

83851-8

3/4/2010

1/17



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

MAR 04 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Ross Gilbert
AmTide LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Label Notification Revising the Container Disposal Instructions

Dear Mr. Gilbert:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated February 17, 2010 for:

EPA Registration 83851-8

AmTide Imidacloprid 75% WDG Termiticide

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

Dani Daniel
Registration Division (7505P)
Insecticide/Rodenticide Branch

NOTIFICATION

2/17



United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83851-8	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) AmTide, LLC / AmTide Imidacloprid 75% WDG Termiticide	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) AmTide LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Aluminum film bag
* Certification must be submitted If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt No. per container	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 lb., 2 lb., 5 lb.	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ross Gilbert	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Cat# Application Received (Stamped) _____ _____ _____ _____
2. Signature 	3. Title Agent	
4. Typed Name Ross Gilbert	5. Date 2/17/2010	

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

3/17

February 17, 2010

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: AmTide LLC – AmTide Imidacloprid 75% WDG Termiticide (EPA Reg. No. 83851-8)
Revision to Container Disposal Instructions per PRN 2007-4

Dear Ms. Eagle,

On behalf of AmTide, LLC please find the enclosed label notification revising the container disposal instructions per PRN 2007-4.

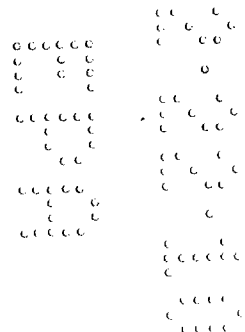
In support of this notification submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1).
2. One (1) copy of the AmTide Imidacloprid 75% WDG Termiticide labeling with changes tracked.
3. One (1) copy of the AmTide Imidacloprid 75% WDG Termiticide labeling with changes incorporated.
4. Certification with respect to label integrity.
5. Letter of Authorization.
6. One (1) copy of the AmTide Imidacloprid 75% WDG Termiticide labeling on CD.

Please feel free to contact me by phone (253) 853-7369 or by email at Ross@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

Ross Gilbert



Enclosures

cc: D. Wang; AmTide, LLC

2/17

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
83851-8	February 17, 2010	083851-00008.20100217.PRN 2007-4 lbl notification.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature 

Date 2/17/2010

Ross Gilbert

Name (typed) _____

Agent

Title _____

NOTIFICATION¹

MAR 04 2010

5/17

AmTide Imidacloprid 75% WDG Termiticide

For use only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites and carpenter ants.

ACTIVE INGREDIENT:

Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine 75.0%

OTHER INGREDIENTS: 25.0%

TOTAL: 100.0%

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you).

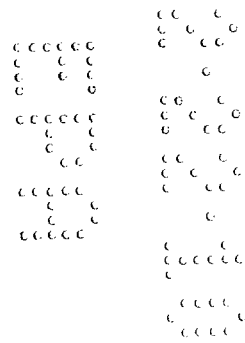
FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Chemtrec at 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

EPA Reg. No. 83851-8

EPA Est. No.

Manufactured for:

AmTide LLC
21 Hubble
Irvine, CA 92618



Net Weight:

6/17

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children or pets away from treated area until dry.

PERSONAL PROTECTIVE EQUIPMENT

Pesticide handlers (mixers, loaders, and applicators) must wear long-sleeved shirt and long pants, socks, shoes, and waterproof gloves. After the product is diluted in accordance with label directions for use, shirt, pants, socks, shoes and waterproof gloves are sufficient. In addition; all pesticide handlers must wear protective eyewear when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injections.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen, or in any conditions where run-off or movement from the treatment area (site) is likely to occur.

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, etc. due to the possibility of electric shock.

DIRECTIONS FOR USE

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

APPLICATION DIRECTIONS FOR CONTROL OF SUBTERRANEAN TERMITES

Information

AmTide Imidacloprid 75% WDG Termiticide contains the active ingredient, imidacloprid, which is effective in preventing and controlling subterranean termite (*Coptotermes*, *Heterotermes* and *Reticulitermes*) infestations in and around structures and other items. Applied as a dilute solution, AmTide Imidacloprid 75% WDG Termiticide works by creating a continuous chemically-treated zone (horizontal and/or vertical as appropriate to the site) between the wood or other cellulose material in a structure and the termite colonies in the soil. Creation of this chemically-treated zone between the wood in the structure and the termites in the soil requires that the solution of AmTide Imidacloprid 75% WDG Termiticide be adequately dispersed in the soil.

