



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

MAR 3 - 1994

Sharon M. Johnson
ROUSSEL UCLAP CORP.
95 CHESTNUT RIDGE RD
MONTVALE, NJ 07645

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 09/29/93 in Response to PR Notice 93-7
EPA Reg. No. 4816-697
ROTACIDE E.C.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

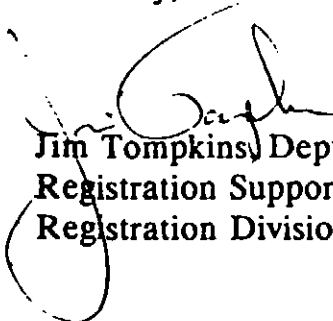
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Sharon M Johnston
ROUSSEL UCLAF CORP
95 CHESTNUT RIDGE RD
MONTVALE NJ 07645

Comment for: EPA Reg Nr.4816-697
ROTACIDE E.C.

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

The Agricultural Use Requirements section must be located in a clearly separate box on the product labeling -- with lines or other graphic indicators (such as contrasting color) to separate the section from the surrounding text.

Remove the statement "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." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

Correct the typographical errors circled on your proposed label.

ROTACIDE® EC

- Emulsifiable Rotenone at 0.4 Pounds Active Per Gallon
- For Use on Vegetables and Ornamentals (Outdoors and in Greenhouses, Plantscapes and Lath houses), Forest, Shade, Fruit and Nut Trees
- Designed Especially for the "Minor User" Crop Grower and "Organic" Farmers
- Can be Used Up to and Including Day of Harvest

ACTIVE INGREDIENTS:

Rotenone 5.00%
 Other Associated Resins 9.29%

*INERT INGREDIENTS: 85.71%
 100.00%

*Contains Xylene Range Aromatic Solvent
 Rotacide and Butacide are registered trademarks of Roussel Uclaf Corporation.

EPA REG. NO. 4816-697

EPA EST. NO. _____

KEEP OUT OF REACH OF CHILDREN WARNING ADVISO

Si usted no entiende 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.)

Poisonous if swallowed or absorbed through skin.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting. Contact a physician or Poison Control Center immediately.

FOR SKIN CONTACT: Wash immediately with soap and water.

IF IN EYES: Irrigate eyes with water. Contact a physician immediately.

NOTE TO PHYSICIAN: Gastric lavage, if ingested, followed by saline catharsis. No oils.

See Reverse Side For Additional Precautions

NET CONTENTS: _____

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Roussel Uclaf Corporation
 95 Chestnut Ridge Road
 Montvaie, NJ 07645

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS WARNING

Poisonous if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. In case of contact, wash immediately with soap and water. Do not feed treated foliage to livestock.

Personal Protective Equipment:

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category G on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves, such as Barrier Laminate or Viton
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading
- Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this products concentrate. Do not reuse them. 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.

Engineering Controls Statements:

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

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 & DISPOSAL

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

Pesticide Storage and Spill Procedures: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. 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: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved method and local procedures.

with COMMENTS
 In EPA Letter Dated

MAR 3 1994

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

4816-697

DIRECTIONS FOR USE

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

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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 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.

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 over short-sleeved shirt and short pants
- Chemical-resistant gloves, such as Barrier Laminate or Viton
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

Apply at up to 0.4 lb active ingredient per acre and repeat as required to maintain effective control. Use in sufficient water for thorough coverage of upper and lower leaf surfaces.

To be tank-mixed with BUTACIDE® 8 E.C. (or other 8 lb/gal. a.i. emulsifiable piperonyl butoxide) as recommended by your local Agricultural Extension Agent, consultant or pest control advisor, to control COLORADO POTATO BEETLES on POTATOES, EGGPLANTS and TOMATOES. Tank-mix at the rate of 1 part active Rotenone with 2 parts active Piperonyl Butoxide (76.8 fl. oz. of Rotacide® E.C. and 8.0 fl. oz. of BUTACIDE® 8 E.C.). This will provide 0.25 lb. of Rotenone and 0.5 lb. of Piperonyl Butoxide per acre.

COMBINED WITH OTHER INSECTICIDES:

May be tank-mixed with other insecticides, as recommended by your local Agricultural Extension Agent, Crop Consultant or Pest Control Advisor, to control the insects on the crops named on their labels. Observing the directions on the insecticide label, tank-mix at a rate of up to 0.4 lb A/A or Rotacide® EC (to provide 0.4 lb of active ingredient, use 1 gallon of Rotacide® EC.) Tank-mix applications should always be made in accordance with the more restrictive of label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product with label prohibitions against such mixing.

