

MAR 9 1995

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Roussel Bio Corporation
95 Chestnut Ridge Road
Montvale, NJ 07645

Attention: Ms. Christina Lawes

Subject: Rotenone Dust Insecticide
EPA Reg. No. 4816-484
Your amended application of May 9, 1994
Your Confidential Statement of Formula (CSF) of
April 17, 1973

This letter addresses two subjects: your amended application of May 9, 1994, and your Confidential Statement of Formula (CSF) of April 17, 1973.

A. Your amended application of May 9, 1994

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 to your labeling within 18 months of receipt of this letter:

1. Revise the "IF SWALLOWED" portion of your precautionary labeling statements as follows:

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

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.

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B. Your Confidential Statement of Formula (CSF) of April 17, 1973

A review of the Agency's files reveals that your product's most recent Confidential Statement of Formula (CSF) is dated **April 17, 1973**. This CSF is **unacceptable** for the following reasons:

1. According to Page 37 of the **October 1988 Rotenone Standard** (copy enclosed), registrants of Rotenone end-use products were to submit a revised CSF to EPA within **90 Days** of receipt of the standard. The Agency received no CSF as a result of this request.
2. On **March 16, 1992**, the Agency again requested that a revised CSF be submitted within **90 days** of receipt of that letter. The Agency received no CSF as a result of this request.

To date the latest CSF of record for this product is almost **22 years old**. The Agency has made requests **seven years and three years ago** to submit a revised form. Therefore, within **30 days of receipt** of this letter, you must submit a revised CSF for this product. Failure to comply with this latest request in a timely fashion will result in sending you a **Notice of Intent to Suspend** this product.

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

Sincerely yours,

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Peacock WP#5:A:ROTENONE\4816-484.ROT:305-5407,-6600:3/9/95

ROTENONE

DUST INSECTICIDE

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
CAUTION

May be harmful if swallowed, inhaled or absorbed through skin. Avoid breathing dust. Provide adequate ventilation of area being treated. Contact with skin, eyes or clothing should be avoided. Remove children, pets or fish bowls from quarters.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

EPA Reg. No. 4816-484

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Call a physician or Poison Control Center immediately.

If Inhaled: Remove victim to fresh air. Apply artificial respiration if indicated.

If On Skin: Wash affected areas with soap and water.

If In Eyes: Flush eyes with water. Call a physician if irritation persists.

See side panel for additional precautions

NET CONTENTS:

Roussel Uclaf Corporation
95 Chestnut Ridge Road
Montvale, NJ 07645

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAR 9 1995

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

4816-484

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Runoff and drift from treated areas may be hazardous to aquatic organisms in adjacent sites. Do not contaminate water when disposing of equipment washwaters.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
Pesticide Storage and Spill Procedures: Store upright at room temperature. Keep away from moisture. Sweep up and dispose of with chemical waste.

Pesticide Disposal: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

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 same manner.

Containers One Pound and Smaller: Do not reuse container. Wrap 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 a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Territory, consult the agency responsible for pesticide regulation.

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AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Waterproof gloves
- Shoes plus socks

Except as otherwise noted, applications should be made when insects first appear and be repeated as required.

Do not apply within 1 day of harvest.

Asparagus - Asparagus Beetle - Use 30 pounds per acre.

Beans - Mexican Bean Beetle - Use 30 to 40 pounds per acre. Thorough coverage of under surfaces of leaves is essential for effective control.

Beets - Flea Beetle - Use 20 to 30 pounds per acre.

Broccoli, Brussels Sprouts, Squash - Cucumber Beetles, Squash Bugs, Nymphs, Aphids - Use 25 pounds per acre. **Squash Vine Borer** - Use 30 pounds per acre. Apply thoroughly around base of plants at weekly intervals.

Eggplant - Colorado Potato Beetle, Flea Beetle - Use 30 to 40 pounds per acre.

Peas - Pea Aphid, Pea Weevil - Use 30 pounds per acre. Three applications at 7-day intervals are usually necessary for **Aphids**. For **Weevil**, make first application when peas are 50% in bloom and repeat 5 to 7 days later. On late varieties, 3 applications at 5 day intervals may be necessary.

Peppers - Aphid, Flea Beetle, Pepper Maggot - Use 20 to 25 pounds per acre. For **Maggot**, make first application when flies appear and repeat 5 days later.

Tomatoes - Flea Beetle, Colorado Potato Beetle, Aphids - Use 30 to 40 pounds per acre.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

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