The service technician must be knowledgeable in the current control practices to prevent or control subterranean termites with this product and be able to select the appropriate method to use (such as trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment).

7/17

Mechanical alteration of the structure may be required. It is recommended that leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components be eliminated. Termite foraging will be reduced if nonessential cellulose containing materials that are in contact with the ground under or around the structure are removed.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. Additional information about the current control practices in specific localities can be obtained from structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Restrictions

Do not contaminate cisterns or wells.

Do not treat soil that is saturated with water or is frozen.

Do not treat outdoors when it is raining.

Do not contaminate water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply.

Do not apply solution to soils, areas or sites if conditions exist that would allow runoff or movement of the solution from the treated area or site. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Do not apply solution until location of heat pipes, ducts, water and sewer lines and electrical conduits are known and identified. Caution must be taken to avoid puncturing and injection into these structural elements.

This product may not be applied to soils where edible plants may be planted. If soils have been treated with AmTide Imidacloprid 75% WDG Termiticide, do not plant edible plants in treated soils.

Use Rates

AmTide Imidacloprid 75% WDG Termiticide may be used to prevent or control subterranean termites at rates ranging from a 0.05% solution in water--for typical control situations--to a 0.10% solution in water for severe or persistent infestations. Under certain situations AmTide Imidacloprid 75% WDG Termiticide may be mixed in reduced volumes of water. For example, if soils cannot absorb the higher volumes, apply using the 0.10% concentration (see "Adjustments to Application Volume", below).

Application Volume

For optimum control and prevention of termite infestation, apply AmTide Imidacloprid 75% WDG Termiticide in the specified volume of finished water solution and the specified AmTide Imidacloprid 75% WDG Termiticide concentration as provided below or as directed in other sections of this label:

Horizontal Barrier Rate: Apply a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Vertical Barrier Rate: Apply a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume: Reduced volumes may be used, for example if the soil will not accept the labeled application volumes, but there must be a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: If the application volume is reduced significantly, a continuous barrier may not be achieved. As long as the volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved, these reduced volumes are permitted. To ensure a

8/17

continuous barrier under reduced volume applications, reduce the spacing between the holes created for sub-slab injection and soil rodding to account for any decrease in dispersion of the solution in the soil.

Example for horizontal barriers: instead of using 1 gallon of solution, use a range of between 0.5 to 2 gallons of solution applied to deliver a horizontal barrier of 10 square feet but maintain the same amount of AmTide Imidacloprid 75% WDG Termiticide applied per 10 square feet.

Example for vertical barriers: instead of using 4 gallons of solution, use a range of between 2 and 8 gallons of solution applied to deliver a vertical barrier 10 feet long by one foot deep but maintain the same amount of AmTide Imidacloprid 75% WDG Termiticide applied per 10 linear feet.

Calculating an Amount of AmTide Imidacloprid 75% WDG Termiticide to Mix

To prepare 25, 50 or 100 gallons of finished spray solutions, use the "Mixing Directions Table" below to determine how much AmTide Imidacloprid 75% WDG Termiticide to use to prepare a 0.05% or 0.10% spray concentration.

To prepare spray solutions of any other finished spray volume, use the following equations to determine the amount of AmTide Imidacloprid 75% WDG Termiticide required for a 0.05% or 0.10% spray concentration, respectively:

Where A = Gallons of water of finished solution (convert partial gallons (such as ½) to decimal (such as 0.5)):

For a 0.05% concentration: $A \times 0.09 =$ number of ounces AmTide Imidacloprid 75% WDG Termiticide to add to A gallons [for number of ounces AmTide Imidacloprid 75% WDG Termiticide multiply the number of ounces by 28.4]

For a 0.10% concentration: $A \times 0.18 =$ number of ounces AmTide Imidacloprid 75% WDG Termiticide to add to A gallons [for number of ounces AmTide Imidacloprid 75% WDG Termiticide multiply the number of ounces by 28.4].

Mixing Directions Table for AmTide Imidacloprid 75% WDG Termiticide

Desired solution concentration:	Amount of AmTide Imidacloprid 75% WDG Termiticide required to make		
	25 gallons finished solution	50 gallons finished solution	100 gallons finished solution
0.5% concentrate	2.25 oz. (64 grams)	4.50 oz. (128 grams)	9.00 oz. (255 grams)
0.1% concentrate	4.50 oz. (128 grams)	9.00 oz. (255 grams)	18.00 oz. (511 grams)

Preparation of AmTide Imidacloprid 75% WDG Termiticide Solutions

AmTide Imidacloprid 75% WDG Termiticide use rates are expressed as the percentage (%) concentration it forms when mixed in water. Use the "Mixing Directions Table for AmTide Imidacloprid 75% WDG Termiticide" to determine the amount of AmTide Imidacloprid 75% WDG Termiticide to add to either 25, 50 or 100 gallons of water. If the desired finished gallon solution is different, refer to the section on "Calculating an Amount of AmTide Imidacloprid 75% WDG Termiticide".

