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Systems Integration Group, Inc.

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**CERTIFIED MAIL**

**MAY 18 1999**

Ms. Luz G. Piwonka  
Drexel Chemical Company  
1700 Channel Avenue  
Memphis, TN 38113

Subject: Drexel 5% Rotenone Wettable Powder  
EPA Registration No. 19713-316  
Your submission of March 26, 1999

Dear Ms. Piwonka:

With your above submission, you provided us with revised labeling for your product. At this time, we are approving your label. However, you must be aware that the source of your active ingredient is pending cancellation. Therefore, within 30 days of receipt of this letter, you will need to request voluntary cancellation of the product or to submit a revised Confidential Statement of Formula (CSF) with an acceptable source. The simplest approach is to repack a 7.4% manufacturing use powder. If this is acceptable, you would need to modify the ingredient statement on your label.

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 of final printed labeling before you ship your product. Refer to the enclosure for final printed labeling instructions.

1. Correct the spelling of the signal word "VENINO" to "VENENO".
2. Add "If burned, stay out of smoke" to your Contained Disposal statement.

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.

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A copy of the label stamped "Accepted with Comments" is enclosed for your records.

If you have questions about this letter, you may reach Grace M. Robiou at (703) 305-1016.

Sincerely,

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

Enclosure

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Working Copy 3044  
(packet)

# 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.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

MAY 18 1993

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

19713-316



# 5% Rotenone

Wettable Powder

### ACTIVE INGREDIENTS:

Rotenone .....	5.0%
Other Associated Resins .....	10.0%
OTHER INGREDIENTS: .....	85.0%
TOTAL: .....	100.0%

### 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, reservoirs and streams immediately above lakes, ponds and reservoirs.

This product is registered for use by or under permit from and after consultation with State and Federal Fish and Wildlife Agencies.

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 water treated with this rotenone to irrigate crops or release within 1/2 mile upstream of a potable water or irrigation intake in a standing body of water such as lakes, ponds or reservoirs.

### APPLICATION DIRECTIONS

**Application Rates and Concentrations of This Product**  
The actual application rates and concentrations of this product 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 pounds needed for treatment, divide the number of acre-feet covered by one pound for a specific type of use (e.g., selective treatment, etc.), as indicated in the table below, into the number of acre-feet in the body of water.

### General Guide to the Application Rates and Concentrations of This Product Needed to Control Fish in Lakes and Ponds\*

Type of Use	Number of Acre-Feet Covered by (1) One Pound	Parts per Million of This Product
Selective Treatment	3.7 to 2.8	0.1 to 0.13
Normal Pond Use	0.74 to 0.37	0.5 to 1.0
Remove Bullhead or Carp	.37 to .185	1.0 to 2.0
Remove Bullhead or Carp in Rich Organic Ponds	.185 to 0.093	2.0 to 4.0

\*Adapted from Kinney, Edward. 1965. *Rotenone in Fish Pond Management*. USDI. Washington, D.C. Leaflet FL-576.

KEEP OUT OF REACH OF CHILDREN

DANGER  
POISON



PELIGRO  
VENENO VENENO

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.)

See FIRST AID Below

EPA Reg. No. 19713-316

EPA Est. No.

Net Contents: \_\_\_\_\_

### FIRST AID

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

**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:** 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.

### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

**DANGER:** Fatal if inhaled or swallowed. Harmful if absorbed through the skin. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not breath dust.

Use a dust filtering respirator (MSHA/NIOSH approval number TC-21C) or a NIOSH approved respirator with any R, P or HE filter.

Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse.

### 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 AND CHEMICAL HAZARDS

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

As compared to 452-829



Manufactured By:  
**Drexel Chemical Company**

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972

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**DETERMINATION OF ACRE FEET**

The term "acre feet" 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.

**APPLICATIONS OF THIS PRODUCT**

Treatment of ponds should be made in late September or early October. Apply 1½ pounds of this product 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 ensure completing 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 this product 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 mixed with an outboard motor if possible.

**RE STOCKING 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.

**REENTRY STATEMENT**

Do not allow swimming in water treated with this product 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 and disposal.

**PESTICIDE STORAGE:** Storage should be under lock and key and secure from access by unauthorized persons or 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 container 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 soap and water to remove remaining pesticide.
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:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:**

Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration if allowed by State and Local authorities. *If burned stay out of smoke*

OK

**WARRANTY—CONDITION OF SALE**

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the Seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith. In no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

