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AUG <u>-</u> 2 1996

CERTIFIED MAIL

TIFA (C.I.) Limited c/o Technology Sciences Group Inc. 1101 17th Street, NW Suite 500 Washington D.C. 20036

Attention: Robert R. Stewart

Rotenone Resins SUBJECT: EPA Req. No. 1439-259 Your letters of July 17 and 26, 1996

We have received your revised amended registration form dated July 26, 1996, and found it acceptable.

The Agency has determined that the Confidential Statement of Formula (CSF), dated April 8, 1996, which was submitted with the above amendment in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A copy of this CSF has been placed in our file for this product. All previous versions are obsolete.

If you want to switch to another source at a later date, you must satisfy the generic data requirements that were the basis of the original suspension and request an amendment, including a revised Confidential Statement of Formula (CSF), to make the change. Once the Agency has approved that amendment, you can new use the new source.

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. Modify your ingredient statement as follows:

ACTIVE INGREDIENTS:	
Rotenone*	44.2%
Other Associated Resins	44.2%
INERT INGREDIENTS:	11.6%
TOTAL	100.0%
*Nominal concentration. See certificate of	analysis

actual rotenone content.

for

2. On the Front Panel, retain "DANGER-POISON".

3. Modify your PRACTICAL TREATMENT statement as follows:

FIRST AID

IF IN EYES: Flush with plenty of water for 15 minutes. Get medical attention if irritation persists.

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.

IF INHALED: Remove victim to fresh air. If not breathing give artificial respiration preferably mouth-to-mouth. Get medical attention.

4. Revise your "WARNING" statement as follows:

DANGER

Fatal if swallowed. Avoid inhalation of dust. Harmful if inhaled or absorbed through skin. Avoid contact with skin.

- 5. Delete the "Physical Hazards" section since this product is not a liquid, the product that you repack does not have the statement, and you do have not a history of such a hazard with this product.
- 6. Revise your "Environmental Hazards" section as follows:

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA. 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.

We are supplying a copy of this letter to Ms. Susan Jennings (703-308-8021), of our Special Review and Reregistration Division (SRRD), who prepared the basis of the original NOITS and to EPA Region 2. Any future letters about the NOITS to either RD or SRRD must include a copy to the other Division to insure good communications.

YOU CANNOT MARKET THIS PRODUCT UNTIL THE OFFICE OF COMPLIANCE HAS FORMALLY NOTIFIED YOU, IN WRITING, THAT THE AGENCY HAS LIFTED THE SUSPENSION AND ANY STOP SALE ORDERS.

If you have questions about this letter, please contact Mr. Dan Peacock at 703-305-5407.

Sincerely yours,

Karen Whitby Product Manager (14) Insecticide-Rodenticide Branch Registration Division (H7505C)

cc: 1. Susan Jennings (7508W)

2. Dr. Arian Enache EPA Region 2 Pesticides and Toxic Substances Branch 2890 Woodbridge Ave. Raritan Depot Building 10 Edison, NJ 08837-3679 Tel 908-321-4424

Peacock WP#9:A:ROTENONE\1439-236.JL3:305-5407,-6600:7/31/96

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CHEM SECT BRAND

ROTENONE RESINS

For the Formulation of Piscicides Only

ACTIVE INGREDIENTS:	
Rotenone	50%
Other Associated Resins	50%
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TOTAL	100%

KEEP OUT OF REACH OF CHILDREN

Statement of Practical Treatment

IF SWALLOWED: Do not induce vomiting. Call physician or Poison Control Center. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available drink large quantities of water. Avoid alcohol. Get medical attention. IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

EPA Reg. No. 1439-259 EPA Est. No. 1439 NJ-1

Net Contents: ____

Lot No.:_____

TIFA LIMITED TIFA SQUARE MILLINGTON, NEW JERSEY 07946 U.S.A.

(WP: L-CPR259)

ACCEPTED with COMMENTS in EPA Letter Dated

AUG - 2 1996

Under the Federal Insecticide, Fungicide, and Rodenticide Act as namended, for the posticide registered under EPM Reg. No. 1439 - 259

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

May be fatal if swallowed. May cause eye injury. Causes skin irritation. Do not get in eyes, on skin or on clothing. Wear protective goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish. Do not discharge into lakes, streams, ponds, estuaries, oceans or other public waters unless this product is specifically identified and addressed in NPDES_permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL HAZARDS

FLAMMABLE: KEEP AWAY FROM HEAT AND OPEN FLAME.

DIRECTIONS FOR USE

This product is intended for formulation only into registered, end-use products for the following acceptable use patterns: Aquatic Non-Crop: Fish

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use accordingly to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

IMPORTANT: READ BEFORE PURCHASE OR USE: WARRANTY STATEMENT:

Our recommendations for the 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.