Mix the AmTide Imidacloprid 75% WDG Termiticide use dilution in the following manner:

1. Fill tank ¼ to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of AmTide Imidacloprid 75% WDG Termiticide
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

9/17

PRE-CONSTRUCTION TREATMENT

Use or Use Site	Directions and Restrictions
All Structures	<p>Do not apply at a lower dosage and/or concentration than is specified on this label for application before installation of the finished grade.</p> <p>Before each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.</p>
Concrete Slab-on-ground or Basements	<p>Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab. This includes areas that will be under carports, porches, basement floor and entrance platforms. Apply solution uniformly at the Horizontal Barrier Rate. If the fill under slab is gravel or other coarse materials, apply at the rate of 1.5 gallons per 10 square feet or in a sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, treat these areas at the Vertical Barrier Rate.</p> <p>After grading is complete, make an application using the Vertical Barrier Rate by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced 12 or fewer inches apart or in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (do not exceed 25 p.s.i. at the treatment tool when the valve is open) to treat soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed back into the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.</p> <p>When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better opportunity to achieve a continuous chemical treated zone than using soil rodding alone to establish a vertical treated zone.</p>
Crawl Spaces	<p>Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution in with soil as it is being placed in the trench.</p>
Hollow Block Foundations or Voids	<p>Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined by the applicator for conditions that may cause runoff or application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.</p>

9/17

POST-CONSTRUCTION TERMITICIDE TREATMENT

Use or Use Site	Directions and Restrictions
<p>All Structures to be Treated</p>	<p>Do not make any application until all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts have been identified and located. Use caution to avoid puncturing these elements and/or injecting solution into them. All drilled holes in commonly occupied areas into which solution has been applied must be plugged. Plugs must be made of a non-cellulose material or covered by an impervious, non-cellulose material.</p> <p>Vertical Barrier Depth: After the final grade is installed, the applicator must trench and rod into the trench, or trench along the foundation walls and around pillars and other foundation elements, and treat at the labeled rate from the grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench, or trench along the foundation walls, and treat at the labeled rate to a minimum depth of four feet. The actual depth of treatment will depend on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Do not treat a structure below the footing.</p>
<p>Structures Containing Concrete Slabs on Ground with Monolithic/Floating/Supported Slabs (includes Basements)</p>	<p>For application beneath existing slabs, it may be necessary to drill holes in the slab or the adjacent foundation and then apply the solution. Make sure that the holes are spaced so that when the solution is applied into the holes, a continuous treated zone is achieved beneath the slab.</p> <p>Treat all existing cracks and cold, construction or expansion joints, and any bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution per 10 linear feet per foot of depth to provide a uniform treated zone.</p> <p>Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Horizontal Barrier Rate (refer to the "Application Volume" section of this label) beneath slabs by either drilling and long-rodging from the exterior or by grid pattern drilling and injection vertically through the slab. Long-rodging should be used only when grid pattern drilling and injection and horizontal short-rodging and injection cannot be used to deliver the sub slab treatment.</p> <p>Vertical Barriers Along Interior of Foundation Walls: Vertical barriers on the interior side of foundation walls may be established by sub-slab injection of the solution at the Vertical Barrier Rate (refer to the "Application Volume" section of this label). Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Space the drill holes no farther apart than 12 inches so that a continuous chemical barrier is achieved. Use caution to ensure that the solution is evenly distributed. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, along one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.</p> <p>Vertical Barriers Along Outside of Foundation Walls: Trench and rod into the trench, or trench along the outside of foundation walls, and treat at the Vertical Barrier Rate to the depth specified under the section above, Vertical Barrier Depth. If physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.</p> <p>Bath Traps: Treat exposed soil beneath and around areas where plumbing and utility services penetrate the slab at the rate of 3 gallons of solution per square foot of soil.</p>
<p>Structures Containing Accessible Crawl Spaces</p>	<p>For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a</p>

