	]			NMENTAL PROTE ffice of Pesticide Pro		ENCY	EPA Reg. Number:		Date of Issuance:
AT UNITED ST	MARS. E			pistration Division (H 401 "M" St., S.W	(7505C)				JUL 15 1999
	NIROLING PROTECTO		. ,	Washington, D.C. 20			655-803		
G( PRO		NOT	CE OF PI	ESTICIDE:			Term of Issua	ince:	
			<u>x</u> Regi						
			Rere	gistration			Name of Pesti	jcide Produ	ct:
inder FIFRA,	as amende	d							
	,						Prentox Manager		-
ame and Add	tress of Reg	jstrant (inclu	de ZIP Code):						
rentiss	-	orated							
C.B. 200 1 Verno		et							
loral Pa									
<u>.                                    </u>									<u> </u>
							st be submitted to an A registration number		by the Registration Division
ior to use of	ine lapel in	commerce.	n any conceptin	•	-				
n the basis of	f informatio					eby registered/rer	gistered under the Fe	ederal Insec	ticide, Fungicide and
On the basis of odenticide A Registration is Administrator,	f informatio ct. in no way t on his mot	o be construion, may at	oy the registrant, ed as an endorser ny time suspend	the above named per ment or recommenda or cancel the registra	sticide is her ation of this j ation of a per	product by the Ag sticide in accordan	ency. In order to pro ce with the Act. The	otect health e acceptance	ticide, Fungicide and and the environment, the e of any name in connection use if it has been covered by
In the basis of codenticide Au- cegistration is administrator, with the registrator, with the registrator, thers.	f informatic ct. in no way i on his mot ration of a p produc uply wit	n furnished o be constru- ion, may at roduct unde t is con h the fo	by the registrant, and as an endorser ny time suspend this Act is not to ditionally 1	the above named per ment or recommenda or cancel the registra o be construed as giv registered in	ation of this p ation of a per ation of a per sting the regis	product by the Ag sticide in accordan trant a right to exc ance with I	ency. In order to pro ce with the Act. The dusive use of the nam	ptect health e acceptance ne or to its t B(c)(7)(	and the environment, the e of any name in connection
In the basis of codenticide Au- codenticide Au- tegistration is comministrator, with the registra- thers. This p you com ship you 1. Su Droduct	f informatic ct. in no way 1 on his mot ration of a p produc uply wit r produc ubmit a under	n furnished o be constru- ion, may at roduct unde t is con h the fo act. nd/or c FIFRA	by the registrant, and as an endorser ny time suspend this Act is not to ditionally r llowing ar te all data	the above named per ment or recommenda or cancel the registra o be construed as giv registered in nd submit on or other ma 5) or FIFRA	esticide is her ation of this j ation of a per ating the regis accordiane (1) ccontentiterial recontent	product by the Ag sticide in accordan trant a right to exc ance with I opy of final equired for	FIFRA sec. 3 printed labe registration/	e acceptance ne or to its t 8(c)(7)( eling to freregis	and the environment, the e of any name in connection use if it has been covered by (A) provided that
In the basis of codenticide Au registration is definitistrator, with the registrator thers. This p you com ship you 1. Su product similar p	f informatic ct. in no way i on his mot ration of a p produc uply wit r produ ubmit a under 1 product	n furnished o be constru- ion, may at irroduct unde t is con h the fo act. nd/or c FIFRA s to sub	by the registrant, ed as an endorser ny time suspend this Act is not to ditionally r llowing ar te all data sec. 3(c)(5 mit such d	the above named per ment or recommenda or cancel the registra o be construed as giv registered in nd submit on or other ma 5) or FIFRA	ation of this j ation of a per- sing the regis accordine (1) co iterial re- sec. 4 v	product by the Ag sticide in accordan trant a right to exc ance with I opy of final equired for when the A	ency. In order to pro ce with the Act. The clusive use of the nam FIFRA sec. 3 printed labe registration/ gency requir	b (c)(7)( b)(7)( c)(7)( c)(7)( c)(7)( c)(7)( c)(7)(7)( c)(7)(7)(7)(7)(7)(7)(7)(7)(7)(7)(7)(7)(7)	and the environment, the e of any name in connection use if it has been covered by (A) provided that us before you tration of your egistrants of
