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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 26 1991

5406643 300

Ms. Barbara Brown  
Drexel Chemical Company  
2487 Pennsylvania Street  
Memphis, TN 38109

Dear Ms. Brown:

Subject: Pearson's 5% Rotencne WP  
EPA Registration No. 19713-316  
Your Letter Dated October 24, 1991

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:

1. Make the labeling changes listed below before you release the product for shipment bearing the revised labeling:
  - a. On the front panel of the label add the Net Contents.
  - b. As discussed on the phone, since this product is not to be used in streams, remove the word streams from USE RESTRICTIONS so the sentence reads :  

**Use against fish in lakes and ponds.**
  - c. Under the section Total Amount of Product Needed for Treatment you are to list either gallons or pounds not "specify gallons or pounds" as it is now written.
  - d. Under the section General Guide to the Application Rates ... Ponds add the footnote as stated on the label format:

<sup>1</sup>Adapted from Kinney, Edward. 1965. Rotenone in Fish Pond Management. USDI. Washington, D.C. Leaflet FL-576.

MADDEN Dick 1/11/25/11 Also under this section remove information from the table in regards to Pre-impoundment Treatment

ABOVE DAM - CONCURRENCES

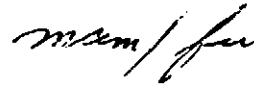
SYMBOL							
SURNAME							
DATE							

- e. Change heading **DETERMINATION OF ACRE FEED** to **DETERMINATION OF ACRE FEET**.
  - f. Under section **RESTOCKING AFTER TREATMENT**, in the last sentence correct spelling of "alived" to **alive**.
  - g. Under section **STORAGE INSTRUCTIONS**, number 2, change the word "herbicide" to **piscicide**.
2. Submit a copy of your final printed labeling before you release the product for shipment.

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 constitutes acceptance of these conditions.

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

Sincerely yours,



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

**RESTRICTED USE PESTICIDE**  
Due to Aquatic Toxicity  
For retail sale to, and use only by, Certified  
Applicators or persons under their direct  
supervision and only for those uses covered by  
the Certified Applicator's certification.

Southland Pearson's & Company  
5% Rotenone W.P.

**ACTIVE INGREDIENTS**

Rotenone . . . . . 5%  
Other Associated Resins. . . . . 10%

**INERT INGREDIENTS.** . . . . . 85%

**TOTAL** . . . . . 100%

**ACCEPTED**  
with **COMMENTS**  
In EPA Letter Dated:

**NOV 26 1991**

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

19713-316

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

**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:** 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 IN EYES:** Immediately flush eyes with plenty of water for  
at least 15 minutes and get medical attention.

**IF ON SKIN:** Wash with plenty of soap and water. Get medical  
attention if irritation persists.

**ENVIRONMENTAL HAZARDS**

This pesticide is extremely toxic to fish. Fish kills are  
expected at recommended rates. Consult your State Fish and  
Game Agency before applying this product to public waters to  
determine if a permit is needed for such an application. Do  
not contaminate untreated water when disposing of equipment  
washwaters

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use, pour, spill or store near heat or open flame

EPA REG. NO. 19713-316  
EPA EST. NO.

*Not Contact*

#### DIRECTIONS FOR USE

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

#### USE RESTRICTIONS

Use against fish in lakes, ponds, and streams (immediately above lakes and ponds).

Since such factors as pH, temperature, depth, and turbidity will change effectiveness, use this product only at locations, rates, and times authorized and approved by appropriate state and Federal fish and wildlife agencies. Rates must be within the range specified in the labeling.

Properly dispose of dead fish and unused product. Do not use dead fish as food or feed.

Do not use treated with rotenone to irrigate crops or release within 1/2 mile upstream of a potable water or irrigation water intake in a standing body of water such as lake, pond, or reservoir.

#### APPLICATION DIRECTIONS

##### Application Rates and Concentrations of Roterone

The actual application rates and concentrations of rotenone needed to control fish will vary widely, depending on the type of use (e.g., selective treatment, normal pond treatment, etc.) and the factors listed above. The table below is a general guide for the proper rates and concentrations.

##### Total Amount of Product Needed for Treatment

To determine the total number of (specify gallons or pounds) needed for treatment, divide the number of acre-feet covered by one (specify gallon or pound) for a specific type of use (e.g., selective treatment, etc.), as indicated in the table below. into the number of acre-feed in the body of water.

##### General Guide to the Application Rates and Concentrations of Rotenone Needed to Control Fish in Lakes and Ponds

Type of Use	Number of Acre-Feet	Parts Per Million
	Covered by One Pound	5% Rotenone
Selective Treatment	3.7 to 2.8	0.10 - 0.13
Normal Pond Use	0.74 to 0.37	0.5 - 1.0
Remove Bullhead or Carp	.37 to .185	1.0 - 2.0
Remove Bullhead or Carp in Rich Organic Ponds	.185 to 0.093	2.0 <sup>1</sup> - 4.0
Pre-impoundment Treatment above Dam	.123 to 0.074	3.0 - 5.0

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### **FISH POND RENOVATION**

Rotenone is required for use by, or under permit from, appropriate State and Federal Fish and Wildlife Agencies.

### **DETERMINATION OF ACRE FOOT**

The term "acre foot" designates a unit of volume having an area of one acre and a depth of one foot. Make a series of transects across the water to be treated and sound with a weighted line or a pole measured in inches and feet. Add the sounding measurements and divide by the number of soundings to determine the average depth. Multiply the average depth by the total surface area, which can be determined from an aerial photograph or plat drawn to scale.

### **APPLICATION OF ROTENONE**

Treatment of ponds should be made in late September or early October. Apply 1 1/3 pounds of Pearson's 5% Rotenone W.P. to each acre foot of water. Place proper amounts in a burlap bag and trail behind an outboard motor boat; make sure a sufficient number of passes across the pond to insure complete mixing. When treating deep ponds, weight the bag and tow at the desired depth. Knead the bag frequently. If the pond contains catfish, green sunfish, golden shiners, suckers warmouth and other hard-to-kill fish, use 3 pounds of Pearson's 5% Rotenone W.P. to each acre foot of water. If the pond has been drained, this product should be mixed with water until a thin mixture is obtained, then applied with a dipper or small container to all potholes and water surface within the pond and mix with an outboard motor if possible.

### **RESTOCKING AFTER TREATMENT**

Wait 2 to 4 weeks after treatment of pond. After this time has elapsed, place a sample of desired fish to be stocked into wire cages in the coolest part of the treated pond. If these fish are still alive after 24 hours, the pond may be restocked.

### **RE-ENTRY STATEMENT**

Do not allow swimming in rotenone-treated water until the application has been completed and all pesticide has been thoroughly mixed into the water according to labeling instructions.

**STORAGE AND DISPOSAL**

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

**STORAGE INSTRUCTIONS**

Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from any heat or ignition source. Avoid storage in high temperatures. Do not stack over 2 pallets high. Move bags carefully as not to tear or puncture. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Do not allow bags to become wet or store in a damp, humid area. Keep away from any puncture source. Avoid storage near water supplies, food, feed, and fertilizer to avoid contamination. Store in original containers only. If the contents are leaking or material is spilled, follow these steps:

1. Collect and place in suitable containers for disposal
2. Wash area with water and soap to remove remaining herbicide.
3. Follow washing with clean water rinse.
4. Do not allow runoff to enter sewer or contaminate water supplies.
5. Dispose of waste as indicated below:

**PESTICIDE DISPOSAL**

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL**

Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.