11/17

	<p>depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.</p> <ol style="list-style-type: none"> 1. Do not allow the rod holes and trenches to extend below the bottom of the footing. 2. Rod holes must be spaced close enough to achieve a continuous termiticide barrier but in no case may the holes be more than 12 inches apart. 3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent runoff of the termiticide. While re-filling the trench with treated soil, mix the solution in with the soil. 4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until the application has been completed and all termiticide solution has been absorbed by the soil. <p>Application of an overall treatment of the crawl space soil surface at the "Horizontal Barrier Rate" (0.05% to 0.10% solution of AmTide Imidacloprid 75% WDG Termiticide) will prevent subterranean termites from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members.</p> <p>If crawl spaces are infested with swarming and exposed worker termites, apply AmTide Imidacloprid 75% WDG Termiticide as a general fan spray directly to termites at the "Horizontal Barrier Rate" using a 0.05% to 0.10% solution of AmTide Imidacloprid 75% WDG Termiticide.</p> <p>Note: Overall treatments in which the chemical is applied more than 18 inches from the foundation walls, piers or pipes should not be applied within a crawl space that serves as a plenum.</p>
<p>Structures Containing Inaccessible Crawl Spaces</p>	<p>Inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow applicator access, should be excavated, if possible, and then treated according to the instructions for Accessible Crawl Spaces. Otherwise, apply using one, or a combination of, the following two methods:</p> <ol style="list-style-type: none"> 1. Establish a horizontal barrier by applying solution to the soil surface at a rate of 1 gallon of solution per 10 square feet overall. Use only nozzle pressures less than 25 p.s.i. and nozzle types (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle) that provide a coarse application droplet. If the area to be treated cannot be reached with the application wand, use one or more extension rods in applying the solution to the soil. Do not broadcast or power spray with pressures greater than 25 p.s.i. 2. Establish a horizontal barrier by drilling through the foundation wall or through the floor above. Treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Check the state regulations if the state has smaller interval requirements. <p>When treating crawl spaces used as plenums, turn off the air circulation system of the structure until the application has been completed and all termiticide has been absorbed by the soil.</p> <p>Note: Overall treatments in which the chemical is applied more than 18 inches from the foundation walls, piers or pipes should not be applied within a crawl space that serves as a plenum.</p>
<p>Masonry Voids</p>	<p>Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Use a rate of 2 gallons of solution per 10 linear feet of footing. Apply using a nozzle pressure of less than 25 p.s.i. Access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration before treatment.</p> <p>Any leaks or spills from the deposition of termiticide in locations other than those</p>

12
17

	<p>prescribed on this label must be cleaned up before leaving the application site. Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.</p> <p>Use caution when drilling veneer walls and do not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. Drilling through the veneer and into concrete blocks behind the veneer to treat the veneer and the concrete blocks at the same time is permitted.</p> <p>Note: Do not use this product in voids insulated with rigid foam.</p>
--	---

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS – DO NOT CONTAMINATE WELLS OR CISTERNS

Rate of AmTide Imidacloprid 75% WDG Termiticide	Directions and Restrictions
0.05% to 0.1%	<p>Structures With Wells/Cisterns Inside Foundations: Do not treat soil while it is beneath or within the foundation or soil found along the exterior perimeter of a structure that contains a well or cistern. Use the treated backfill method when soil is removed and treated outside/away from the foundation. Apply AmTide Imidacloprid 75% WDG Termiticide only using the treated backfill method:</p> <ol style="list-style-type: none"> 1. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow; 2. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Refer to the "Mixing Directions for AmTide Imidacloprid 75% WDG Termiticide" section of this label. Thoroughly mix the product into the soil taking care to contain the spray solution. Do not allow the spray solution to runoff or to spill. 3. Once the treated soil has absorbed the solution, the soil can be replaced into the trench. <p>Structures With Adjacent Wells/Cisterns and/or Other Water Bodies: Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below before making an application.</p> <ol style="list-style-type: none"> 1. Before treatment, if feasible, expose the water pipe(s) coming from the well to the structure, if the pipe(s) enter the structure within 3 feet of grade. 2. Before treatment, applicators are advised to take precautions to limit the risk of <i>applying the termiticide into subsurface drains that could empty into any bodies of water</i>. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment. 3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