In the basis of codenticide Au- tegistration is comministrator, with the registrator thers. This p you com they you com thip you 1. Su product similar p 2. Ru 3. Ci	f informatic f informatic in no way 1 on his mot ration of a p produc uply with r produc ubmit a under 1 product eplace hange	n furnished o be constru- ion, may at oroduct unde t is con h the fo uct. nd/or c FIFRA s to sub the phr- 'fish an	by the registrant, ed as an endorser ny time suspend this Act is not to ditionally r llowing ar te all data sec. 3(c)(5 mit such d use "EPA 1 d Wildlife"	the above named per ment or recommenda or cancel the registra o be construed as giv registered in nd submit on or other ma i) or FIFRA lata.	ation of this 1 ation of a pes- ation of a pes- sing the regis accordi- ne (1) co nterial re- sec. 4 v 655-IN I wildliff	product by the Ag sticide in accordan trant a right to exc ance with I opy of final equired for when the A G" with "E e" in the se	ency. In order to pro ewith the Act. The dusive use of the nam FIFRA sec. 3 printed labe registration/ gency requir PA Registrat	b text health e acceptance ne or to its to B(c)(7)( elling to freregis res all re-	and the environment, the e of any name in connection use if it has been covered by (A) provided that us before you tration of your egistrants of o. 655-803"
In the basis of codenticide Au- codenticide Au- tegistration is comministrator, with the registrator of the	f informatic f informatic in no way 1 on his mot ration of a p produc uply with r produc ubmit a under 1 product eplace hange <b>CTI</b> asert "a	n furnished o be constru- ion, may at oroduct unde t is con h the for act. nd/or c FIFRA s to sub the phr- 'fish an <b>DNS</b> " s s" betw	by the registrant, ed as an endorser ny time suspend this Act is not to ditionally r llowing ar te all data sec. 3(c)(5 mit such d use "EPA I d Wildlife" ubsection o een "not" a	the above named per ment or recommenda or cancel the registra o be construed as giv registered in nd submit on or other ma b) or FIFRA lata. File Symbol ' to "fish and of the " <b>DIRI</b>	esticide is her ation of this 1 ation of a per- king the regis accordine (1) co atterial re- sec. 4 v 655-IN I wildliff ECTIO	product by the Ag sticide in accordan trant a right to exc ance with I opy of final equired for when the A G" with "E e" in the se <b>DNS FOR I</b> he third ser	ency. In order to pro ce with the Act. The Jusive use of the nam FIFRA sec. 3 printed labe registration/ gency requir PA Registra cond sentence USE".	f(c)(7)(c)	and the environment, the e of any name in connection use if it has been covered by (A) provided that us before you tration of your egistrants of o. 655-803"
on the basis of codenticide Au- codenticide Au- codenticide Au- tegistration is comministrator, with the registra- thers. This p you com the registrator, you com 1. Su oroduct similar p 2. Ru 3. Ci <b>RESTR</b> 4. In <b>CONSI</b>	f informatic ct. in no way 1 on his mot ration of a p produc uply with r produc ubmit a under 1 oroduct eplace hange <b>RICTIC</b> usert "a <b>DERA</b>	n furnished o be constru- ion, may at oroduct unde t is con h the for act. nd/or c FIFRA s to sub the phr 'fish an <b>DNS</b> " s s" betw <b>TIONS</b>	by the registrant, and as an endorser ny time suspend of this Act is not to ditionally r flowing ar the all data sec. 3(c)(5 mit such d ase "EPA I d Wildlife" absection of een "not" a " subsection	the above named per- ment or recommenda or cancel the registra o be construed as giv registered in nd submit on 0 or other ma 5) or FIFRA lata. File Symbol ' to "fish and of the " <b>DIRI</b> and "attractir on of the " <b>D</b>	esticide is her ation of this 1 ation of a per- king the regis accordine (1) co atterial re- sec. 4 v 655-IN I wildliff ECTIO	product by the Ag sticide in accordan trant a right to exc ance with I opy of final equired for when the A G" with "E e" in the se <b>DNS FOR I</b> he third ser	ency. In order to pro ce with the Act. The Jusive use of the nam FIFRA sec. 3 printed labe registration/ gency requir PA Registra cond sentence USE".	