENONE _____

PRENTOX® - Registered Trademark of Prentiss Incorporated

KEEP OUT OF REACH OF CHILDREN	
	DANGER POISON
	
FIRST AID	
Have the product container or label with you when calling a poison control center or physician, or going for treatment.	
If swallowed	<ul style="list-style-type: none"> • Call a Poison Control Center, physician, or the National Pesticide Telecommunications Network at 1-800-858-7378 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 physician. • Do not give anything by mouth to an unconscious or convulsing person.
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, physician, or the National Pesticide Telecommunications Network at 1-800-858-7378 for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a Poison Control Center, physician, or the National Pesticide Telecommunications Network at 1-800-858-7378 for treatment advice.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a Poison Control Center, physician, or the National Pesticide Telecommunications Network at 1-800-858-7378 for treatment advice.
For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Telecommunications Network at 1-800-858-7378.	
SEE INSIDE LEAFLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND DIRECTIONS FOR USE	

E.P.A. REG. NO. 655-691

E.P.A. EST. NO. 655-GA-1

Manufactured by:

PRENTISS INCORPORATED

Plant: Kaolin Road, Sandersville, GA 31082
Office: C.B. 2000, Floral Park, NY 11002-2000

ACCEPTED

JAN 28 2003

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

655-691

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER

Fatal if inhaled or 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/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P or HE filter. 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. Fish kills are expected at recommended rates. Consult your State Fish and Game Agency before applying this product to public waters to determine if a permit is needed for such an application. Do not contaminate untreated water when disposing of equipment washwaters.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
STORAGE: Store only in original container in a dry place inaccessible to children and pets. If spilled, sweep up and dispose of as below.
PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of bag in a sanitary landfill or by incineration, or if allowed by State and local authorities by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE

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

USE RESTRICTIONS:

Use against fish in lakes, ponds, and streams (immediately above lakes and ponds).

Since such factors as pH, temperature, depth, and turbidity will change effectiveness, use this product only at locations, rates, and times authorized and approved by appropriate state and Federal fish and wildlife agencies. Rates must be within the range specified in the labeling.

Properly dispose of dead fish and unused product. Do not use dead fish as food or feed.

Do not use water treated with rotenone to irrigate crops or release within 1/2 mile upstream of a potable water or irrigation water intake in a standing body of water such as a lake, pond or reservoir.

Note to User: Adjust pounds of Rotenone according to the actual Rotenone Assay as noted under the Ingredient Statement on this label. For example, if the required amount of 5% rotenone is 21 pounds, and the Rotenone Assay is 7%, use 7/10 of 21 pounds or 15 pounds of this product to yield the proper amount of active rotenone.

APPLICATION DIRECTIONS:

Treatment of Lakes and Ponds

1. Application Rates and Concentrations of Rotenone

The actual application rates and concentrations of rotenone needed to control fish will vary widely, depending on the type of use (e.g. selective treatment, normal pond treatment, etc.) and the factors listed above. The table below is a general guide for the proper rates and concentrations.

2. Total Amount of Product Needed for Treatment

To determine the total number of pounds needed for treatment, divide the number of acre-feet covered by one pound for a specific type of use (e.g., selective treatment, etc.), as indicated in the table below, into the number of acre-feet in the body of water.

General Guide to the Application Rates and Concentrations of Rotenone Needed to Control Fish in Lakes and Ponds¹

Type of Use	No. of Acre-Feet Covered by One Pound	Parts Per Million	
		Active Rotenone	5% Product
Selective Treatment	3.7 to 2.8	0.005 - 0.007	0.10 - 1.3
Normal Pond Use	0.74 to 0.37	0.025 - 0.050	0.5 - 1.0
Remove Bullheads or Carp	0.37 to 0.185	0.050 - 0.100	1.02 - 2.0
Remove Bullheads or Carp in Rich Organic Ponds	0.185 to 0.093	0.100 - 0.200	2.0 - 4.0
Pre-impoundment Treatment above Dam	0.123 to 0.074	0.150 - 0.250	3.0 - 5.0

¹Adapted from Kinney, Edward, 1965 Rotenone in Fish Pond Management. USDI Washington, D.C. Leaflet FL-576.

Computation of acre-feet for lake or pond: An acre-foot is a unit of water volume having a surface area of one acre and a depth of one foot. Make a series of transects across the surface, taking depths with a measured pole or weighted line. Add the measurements and divide by the

number made to determine the average depth. To compute total acre-feet, multiply this average depth by the number of surface acres, which can be determined from an aerial photograph or plat drawn to scale.