13
17

FOAM APPLICATION

Rate of AmTide Imidacloprid 75% WDG Termiticide	Directions and Restrictions
0.05%	<p>Under some situations, delivery of AmTide Imidacloprid 75% WDG Termiticide in the form of a foam will improve the dispersal of AmTide Imidacloprid 75% WDG Termiticide into and within the intended target area. Foam also allows the application to be made in a reduced amount of water, compared to conventional applications, and is useful to prevent water damage on or around treated areas. Certain factors such as construction practices and soil subsidence may prevent creation of a continuous treated zone using conventional treatment alone. In these cases or when necessary, the use of foam along with conventional application methods will be successful in creating a continuous treated zone.</p> <p>Follow the "Mixing Directions Table to Prepare 0.05% Foams", below, to convert an aqueous solution of AmTide Imidacloprid 75% WDG Termiticide into a predetermined amount of foam using foam-generating equipment.</p> <p>Apply foams behind veneers, piers, bases of chimney, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Apply with dispersion tips and using application methods appropriate to the site. Always apply a sufficient volume of AmTide Imidacloprid 75% WDG Termiticide in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.</p> <p>Depending on the circumstances, AmTide Imidacloprid 75% WDG Termiticide may be applied in the form of foam alone or in combination with liquid solution applications. If applied in combination, do not exceed the labeled amount of active ingredient applied per unit area. At least 75% of the gallons of AmTide Imidacloprid 75% WDG Termiticide must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to ensure an effective treatment.</p>

Mixing Directions Table to Prepare 0.05% Foam

To Prepare 25 Gallons of Foam			To Prepare 50 Gallons of Foam		
Amount of AmTide Imidacloprid 75% WDG Termiticide to Add to Water	Gal. of Water	Expansion Ratios	Amount of AmTide Imidacloprid 75% WDG Termiticide to Add to Water	Gal. of Water	Expansion Ratios
2.25 ounces	1.0	25:1	4.50 ounces	1.0	50:1
	2.5	10:1		2.5	20:1
	5.0	5:1		5.0	10:1

Preparation of AmTide Imidacloprid 75% WDG Termiticide 0.05% Foams: Use the information in the table to prepare 25 gallons expanded foam (2.25 ounces of AmTide Imidacloprid 75% WDG Termiticide mixed with between 1 and 5 gallons of water) or 50 gallons expanded foam (4.50 ounces of AmTide Imidacloprid 75% WDG Termiticide mixed with between 1 and 5 gallons of water). The concentration of the active ingredient in both foams is 0.05% imidacloprid.

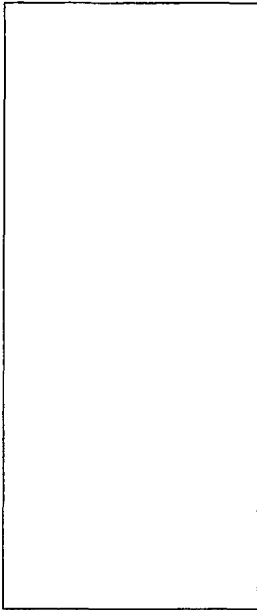
Mix AmTide Imidacloprid 75% WDG Termiticide with water before adding the foaming agent manufacturer's recommended amount of foaming agent to the solution. Prepare the foam according to the foaming agent's and foaming equipment manufacturer's recommendations. Test the compatibility of the foaming agent with AmTide Imidacloprid 75% WDG Termiticide before mixing or using the foaming agent with AmTide Imidacloprid 75% WDG Termiticide.