USE THROUGH IRRIGATIONS SYSTEMS (CHEMIGATION):

Refer to supplemental labeling entitled "DIRECTIONS FOR APPLICATION THROUGH IRRIGATION SYSTEMS" (available through your Roussel Uclaf distributor) for use directions for chemigation. Do not apply this product through any irrigation system unless the supplemental labeling on chemigation is followed.

NOTE: MAKE APPLICATIONS AS LATE IN THE DAY AS POSSIBLE

Rotacide® is relatively nontoxic to Honey Bees. To maximize this benefit, apply early in the morning or late in the evening.

GROWING CROPS (OUTDOORS AND IN GREENHOUSES):

ROOT AND TUBER VEGETABLES: (Including, but not limited to, Arracacha; arrowroot; arrowroot, purple; artichoke, Japanese; artichoke, Jerusalem; beet; beet, sugar; burdock, edible; carrot; cassava, bitter or sweet; celeriac (celery root); chervil, turniprooted; chicory; chufa; dasheen (taro); ginger; ginseng; horseradish; loren; parsley, turniprooted; parsnip; potato; radish; radish, Japanese (Daikon); rutabaga; salsify (Oyster plant); salsify, black; salsify, Spanish; skirret; sweet potato; tanier (cocoyam); tumeric; turnip; yam, true; yam, bean).

BULB VEGETABLES (Allium spp.): (Including, but not limited to, Garlic; leek; onion; shallot).

LEAFY VEGETABLES: (Including, but not limited to, Amaranth (leafy amaranth, Chinese Spinach, Tampala); arrugula (Rocket); celery; celtuce; chervil; corn salad; chrysanthemum, edible leaved; chrysanthemum, garland; cress, garden; cress, upland (yellow rockets, winter cress); dandelion; dock (sorrel); endive (escarole); fennel, Florence; lettuce; orach; parsley; purslane, garden; purslane, winter; rhubarb; spinach; spinach, fine (Malabar, Ceylon); spinach, New Zealand; swiss chard).

BRASSICA (cole) LEAFY VEGETABLES: (Including, but not limited to, Broccoli; broccoli, Chinese (gai lan); broccoli raab (rapini); Brussels sprouts; cabbage; cabbage, Chinese (bok choy); cabbage, Chinese mustard (gai choy); cauliflower; collards; kale; kohlrabi; mustard greens; rape greens).

LEGUME VEGETABLES: (Including, but not limited to, Beans (Phaseolus spp.) (includes adzuki beans, field beans, kidney beans, lima beans, moth beans, mung beans, navy beans, pinto beans, rice beans, runner beans, snap beans, tepary beans, urd beans, wax beans); beans (Vigna spp.) (includes asparagus beans, blackeyed peas, catjang, Chinese longbean, cowpeas, crowder peas, southern peas, yardlong beans); broad beans (fava beans) Vicia faba); chick peas (garbanzo beans); guar; jackbean (sword bean); lablab beans (hyacinth bean); lentils; peas (Pisum spp.) (includes garden peas, field peas, sugar peas); pigeon peas; soybeans).

FRUITING VEGETABLES: (Including, but not limited to, Eggplant; ground cherry (Physalis spp.); pepinos (solanum muricatum); pepper (includes bell peppers, chili peppers, cooking peppers, pimentos, sweet peppers); tomatillo; tomatoes).

CUCURBIT VEGETABLES: (Including, but not limited to, Balsam pear (bitter melon); Chinese waxgourd (Chinese preserving melon); citron melon; cucumber; gherkin; gourds, edible (Lagenaria spp., Luffa acutangula, L. cylindrica); melons, including hybrids (Cucumis melo) (including cantaloupe, casaba, crenshaw, honeydew melons, honey balls, mango melon, muskmelon, Persian melon); pumpkin (Cucurbita spp.); squash, summer (Cucurbita pepo var. melopepo); squash, winter (cucurbita maxima, C. moschata); watermelon, including hybrids (Citrullus spp.); zucchini).

CITRUS FRUITS: (Citrus spp., Fortunella spp.); (Including, but not limited to, Calamondin; citrus citron; citrus hybrids (citrus spp.) (includes chironja, tangelos, tangors); grapefruit; kumquats; lemon; limes; mandarin (tangerine); orange, sour; orange, sweet; pummelo; satsuma mandarin).