f(c)(7)(c)	and the environment, the e of any name in connection use if it has been covered by (A) provided that us before you tration of your egistrants of o. 655-803" he <b>"USE</b>
on the basis of codenticide Au- codenticide Au- codenticide Au- tegistration is comministrator, with the registra- thers. This p you com the registrator, you com 1. Su oroduct similar p 2. Ru 3. Ci <b>RESTR</b> 4. In <b>CONSI</b>	f informatic ct. in no way 1 on his mot ration of a p produc uply with r produc ubmit a under 1 oroduct eplace hange <b>RICTIC</b> usert "a <b>DERA</b>	n furnished o be constru- ion, may at oroduct unde t is con h the for act. nd/or c FIFRA s to sub the phr 'fish an <b>DNS</b> " s s" betw <b>TIONS</b>	by the registrant, and as an endorser ny time suspend of this Act is not to ditionally r flowing ar the all data sec. 3(c)(5 mit such d ase "EPA I d Wildlife" absection of een "not" a " subsection	the above named per- ment or recommenda or cancel the registra o be construed as giv registered in nd submit on or other ma b) or FIFRA lata. File Symbol ' to "fish and of the " <b>DIRI</b> and "attracti"	esticide is her ation of this 1 ation of a per- king the regis accordine (1) co atterial re- sec. 4 v 655-IN I wildliff ECTIO	product by the Ag sticide in accordan trant a right to exc ance with I opy of final equired for when the A G" with "E e" in the se <b>DNS FOR I</b> he third ser	ency. In order to pro ce with the Act. The dusive use of the nam FIFRA sec. 3 printed labe registration/ gency requir PA Registrat cond sentence USE".	f(c)(7)(c)	and the environment, the e of any name in connection use if it has been covered by (A) provided that us before you tration of your egistrants of o. 655-803" he <b>"USE</b>
on the basis of odenticide Au- egistration is idministrator, with the registrator of Course of Course of Course and Cours	f informatic ct. in no way 1 on his mot ration of a p product uply with r product ubmit a under 1 oroduct eplace hange <b>RICTIO</b> asert "a <b>DERA</b> Approving C	n furnished o be constru- ion, may at oroduct unde t is con h the for act. nd/or c FIFRA s to sub the phr 'fish an <b>DNS</b> '' s s'' betw <b>TIONS</b> official:	by the registrant, ed as an endorser ny time suspend this Act is not to ditionally r flowing ar te all data sec. 3(c)(5 mit such d ase "EPA I d Wildlife" absection of een "not" a " subsection	the above named per- ment or recommenda or cancel the registra o be construed as giv registered in nd submit on 0 or other ma 5) or FIFRA lata. File Symbol ' to "fish and of the " <b>DIRI</b> and "attractir on of the " <b>D</b>	esticide is her ation of this 1 ation of a per- king the regis accordine (1) co atterial re- sec. 4 v 655-IN I wildliff ECTIO	product by the Ag sticide in accordan trant a right to exc ance with I opy of final equired for when the A G" with "E e" in the se <b>DNS FOR I</b> he third ser	ency. In order to pro- ce with the Act. The dusive use of the nam FIFRA sec. 3 printed labe registration/ gency requir PA Registration/ CPA Registration/ USE". Itence of the <b>R USE</b> ".	e acceptance ne or to its to acceptance (c)(7)( eling to (reregis res all re- tion No ce of th	and the environment, the e of any name in connection use if it has been covered by (A) provided that us before you tration of your egistrants of o. 655-803" he <b>"USE</b>