19
17

SPECIAL APPLICATIONS

Use or Use Site/Pests	Rate of AmTide Imidacloprid 75% WDG Termiticide	Directions and Restrictions
Spot Applications		<p>When another registered termiticide is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas, AmTide Imidacloprid 75% WDG Termiticide may be applied as a spot treatment.</p> <p>Only the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, are to be used when applying AmTide Imidacloprid 75% WDG Termiticide. Spot applications may be made only to areas of a structure that are deemed critical (bath traps, expansion joints, plumbing and utility entries) for secondary treatments such as AmTide Imidacloprid 75% WDG Termiticide.</p>
Protection of Buried (Underground) Utilities – Subterranean termites	0.05 to 0.1%	<p>Underground Utilities (such as wires, conduits, cables and pipes): Items buried in the soil can be protected from termite attack by treating the soil around the components and along the entire length of the underground items with AmTide Imidacloprid 75% WDG Termiticide. The location of such utility items may be within the foundation of a structure or outside a structure, such as within a utility right of way.</p> <p>Before laying the utility items, treat the soil along the entire length that the items will be laid with AmTide Imidacloprid 75% WDG Termiticide at a rate of 2 gallons of solution per 10 linear feet. Install the utilities by placing them on the treated soil and then cover them with untreated soil. Treat the covering soil at 2 gallons of solution per 10 linear feet. Soils that will not absorb the indicated amount of solution may be treated with as little as 1 gallon of a 0.10% solution per 10 linear feet. Points where services emerge from the ground may be treated at a rate of 1 to 2 gallons of solution.</p> <p>Do not treat utilities that are electrically energized at the time of application.</p>
Protection of Wood – Subterranean Termites		<p>Poles, Posts, and Other Wood Structural Items Located Below Ground: To use AmTide Imidacloprid 75% WDG Termiticide to protect these wood items from termites, treat the areas around the wood component by vertically rodding the soil around the perimeter of the item to be treated to a depth of six inches below the maximum depth of placement of the item in the soil. Apply a solution of AmTide Imidacloprid 75% WDG Termiticide using 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.</p>
Above Ground Wall Voids - Termite Carton Nests		<p>Above Ground Wall Voids: Direct the solution or foam of AmTide Imidacloprid 75% WDG Termiticide into termite carton nests including nests located above the ground in wall voids. Make applications using a directional injector and use solutions or foams under pressure to ensure an even distribution of the product throughout the nest. Additional injections at other points or depths within the nest may be required to adequately distribute a solution within the nest.</p>
Outdoor Structural Control - Ants		<p>Prior to application, remove or prune any shrubs, bushes or branches that touch the structure or treated area in order to eliminate points of entry for ants into the structure. The ants must come in contact with the solution to be effective. Spray AmTide Imidacloprid 75% WDG Termiticide directly into nests if found in these plants.</p> <p>Exterior Structures: Apply AmTide Imidacloprid 75% WDG Termiticide as a general surface, spot, crack and crevice, or wall void application in sufficient volume to cover the target surface(s). Direct spray or foam to parts of structure where ants may enter or hide under (such as exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure). Direct</p>

15
17



sprays where ants or their nests are present. Do not apply sprays that will runoff from vertical or overhead surfaces.

Soil, turf or ground cover (such as flower, shrub and plant beds) adjacent to structures: Apply AmTide Imidacloprid 75% WDG Termiticide to the soil where ants are trailing or may find food. Drench applications or soil injections may be made to soil to control ants that tunnel in the soil. Apply AmTide Imidacloprid 75% WDG Termiticide in a sufficient volume to treat or cover soils or foliage along the edge of foundations or other hard surfaces such as driveways.

Trees: Inject AmTide Imidacloprid 75% WDG Termiticide spray or foam into parts sections of trees where ant nests are located.

Restrictions:

- Use this product only to control carpenter ants for treatment of non-wooden parts or surfaces of structures.
- Do not apply AmTide Imidacloprid 75% WDG Termiticide to control native fire ants, imported fire ants, pharaoh ants or harvester ants.
- Make only one application per month.
- Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until sprays have dried.

RETREATMENT – SUBTERRANEAN TERMITES

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions, and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either spot or complete treatment.

If no reinfestation or barrier disruption has occurred for five or more years after a complete treatment was last made to the structure, then retreatments may be considered. These retreatments must be based on the judgment of the applicator that the retreatment is necessary to ensure continued protection of the structure from termite attack. Various factors must be considered by the applicator (such as the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase its vulnerability to attack).

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

6
17**STORAGE AND DISPOSAL**

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

PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner as to prevent spillage. Do not put concentrate or dilute material into food or drink containers.

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

CONTAINER DISPOSAL (Plastic Containers): ~~Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.~~

CONTAINER DISPOSAL (Foil Bags): ~~Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. 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.~~

CONTAINER DISPOSAL (Foil Bags): Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or 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.

CONTAINER DISPOSAL (Plastic containers): Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

AmTide LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or AmTide LLC, and Buyer and User assumes the risk of any such used. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, AMTIDE LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product in the event of ineffectiveness or other unintended consequences that may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of AmTide LLC or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold AmTide LLC and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, in no event shall AmTide LLC or Seller be liable for any incidental, consequential, or special damages resulting from the use or handling of this product. **THE**

5/5

EXCLUSIVE REMEDY OF THE USER AND BUYER, AND THE EXCLUSIVE LIABILITY OF AMTIDE LLC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE, AT THE ELECTION OF AMTIDE LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT, OR COMPENSATION LIMITED TO DAMAGES NOT EXCEEDING THE FAIR MARKET PURCHASE PRICE, AND SHALL NOT INCLUDE INCIDENTAL OR CONSEQUENTIAL DAMAGES.

AmTide LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by the duly authorized representative of AmTide LLC.

EPA 2008050920100217