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Platte Chemical Co.
419 18th Street
Greeley, CO 80631-5852

Attention: Mr. William Mahburg

Subject: 1% Rotenone Dust
EPA Reg. No. 34704-759
Your letter of May 12, 1995
Our letter of May 2, 1995

We have received a copy of the administrative record for the above product that was missing from the Agency's files. We appreciate the effort in filling this request. Our records are now complete.

Based on the record provided us, the Agency's last accepted label for this product was March 21, 1973, 22 years ago. On August 31, 1989, Platte Chemical Co. submitted a label in response to the 1988 Rotenone Standard. Since the Agency never reviewed this submission, we have reviewed it now in light of current requirements.

We have reviewed this labeling on the assumption that you are only interested in the "home garden" market. We based our assumption on the texts of the previously submitted labeling and the absence of labeling submitted in response to the Worker Protection Standard (WPS) and PR Notices 93-7 and 93-11. If you want a second label for "commercial" use, submit three (3) copies of draft label that conforms the WPS labeling requirements. Once approved, you could sell in both the "home garden" and "commercial markets."

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, with 18 months of receipt of this letter, you:

1. On the Front Panel, add the word "Home" before "Gardens".
2. The current registration number is "34704-759".
3. Since this product is for "home gardens", you may delete the second paragraph under "CAUTION".

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4. Modify your Environmental Hazards statement as follows:

This pesticide is extremely toxic to fish. Do not apply directly to water. Runoff from treated areas may be hazardous to aquatic organisms in adjacent sites. Do not contaminate water when disposing of equipment washwaters.

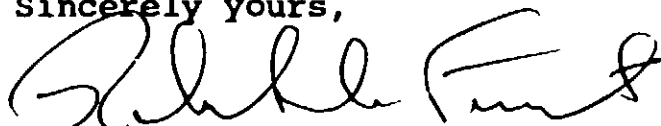
5. In your use directions, change "at the rate of 20 to 50 lbs. per acre" to "thoroughly".

6. As indicated on Page 7 of PR Notice 93-3, the maximum net weight is "40 lbs."

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.

If you have questions about this letter, please contact Mr. Dan Peacock at 703-305-5407. A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



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

Enclosures: 1. Stamped label
2. A-79 Enclosure

Peacock WP#6:A:Rotenone\34704A.759:305-5407,-6600:06/C5/95



1% ROTENONE DUST

A GENERAL PURPOSE INSECTICIDAL DUST FOR GARDENS

ACTIVE INGREDIENTS:

Rotenone..... 1.0%

Other Associated Resins 2.0%

INERT INGREDIENTS 97.0%

TOTAL 100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

ACCEPTED

With COMMENTS
EPA Letter-Dated

JUN 6 1995 EPA REG. NO. 34704-564

EPA EST. NO. _____

NET WEIGHT 50 LBS.

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

34704-759

EXP-1Y

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed or inhaled. Avoid breathing dust. Avoid contact with skin, eyes or clothing. In case of contact, immediately flush eyes and skin with plenty of water. Get medical attention if irritation persists.

Do not apply rotenone in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons. Do not enter treated areas without protective clothing until dust has settled.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish. Do not apply directly to water or wetlands (swamps, bogs, marshes, potholes). Runoff and drift from treated areas may be hazardous to aquatic organisms in adjacent sites. Do not contaminate water when disposing of equipment washwaters. Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. Induce vomiting by giving victim 1 or 2 glasses of water and touching the back of throat with finger. Never give anything by mouth to an unconscious person.

IF IN EYES: Flush with plenty of water. If irritation persists get medical attention.

IF ON SKIN: Wash immediately with plenty of soap and water.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

STORAGE: Store in original container only, preferably in a locked area. Store in a cool, dry place. Reduce stacking height where local conditions, such as humidity or pallet overhang, can affect package strength.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Waste 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.

ON VEGETABLES

Asparagus, Beans, Beets, Broccoli, Brussel Sprouts, Cabbage, Cauliflower, Cucumbers, Melons (Watermelon and Cantaloupe), Peas, Potatoes, Squash and Tomatoes: For the control of asparagus beetle, Mexican bean beetle, Colorado potato beetle, flea beetles, spotted cucumber beetles, striped cucumber beetle and aphids.

Dust when insects first appear and repeat applications as often as is necessary for control. Always repeat dusting after a rain.

Dust should be applied at the rate of 20 to 50 lbs. per acre, depending on the size of plants and density of the foliage. For best results use a dust gun, taking care to see that the foliage, both upper and lower sides, are dusted. Do not apply within 1 day of harvest.

NOTICE

Platte warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. It is impossible to eliminate all risks inherently associated with the use of the product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Platte. In no case shall Platte be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the buyer. Platte makes no warranties of Merchantability or fitness for a particular purpose nor any other express or implied warranty except as stated above.

FORMULATED FOR
PLATTE CHEMICAL CO.
150 SO. MAIN STREET
FREMONT, NEBRASKA 68025