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5-499654

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June 11, 1996

Bonide Products, Inc.
2 Wurz Ave.
Yorkville, NY 13495-1188

Attention: Ms. Anne Montalone,

Subject: Garden Rotenone Dust
EPA Registration No. 3772-32
Your amended application of October 30, 1995
Your letter of December 28, 1995

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 your ship product:

1. After "CAUTION", revise text as follows:

CAUTION: Harmful if swallowed, absorbed through the skin, or inhaled. Avoid contact with skin, eyes, or clothing. Avoid inhalation of dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash thoroughly before reuse.

2. Change "Statement of Practical Treatment" to "FIRST AID" and change the "IF SWALLOWED" and "IF ON SKIN" text as follows:

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.

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3. 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.

4. After "NIGHT CRAWLERS" add "Home Lawns Only".
5. Delete "Do not apply ... have settled."
6. Revise your "STORAGE AND DISPOSAL" statement, which should be placed after use directions, as follows:

STORAGE AND DISPOSAL

Storage: Store only in original container, in a dry place inaccessible to children and pets.

Disposal: Do not reuse empty container. Securely wrap in newspaper and discard in trash.

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,

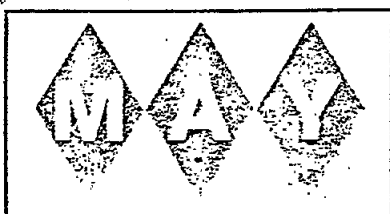


Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

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

Peacock:A:9:A:\Rotenone\3772-32.JUN:703-5407/-6600:6/11/96

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GARDEN ROTENONE DUST

For ORNAMENTALS
& Flowers

ACTIVE INGREDIENTS:

Rotenone	1.67%
Other Cube Resins	1.67%

INERT INGREDIENTS:	96.66%
Total	100.00%

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 1996

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

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

**SEE BACK PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS**

3772-32

E.P.A. Reg. No. 3772-32

E.P.A. Est. No. 4-NY-1

NET WEIGHT 3 POUNDS

Distributed by:

EARL MAY SEED & NURSERY L.P.
Shenandoah, Iowa 51603

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Avoid breathing dust. Avoid contact with skin.

ENVIRONMENTAL HAZARDS

This pesticide 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.

DIRECTIONS FOR USE

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

Do not apply this product in such a manner as to directly or through drift, expose workers or other persons. The area being treated must be vacated by unprotected persons.

Do not enter treated areas without protective clothing until sprays have dried or dusts have settled.

STORAGE: Store in original container, in a cool, dry secure area, away from fertilizer, food or feed. Keep container closed.

PRODUCT DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash.

- **CONTAINER DISPOSAL:** Do not reuse empty container. Wrap container and put in trash.

NIGHT CRAWLERS

NIGHT CRAWLERS—sometimes called red worms or fish worms—can cause considerable damage to lawns in some areas. The unsightly mounds of soil thrown up by night crawlers creates a rough uneven lawn. This condition usually occurs during early moist spring weather when night crawlers are most active near the surface.

Apply EARL MAY GARDEN ROTENONE DUST at the rate of 1 lb. to 250 square feet of lawn. Sift from shaker top can or use a small hand duster. Water the material into the ground. For best quick results make application just before a spring shower when night crawlers come to top for feeding.

PETS

Effective against fleas, lice and ticks on ponies, dogs and cats. Sift the Rotenone Dust into the hair and rub in by hand. Do not use on puppies or kittens less than 4 weeks old.

FLOWERS + ORNAMENTALS

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in interior plantscapes, ornamental gardens or parks, on golf courses or lawn and grounds.

EARL MAY GARDEN ROTENONE DUST gives good control of a wide variety of both sucking and chewing insects infesting flower gardens. Nonwooly aphids (plant lice), sawfly larvae and spittle bug.

EARL MAY GARDEN ROTENONE DUST may be used with safety on flowers^{and} ornamental plants.

Will not injure tender plant foliage.

For best results, use as a dust applied with small hand duster, or sift lightly from this shaker-type can. Dust underneath and top of foliage thoroughly. Apply to both plants and insects. Begin application when plants are well established or when new growth appears. Repeat every 7 to 10 days or as often as necessary, whether insects are present or not, to help prevent infestation. Repeat after heavy rains. Dust when air is calm.

No mixing—ready to use. Dust plants thoroughly, covering all insects to be controlled. May be used as a wet spray. Stir or mix 3 to 4 tablespoonfuls with enough water to make a paste first, then add water to make 1 gallon of spray.

NOTICE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, express or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

Packed by weight, not in volume. Product may settle in shipment.