3. Pre-Mixing Method of Application

Pre-mix one pound of Rotenone with 3 to 10 gallons of water. Uniformly apply over water surface or bubble through underwater lines.

Alternately place undiluted powder in burlap sack and trail behind boat. When treating deep water (20 to 25 feet) weight bag and tow at desired depth.

4. Removal of Taste and Odor

Rotenone treated waters do not retain a detectable taste or odor for more than a few days to a maximum of one month. Taste and odor can be removed immediately by treatment with activated charcoal at a rate of 30 ppm. for each 1 ppm. Rotenone remaining (Note: As Rotenone detoxifies, less charcoal is required).

5. Restocking

Waters treated with this product detoxify within 2 to 4 weeks after treatment, depending on pH, temperature, water hardness, and depth. To determine if detoxification has occurred, place live boxes containing samples of fish to be stocked in treated waters. More rapid detoxification can be accomplished by adding Potassium Permanganate or chlorine at a 1:1 ratio with the concentration of rotenone applied, plus sufficient additional compound to satisfy the chemical oxidation demand caused by organic matter that may be present in the treated water.

Treatment of Streams Immediately Above Lakes and Ponds

The purpose of treating streams immediately above lakes and ponds is to improve the effectiveness of lake and pond treatments and not to control fish in streams per se. The term "immediately" means the first available site above the lake or pond where treatment is practical.

In order to treat a stream immediately above a lake or pond, you must select a concentration of active rotenone, compute the flow rate of a stream, calculate the application rate, select an exposure time, estimate the amount of product needed, and follow the method of application.

1. Concentration of Active Rotenone

Select the "Concentration of Active Rotenone" based on the type of use from those on the table. For example, if you select "Normal Pond Use" you could select a concentration of "0.025 Parts per Million".

2. Computation of Flow Rate for Stream

Select a cross section of the stream where the banks and bottom are relatively smooth and free of obstacles. Divide the surface width into 3 equal sections and determine the water depth and surface velocity at the center of each section. In slowly moving streams, determine the velocity by dropping a float attached to 5 feet of loose, monofilament fishing line. Measure the time required for the float to move 5 feet. For fast-moving streams, use a longer distance. Take at least three readings at each point. To calculate the flow rate from the information obtained above, use the following formula:

$$F = \frac{W_s \times D \times L \times C}{T}$$

where F = flow rate (cu. ft./sec.), W_s = surface width (ft.), D = mean depth (ft.), L = mean distance traveled by float (ft.), C = constant (0.8 for rough bottoms and 0.9 for smooth bottoms), and T = mean time for float (sec.).

For example, after using the above formula, you might have computed the stream's flow rate to be "10 cu. ft. per sec.".

3. Calculation of Application Rate

In order to calculate the application rate (expressed as "pound per sec"), you convert the rate in the table (expressed as "pound per acre-foot"), to "pound per cu. feet" and multiply by the flow rate (expressed as "cu. ft. per sec."). Depending on the size of the stream and the type of equipment, the rate could be expressed in other units, such as "ounces per hr."

The application rate for the stream above is calculated as follows:

$$R_s = R_p \times C \times F$$

where R_s = Application Rate for Stream (lb/sec), R_p = Application Rate for Pond (lb/acre feet), C = 1 acre foot/43560 cu. ft., and F = Flow Rate (cu. ft./sec).

In the example, the Application Rate for Stream would be:

$$R_s = 1 \text{ lb}/0.74 \text{ acre-foot} \times 1 \text{ acre-foot}/43560 \text{ cu. ft.} \times 10 \text{ cu. ft./sec.}$$

$$R_s = .00031 \text{ lb/sec or } 17.9 \text{ oz./hr.}$$

4. Exposure Time

The "Exposure Time" would be the period of time (expressed in hours or seconds) during which target fish should not enter the lake or pond under treatment. In the example, this period of time could be 4 hours.

5. Amount of Product

Calculate the "Amount of Product" for a stream by multiplying the "Application Rate for Stream" by the "Exposure Time". In the example, the "Amount of Product" would be 71.6 oz. (17.9 oz./hr. x 4 hr.) or 4.5 lb.

RE-ENTRY STATEMENT

Do not allow swimming in rotenone-treated water until the application has been completed and all pesticide has been thoroughly mixed into the water according to labeling instructions.

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