

PM03

7401-433

12/7/99

1 of 6

December 7, 1999

CERTIFIED MAIL

Voluntary Purchasing Groups, Inc..  
c/o Brazos Associates, Inc.  
P.O. Box 703524  
Dallas, Texas 75370-3524

345 / 17 5-571542

Attention: Mr. Michael A. Jackson

Subject: 3 Way Dust Garden Insecticide  
EPA Reg. No. 7401-433 (product suspended)  
Revised Labeling and Confidential Statement of Formula  
Follow-up to March 1, 1999, Notice of Intent to Suspend  
Your letter of July 8, 1999

On March 1, 1999, the Agency sent your company a Notice of Intent to Suspend for failure to respond to the Data Call-In of October 1988. The suspension became effective in early April 1999. To comply with the DCI, you elected to delete food uses from your label and to revise your Confidential Statement of Formula (CSF) to show a supplier whose label permits the remaining uses on your label. Our review follows below.

## A. Revised Label

The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling with the following changes before you release the product for shipment:

1. Revise your "PRECAUTIONARY STATEMENTS" as follows:

## PRECAUTIONARY STATEMENTS

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS

## CAUTION

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

FIRST AID	
Have label with you when obtaining treatment advice.	
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center, doctor, or 1-800-xxx-xxxx immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center, doctor, or 1-800-xxx-xxxx immediately for treatment advice.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center, doctor, or 1-800-xxx-xxxx immediately for treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center, doctor, or 1-800-xxx-xxxx immediately for treatment advice.</li> </ul>

2. Delete the sentence, "Avoid storage near steam pipes and radiators." from the "Physical or Chemical Hazards" section. Modify your "Storage" section as follows:

**Storage:** Store only in original container in a cool, dry place inaccessible to children and pets and away from steam pipes and radiators.

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions. **However, you may not ship this product until you have received formal, written notice that the Agency has 1) lifted the suspension for this product and 2) lifted any stop sales (if any were imposed).**

A stamped copy of the labeling is enclosed for your records.

B. Revised CSF

1. The Agency has determined that the Confidential Statement of Formula (CSF), dated July 8, 1999, which was submitted 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 have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or [peacock.dan@epa.gov](mailto:peacock.dan@epa.gov) (by E-Mail).

Sincerely,

Daniel B. Peacock, Biologist  
Insecticide-Rodenticide Branch  
Registration Division (7504C)

Enclosures: 1. Stamped Label  
2. Minimum Type Sizes for Final Printed Labels

cc: Diane Isbell (SRRD, 7508C)

C:\Rotenone\7401-433 Revised label & CSF.wpd

[FRONT LABEL PANEL]

# 3 WAY DUST GARDEN INSECTICIDE

- Controls Beetles, Rose Slugs & Certain other Pests on Flowers & Ornamentals
- Ideal for Use on Roses
- Ready to Use

**Active Ingredients:**

Sulfur ..... 10.00%

Rotenone ..... 1.00%

Other Cube Resins ..... 1.50%

Inert Ingredients: ..... 87.50%

Total: ..... 100.00%

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

DEC 7 1999  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
7401-433

See Back/Side Panel for additional precautionary statements

NET WEIGHT \_\_\_\_\_ lbs.

[BACK/SIDE LABEL PANEL]

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### 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.

#### STATEMENT OF PRACTICAL TREATMENT

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

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

If in Eyes: Flush eyes with plenty of water. Call a Physician if irritation persists.

If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

#### ENVIRONMENTAL HAZARDS

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.

#### PHYSICAL OR CHEMICAL HAZARDS

Keep this package away from excessive heat. Avoid storage near steam pipes and radiators.

#### DIRECTIONS FOR USE

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

#### HOME ORNAMENTAL

Use Restrictions: For Home Ornamentals Only.

**[BACK/SIDE LABEL PANEL]****FLOWERS & ORNAMENTALS**

**USE ON FLOWERS & ORNAMENTALS INCLUDING:** Aster, Carnations, Geraniums, Gladiolus, Nasturtium, Sweet Alyssum, Mignonette, Chrysanthemums, Dahlias, Peonies, Petunias, Primrose, Roses, Sweet Peas, Phlox, Delphiniums, Marigolds, Zinnias.

**CONTROLS:** Aster Beetle, Cabbage Looper, Imported Cabbageworm, Rose Chafer, Rose Slug, Flea Beetles, Cucumber Beetles (Diabrotical), Aphids (Green & Rosy) and Adult Japanese Beetle.

**APPLICATION DIRECTIONS**

At first appearance of pests or its damage, dust lightly, directly from this container through the sifter top or apply with a hand duster. Apply to upper and lower leaf surfaces. Repeat at 7 to 10 day intervals or until pests are under control.

**STORAGE & DISPOSAL**

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

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

**VOLUNTARY PURCHASING GROUPS, INC**  
BOX 460  
BONHAM, TEXAS 75418

EPA Registration No. 7401-433

EPA Establishment No. 7401-TX-1

Rev 3/12/99