CACHER CARACTER STORE FOR THE STORE AND A STORE OF A STORE OF

Page Two 655-803

)

)

3. Replace the fourth and fifth sentences of the "GENERAL USE CONSIDERATIONS" subsection of the "DIRECTIONS FOR USE" with the sentences shown below.

> "For this product to be effective, common carp must be trained (prebaited) to come to specific locations and feed on Prentox Prenfish Common Carp Management Bait Trainer (CCMB-T), a prebait that contains no active ingredients. Apply CCMB-T prebait by automatic fish feeder or by hand."

One reason for these changes is to make it absolutely clear that CCMB-T is the only prebait to be used.

Move the second paragraph (which, as proposed, reads "The feed retention ... levels") of the "ESTABLISHING BAIT SITES" subsection of the "DIRECTIONS FOR USE" so that the paragraph precedes the "SAMPLE BAIT STATION PLACEMENT" box. Change the paragraph being moved to read as shown below.

"Use a feed retention ring to limit the movement of floating bait (see "SAMPLE BAIT STATION PLACEMENT" diagram below). Each retention ring should surround an area of at least 0.1 acres. Center the feed retention ring on the mechanical feeder, if one is used (as shown in the diagram). Secure bait station in place by use of anchors or by mounting it on a fixed structure in the body of water. If no mechanical feeder is used, restrain the movements of the feed retention ring with at least two anchors. Allow enough slack in rope lines to accommodate the range of expected fluctuations in the water level."

- 5. In the "EXPECTED RESULTS" subsection of the "DIRECTIONS FOR USE", make the changes indicated below.
  - a. Insert "at" between "feeding" and "bait station" in the first sentence.
  - b. Change "to" to "by" in the second sentence.

3 45

Page Three 655-803

6. If, as on the proposed label, the "DIRECTIONS FOR USE" section is to begin on one label panel and end on another, appropriate cross-referencing is needed. At the bottom of the panel on which the "DIRECTIONS FOR USE" section is interrupted, use the text

"See [next, left, right, as appropriate] panel for remainder of **DIRECTIONS FOR USE**."

On the panel where the use direction resume, insert the heading

"DIRECTIONS FOR USE (continued from [last, right, left, as appropriate] panel)".

As the appropriate panel descriptions will vary with container design and label layout, the brackets indicate where you must insert the appropriate terms for the panels where the use directions are continued to and continued from.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A copy of the label stamped "Accepted with comments" is enclosed for your records.

Enclosure

)

)

F:\USER\GROBIOU\CORRESPONDENCE\Rotenone\655-ING.wpd

Prentox<sup>®</sup> Prenfish<sup>™</sup> Common Carp Management Bait EPA Registration No. 655-

# **RESTRICTED USE PESTICIDE DUE TO AQUATIC 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.

# PRENTOX<sup>®</sup> PRENFISH<sup>™</sup> COMMON CARP MANAGEMENTED

#### **ACTIVE INGREDIENTS:**

Rotenone ..... Related Compounds Piperonyl Butoxide Technical<sup>\*</sup> OTHER INGREDIENTS: TOTAL: 93.53% the Federal Insecticide, 100.00% WW the Federal Insecticide, Fungicide, rud Rodenticide Act, Fungicide, rud Rodenticide Act, Piperonyl Butoxide Technical\*

\*Equivalent to 0.4% (Butylcarbityl)(6-propylpiperonyl) ether and 0.1% related compounds. PRENTOX<sup>®</sup> -- Registered Trademark of Prentiss Incorporated PRENFISH<sup>TM</sup> - Trademark of Prentiss Incorporated

NET CONTENTS

US Patent Reg. No. 5,674,518 SNO8/426,898 Filed 10/7/97

LOT NO.

3.33%

0.50%

with COMMENTS 2.649 In EPA Letter Dated:

as arounded, for the posticidu registered under EPA Rey. No.

655-8

# **KEEP OUT OF REACH OF CHILDREN** CAUTION

FIRST AID

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. Do not induce vomiting or give anything by mouth to an unconscious person. If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

EPA REG. NO. 655-

# Manufactured by: PRENTISS INCORPORATED

EPA EST. NO. 655-GA-1

Office: Plant:

C.B. 2000, Floral Park, NY 11002-2000

Kaolin Road, Sandersville, GA 31082

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

Harmful if swallowed, absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

## **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 and application. Do not contaminate untreated water when disposing of equipment wash waters.

## **DIRECTIONS FOR USE**

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

#### USE RESTRICTIONS

Prentox Prentish Common Carp Management Bait (CCMB) is to be used to remove undesirable common carp that have been trained to eat fish food pellets and that reside in freshwater lakes, ponds and reservoirs. This product may only be used at locations, rates and times authorized and approved by the appropriate State and Federal fish and Wildlife agencies. This product is to be used only after the water body has been prepared and common carp within it have been trained to come to designated locations to feed on floating fish feed. Apply this product only within the range of rates specified in the labeling. Do not apply CCMB at times when winds and/or waves are high. Collect and property dispose of all dead fish and unconsumed or leftover bait. Do not use dead fish that were exposed to this product for feed or as food.