POME FRUITS: (Including, but not limited to, Apple; crabapple; loquat; pear; pear, oriental; quince).

STONE FRUITS: (Including, but not limited to, Apricot, cherry, sour, cherry, sweet; nectarine; peach; plum and prune; plum, Chickasaw; plum, Damson; plum, Japanese).

SMALL FRUITS AND BERRIES: (Including, but not limited to, Blackberry; blueberry; cranberry; currant; dewberry; elderberry; gooseberry; grape; huckleberry; loganberry; ollie berry; raspberry, black and red; strawberry; youngberry).

TREE NUTS: (Including, but not limited to, Almond; beech nut; Brazil nut, butternut; cashew; chestnut; chinquapin; filbert (hazelnut); hickory nut; macadamia nut (bush nut); pecan; walnut, black and English (persian)).

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CEREAL GRAINS: (Including, but not limited to, Barley, buckwheat; corn (sweet and field); millet; proso; oats; millet, pearl; popcorn; rice; rye; sorghum (milo); teosinte; triticale; wheat; wild rice).

GRASSES FOR SEED, FORAGE, FODDER, HAY, ETC.: (Including, but not limited to, any grass, Gramineal family, sugarcane, pasture and range grasses, grasses grown for hay and silage, Bermuda grass, blue grass, bromegrass, fescue, etc.)

NONGRASS ANIMAL FEEDS: (Including, but not limited to, Alfalfa; bean, velvet; clover; kudzu; lespedeza; lupino; sainfoin; trefoil; vetch, crown; vetch, milk).

HERBS AND SPICES: (Including, but not limited to, Anise (aniseed); balm; basil; borage; burnet; camomile; caraway; catnip; chives; daisy; coriander; costmary; cumin; curry leaf; dill; fennel (Italian and sweet); fenugreek; horehound; hyssop; marigold; marjoram, sweet (oregano); marjoram, wild; nasturtium; pennyroyal; rosemary; rue; sage; savory, summer and winter; sweet bay (bay leaf); tansy; tarragon; thyme; wintergreen; woodruff; wormwood).

ADDITIONAL CROPS: (Including, but not limited to, Asparagus, Avocado, cotton, sunflowers, safflowers).

ORNAMENTALS (Outdoors, in greenhouses, lath houses, residences, commercial and industrial and indoor landscaping) Trees (forest, shade, fruit, nut and ornamental) shrubs, bushes, vines, flowers, lawns): (Including, but not limited to, African violet, ageratum, aster, azaleas, begonia, cacti, calendula, calla, camella, camellias, carnations, ceanothus, chrysanthemum, cineraria, coleus, cyclamen, daffodils, dahlia, delphinium, foliage plants, fuchsia, gardenia, geranium, gladiolus, gloxinia, hyacinth, hydrangea, iris, ivy, lilies, maidenhair fern, marigold, narcissus, orchids, pansy, pelargonium, peony, petunia, phlox, poinsettias, pyracantha, rhododendron, roses, rubber plants, snapdragon, stock, tulip, wandering jew, zinnia and Andromeda, arborvitae, ash, azalea, beech, birch, boxwood, butternut, chamaecyparis, cherry, cotoneaster, crabapple, dogwood, Douglas fir, elm, euonymus, fir, firethorn, forsythia, hackberry, hawthorn, hemlock, hickory, holly, honey locust, horse chestnut, juniper, larch, laurel, lilac, linden, London plane, magnolia, maple, mimosa (silk tree), mountain ash, myrtle, oak, pachysandra, peach, pine, planetree, poplar, privet, quince, spruce, sycamore, taxus, tuliptree, viburnum, walnut, willow, yew).

TO CONTROL

Aphids	Fire ants	Pepper maggot
Armyworms	Flea beetles	Potato aphids
Asparagus beetles	Fleas	Potato leafhopper
Beetles	Flies	Psyllids
Black Scale	Fruit flies	Scale insects
Bugs	Grasshoppers	Silverfish
Cabbage loopers	Gypsy moth	Squash bugs
Caterpillars	Hornets	Squash vine borer
Cherry fruit flies	House flies	Thrips
Cockroaches	Imported cabbageworm	Ticks
Colorado potato beetles	Leaf hoppers	Wasps
Crickets	Leafminers	Webworms
Cucumber beetles	Lice	Weevils
Cutworms	Mexican bean beetles	Yellowjackets
Earwigs	Pea aphids	

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

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