

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 6, 2001

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

Attention: Richard A. Miller

Subject Prentox® Common Carp Management Bait
EPA Reg. No. 655-803
Your amended application of April 5, 2001

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. Add the following "If in eyes" text to your label:

If in eyes •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 the National Telecommunications Network at 1-800-858-7378 immediately for treatment advice.

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.

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. Stamped label
2. Minimum Type Size Requirements for Final Printed Labeling

Letter location Disk 48,A:\Rotenone\655--803 June 2001.wpdJune 5, 2001

Pretox⁺ Prenfish[™] Common Carp Management Bait
EPA Registration No. 655-803

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.



PRENFISH[™] COMMON CARP MANAGEMENT BAIT

ACCEPTED
with COMMENTS
in EPA Letter Dated:

ACTIVE INGREDIENTS:

Rotenone	JUN 6 2001	2.64% w/w
Related Compounds		3.33%
Piperonyl Butoxide Technical*		0.50%

OTHER INGREDIENTS:

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide piperonyl ether and related compounds.

TOTAL: 93.53%
100.00% w/w

*Equivalent to 0.4% (Butylcarbityl)(6-propylpiperonyl) ether and related compounds.
PRENTOX⁺ — Registered Trademark of Prentiss Incorporated
PRENFISH[™] — Trademark of Prentiss Incorporated

655-803

NET CONTENTS _____ LOT NO. _____
 US Patent Reg. No. 5,674,518 SNO8/426,898 Filed 10/7/97
 EPA REG. NO. 655-803 EPA EST. NO. 655-GA-1

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID	
Have product container or label with you when obtaining treatment advice.	
If swallowed	<ul style="list-style-type: none"> • Call a physician, Poison Control Center, or the National Pesticide Telecommunications Network at 1-800-858-7378 immediately for treatment advice. • Drink 1 or 2 glasses of water. • Do not induce vomiting unless told to do so by a physician or poison control center. • Do not induce vomiting or give anything by mouth to an unconscious person.
If on skin	<ul style="list-style-type: none"> • Wash with plenty of soap and water for 15 minutes. • Call a physician, Poison Control Center, or the National Pesticide Telecommunications Network at 1-800-858-7378 immediately for treatment advice.
For information regarding this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Telecommunications Network at 1-800-858-7378.	

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 an 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
 Pretox Prenfish 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 properly 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.

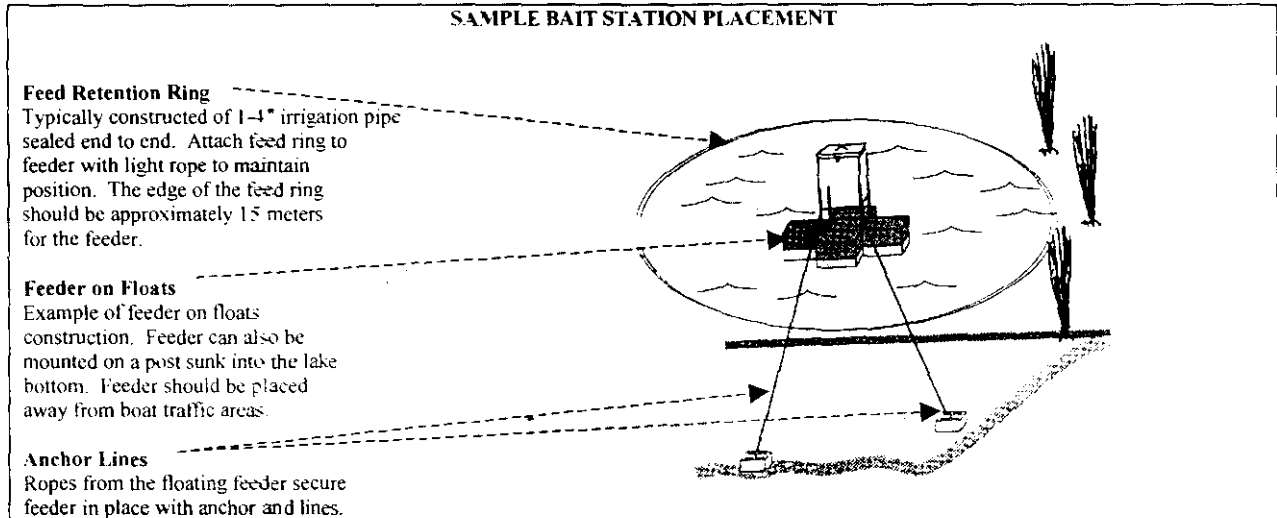
GENERAL USE CONSIDERATIONS
 Pretox Prenfish Common Carp Management Bait has been developed to provide a selective method for reducing common carp. This bait is toxic to common carp that consume it, but is not believed to be harmful to free-swimming fish that do not eat the bait. The bait is primarily made from vegetable material that is attractive to common carp, but not as 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 Pretox 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. It is extremely important to make sure that ~~use~~ consumption 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 70° F (about 21 C).

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. *Where possible, bait stations should be placed so that prevailing winds will blow the CCMB-T away from shore. This will give the carp more time to find and consume the bait.* The judgment of experienced Local, 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 1 - 11 lbs. (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.

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 - 0.2 acres (5,350-10,700 sq. ft.). 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.



PREBAITING DIRECTIONS

The goal of a prebaiting period is to have as many common carp feeding on the trainer bait as possible. 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. The amount of trainer bait applied should be increased as the number of fish feeding on the bait increases. If all or most of the trainer bait applied is consumed by common carp in 20 minutes or less, the next application of bait should be increased by 2 lbs. (1 kg.). Applicators should continue to increase the amount of trainer bait applied as long as all or most of the bait is consumed in 20 minutes. One to three weeks of trainer bait applications should attract any common carp in the vicinity to the baiting area. The applicator should closely observe feeding by the fish during the prebaiting period. The floating trainer bait will allow the applicator to determine the number and species of fish feeding on the bait.

BAITING DIRECTIONS

After trainer bait is accepted consistently by common carp, apply Prentox Prenfish Common Carp Management Bait in the exact same manner and amount as that the trainer bait was applied. *Conditions at the time of application of this product should be the same conditions as existed during the application of the trainer bait. Therefore, care must be taken to prevent or avoid additional personnel, boats, vehicles or activity in the bait station area that may disturb the fish at the time this product is applied.* One pellet of this product contains approximately enough rotenone to kill a 2.2 lb. (1kg) common carp, although some variation can occur. *The amount of CCMB applied should be equal to the amount of CCMB-T.*

EXPECTED RESULTS

It is possible to kill all the common carp feeding at the bait station at one time. The number of fish killed is limited by the number of fish feeding on the bait and the number of CCMB pellets applied. *Fish will take from 1-4 hours to die. the length of time will depend on the amount of bait consumed, temperature of the water and condition of the fish.* 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 cool, dry place inaccessible to children and pets. After opening, only store indoors at room temperature. *For prolonged storage, refrigerate at less than 50° F (10° C).* Do not expose to light for prolonged periods of time. 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 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.

Manufactured by:

PRENTISS INCORPORATED

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

Plant: Kaolin Road, Sardisville, GA 31082

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