#### GENERAL USE CONSIDERATIONS

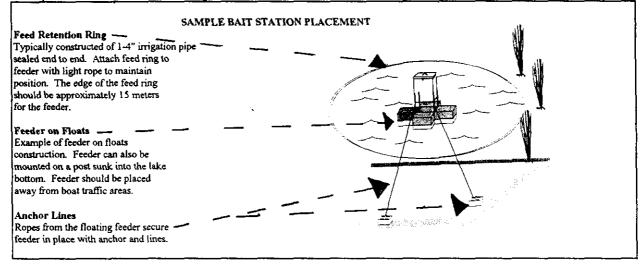
Prentox Prentish Common Carp Management Bait has been developed to provide a selective method for reducing common carp. This beit is taxic to common carp that consume it, but is not believed to be harmful to free-swimming fish that do not eat the bait. The bait is primarily made from vegetable material that is attractive to common carp, but not attractive to most game fish species. For this product to be effective, common carp must be trained (prebaited) to come to specific locations and feed on non-toxic bait. Prentox Prenfish Common Carp Management Bait Trainer (CCMB-T) is applied by automatic fish feeder or by hand. It is extremely important to make sure that use of prebait has peaked and that conditions are optimal for effectiveness of the toxic bait before it is applied. Follow-up treatments with this product tend to be far less successful than initial treatments at the same bait station locations.

Factors such as water pH, turbidity, depth, fish condition and water temperature will affect the performance of this product. This product is most effective when water temperature exceeds 80° F (about 27 C).

Prentox<sup>®</sup> Prenfish<sup>™</sup> Common Carp Management Bait EPA Registration No. 655-

#### ESTABLISHING BAIT SITES

Areas designated for baiting should be established away from shore, at or near the edge of littoral zone vegetation and away from areas where boat traffic is likely. The judgment of experienced State and Federal fisheries personnel should be employed to determine optimal locations for feeding areas in each body of water to be treated. Fish can be trained by application of 0.5-5kg per day of Common Carp Management Bait-Trainer (CCMB-T) by an automatic fish feeder or by hand. One to three weeks of training should attract any fish in the area. Test site should have a fish feed retention device placed to limit the movement of floating fish feed.



The feed retention ring around the feeder is placed to limit the movement of floating bait (see "Sample Bait Station" diagram). Each retention ring should surround an area no less than 0.1 acres. Center feed retention ring on mechanical feeder if one is used as shown in the diagram. Secure bait station in place either by use of anchors or by mounting on fixed structure in the water body. If no mechanical feeder is used, restrain the movements of the feed retention ring with at least two rope lines and anchors. Allow slack in lines to accommodate the range of expected water body water levels.

#### PREBAITING DIRECTIONS

Prior to use of this product, train common carp to eat pelleted feed by applying 2-50 lbs. (1-20kg) of Common Carp Management Bait-Trainer. Apply trainer bait twice a day, preferably at dusk and dawn - the times when common carp are likely to be feeding. One to three weeks of trainer bait applications should attract any common carp in the vicinity to the baiting area.

#### BAITING DIRECTIONS

After trainer bait is accepted consistently by common carp, apply Prentox Prentish Common Carp Management Bait in the exact same manner that the trainer bait was applied. One pellet of this product contains approximately enough rotenone to kill a 2.2 lb. (1kg) common carp, although some variation can occur.

#### EXPECTED RESULTS

It is possible to kill all the common carp feeding the bait station at one time. The number of fish killed is limited to the number of fish feeding at the feed and the number of CCMB pellets applied. Once common carp have been reduced in a given area, the bait station should be moved 200-300 meters to attract naive fish.

## STORAGE AND DISPOSAL

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

STORAGE: Store only in the original container, in a dry place inaccessible to children and pets. If spilled, sweep up and dispose of as below. After opening, only store indoors at room temperature. Do not expose to light for prolonged periods of time. 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

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.

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.