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

April 22, 1997

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SureCo, Inc.
10012 N. Dale Mabry Hwy., Suite 221
Tampa, FL 33618

Attention: Mr. Stacy A. Schmidt

Subject: Science 1% Rotenone
EPA Registration No. 769-904
Your submissions of June 20, 1996, and January 9, 1997

We have received the above two letters and associated revised labels. Our comments follow.

A. Submission of June 20, 1996

You submitted this letter and label in response to our June 11, 1996, letter. We received this submission on January 16, 1997, and placed it in our files for this product. Since we will be stamping labeling associated with your January 9, 1997, letter, we have not reviewed or stamped the submitted labeling.

B. Submission of January 9, 1997

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. Under your product name, revise the text to read:

Dust or Spray for Vegetables, Berries, Small Fruits,
and Ornamentals. For Home Gardens Only

2. Change the ENVIRONMENTAL HAZARDS section to read:

This product is extremely toxic to fish. Do not apply directly to water. Runoff and drift from treated areas may be hazardous to aquatic organisms in adjacent sites. Do not contaminate water when disposing of equipment washwaters.

Application Directions:

AS A DUST: Apply directly from this container through the sifter top or apply with a hand duster. Apply to upper and lower leaf surfaces.

AS A SPRAY: Spray upper and lower leaf surfaces thoroughly, to the point of runoff.

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 yours,

David B. Pearson

William W. Jacobs, PhD
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

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

Peacock:A:12:A:\Rotenone\769-904.APR:703-5407/-6600:4/22/97

SCIENCE 1% ROTENONE

Dust or Spray For Flowers, Ornamentals and Vines

ACCEPTED
AND COMMENTS
in EPA Letter Dated

APR 22 1997

Active Ingredients:		
Rotenone	1.0%	
Other Cube Resins	1.6%	
Inert Ingredients:	97.4%	
TOTAL:	100.0%	769-904

EPA Reg. No. 769-904

EPA Est. No. 769-GA-1

KEEP OUT OF REACH OF CHILDREN
CAUTION/CAUCION

Si usted no entienda la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Call a physician or Poison Control Center. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

If Inhaled: Remove from exposure.

If In Eyes: Flush with plenty of water. Get medical attention.

If On Skin: Remove contaminated clothing. Wash affected area with soap and water. Launder clothes before reuse.

See Back Panel For Additional Precautionary Statements

Manufactured By:
SureCo, Inc.
Fort Valley, GA 30130

BEST AVAILABLE COPY

**PRECAUTIONARY STATEMENTS
Hazards To Humans and Domestic Animals**

CAUTION: Harmful if swallowed. May cause eye, skin, nose and throat irritation. Avoid contact with skin, eyes and clothing. Avoid inhalation of dust. Wash thoroughly after handling. Food utensils such as teaspoons and cups should not be used for food after use with pesticides.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. Store in tightly closed, original container in a locked storage area away from children and pets. Do not reuse empty container. Securely wrap closed container in several layers of newspaper and discard in trash.

DIRECTIONS FOR USE

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

Apply as soon as insects appear. Repeat applications at 5 to 10 day intervals. Be sure to over thoroughly both upper and lower surfaces of foliage as well as stems.

As A Dust: Apply directly from this container through the sifter top or apply with a dust applicator.

As A Spray: Make a paste by stirring 4 heaping tablespoons in a little water. Mix this paste with water to make a gallon of spray. When spraying, shake sprayer occasionally to maintain an effective suspension.

VEGETABLES

Asparagus, Beans, Beets (table), Broccoli, Brussels Sprouts, Cabbage, Carrots, Cauliflower, Collard, Cucumbers, Eggplant, Kale, Kohlrabi, Lettuce, Melons, Mint, Mustard greens, Okra, Peppers, Pumpkins, Radishes, Rutabagas, Squash, Swiss chard, Tomatoes, Turnips.
Controls: Aphids (except waxy cabbage aphid), asparagus beetles (twelve-spotted), Bean leaf beetle, Imported cabbage worms, Colorado potato beetles, cucumber beetles, Flea beetles, Mexican bean beetles, pepper maggots, squash vine borers, vegetable weevils.

BERRIES AND SMALL FRUITS

Blackberry, Blueberry, boysenberry, Cherry, Currant, Dewberry, Gooseberry, Grape, Loganberry, Raspberry, Strawberry

Controls: Blueberry maggots, Cherry fruitflies, Flea beetles, Gooseberry fruitworms, Imported currant worms, Japanese beetles, Raspberry cane borers, Raspberry fruitworms, Raspberry sawfly, Red-necked cane borers, Spittle bugs, Strawberry leaf beetles.

Flowers, Ornamentals, Shrubs and Vines: Use a dust or spray on flowers, ornamentals, shrubs or vines to control certain aphids, Japanese beetles, lace bugs and rose slugs.

IMPORTANT: Read these entire Directions and Conditions of Sale before using this product.
DISCLAIMER: SureCo warrants that this product conforms to the chemical description on the label and is reasonably fit for the specific purposes referred to in the Directions For Use, subject to the inherent risks referred to above. SureCo makes no other express or implied warranty of fitness or merchantability nor any other express or implied warranty. In no case shall SureCo be liable for consequential, special, or indirect damages resulting from the use, handling or application of this product.