

228-487

9-13-2006

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Use read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

	United States	<input type="checkbox"/> Registration	OPP Identifier Number
	Environmental Protection Agency	<input type="checkbox"/> Amendment	
	Washington, DC 20460	<input checked="" type="checkbox"/> Other	

Application for Pesticide - Section I

1. Company/Product Number 228-487	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Imidacloprid PCO Flowable	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas, Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527 <input checked="" 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 _____	NOTIFICATION SEP 13 2006
<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.)

Label notification consistent with PRN 98-10, see cover letter for detailed explanation. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, 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 type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* 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 type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph 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 George Meindl george.meindl@us.nufarm.com	Title Registration Manager	Telephone No. (Include Area Code) 630.455.2017
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. Date Application Received (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name George Meindl	5. Date 8/17/2006	

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NOTIFICATION

SEP 13 2006

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IMIDACLOPRID PCO FLOWABLE

For use 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, drywood termites,
dampwood termites, carpenter ants, and other wood-infesting insects.

ACTIVE INGREDIENT:		
Imidacloprid		21.4%
OTHER INGREDIENTS:		78.6%
	TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE INSIDE FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 228-487
EPA EST. NO.

MANUFACTURED FOR
NUFARM AMERICAS INC.
BURR RIDGE, IL 60527



NET CONTENTS GALS.

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Wear long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves (such as Natural Rubber, Selection Category A).

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.

Personal Protective Equipment (PPE)

All pesticide handlers (mixers, loaders, and applicators) must wear long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks, shoes must be worn. 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 injection.

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 the 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 to 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 to 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.
IF INHALED	<ul style="list-style-type: none"> • Move the person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further 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 1-877-325-1840 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

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.

DIRECTIONS FOR USE

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

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 area, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

SHAKE WELL BEFORE USING.

MIXING: Refer to Mixing Table for proper amount to be used.

Mix the termiticide use dilution in the following manner. Fill tank 1/4 to 1/3 full. If using large sprayer, start pump to begin bypass agitation and place end of treating tool in tank to allow circulation through hose. Add appropriate amount of this product. P 11

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remaining amount of water. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

MIXING TABLE		
Concentration	Amount of Product	Amount of Water
.05%	.3 fl. oz. / 8mL	1 fl. oz.
	1.5 fl. oz. / 40mL	5 gal.
	3 fl. oz. / 80mL	10 gal.
	6.9 fl. oz.	25 gal.
	13.8 fl. oz.	50 gal.
	27.5 fl. oz.	100 gal.
0.1%	.6 fl. oz. / 16 mL	1 fl.oz.
	3 fl. oz. / 80 mL	5 gal.
	6 fl. oz. / 160 mL	10 gal.
	13.8 fl. oz.	25 gal.
	27.5 fl. oz.	50 gal.
	55 fl. oz.	100 gal.

PROPORTIONAL INJECTOR MIXING TABLE	
INJECTOR VOLUME (fl oz/gal)	CONCENTRATION (%)
0.3	0.05
0.6	0.10

IN-LINE-INJECTION: For the desired application rate, use the proportional injector mixing table to determine the amount of this product for a given injection volume of finished emulsion.

CONVERSION KEY: 128 fl oz = 1 gal, 16 fl oz = 1 pint, 8 pints = 1 gal, 1 fl oz = 29.5 mL

APPLICATION VOLUME

It is recommended that application volumes described in the "DIRECTIONS FOR USE" be used whenever possible. However, where soil conditions will not accept application of 4 gallons of this product per 10 linear feet, twice the concentration may be applied in 2 gallons of solution per 10 linear feet. For example, if 0.05% is the correct use rate to be applied in 4 gallons of water, then 2 gallons of 0.1% dilution may be used per 10 linear feet to deliver an equivalent amount of this product per unit of soil.

CONTROL - GENERAL

Treatment standards for subterranean termite control may vary due to regulations, treatment procedures, soil types, construction practices and other factors. The purpose of chemical soil treatment for termite control is to establish a continuous chemical treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in the structure and the termite colonies in the soil. Follow all federal, state, and local regulations and treatment standards for protection of a structure from termites. In some instances where an aerial or above ground colony is established, supplemental treatments to control the termites, landscape modifications, and/or structural repairs may be needed to deprive termites of a moisture source. Use a 0.05% to 0.1% dilution based on local recommendations. Generally a 0.05% dilution is used for typical control situations. Where severe or persistent infestations occur a 0.1% dilution may be used.

PRE-CONSTRUCTION TREATMENT

Do not apply at a lower dosage and/or concentration than specified on this label for application prior to installation of the finished grade.

Prior to 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.

CONCRETE SLAB-ON-GROUND OR BASEMENTS: Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floor and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear 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.

After completion of grading, make an application 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 in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes should not extend below the footing. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use

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a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat soil which will be placed in the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 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.

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, at the rate prescribed 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 termiticide treated zone.

CRAWL SPACES: Application should 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. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone. 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 with soil as it is being placed in the trench.

HOLLOW BLOCK FOUNDATIONS OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical 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. 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 attention 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 reoccupy the contaminated areas of the structure until the clean up is completed.

POST-CONSTRUCTION TREATMENT

CONCRETE SLAB-ON-GROUND: To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet per foot of depth to provide a uniform treated zone. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

An application should be made by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil as it is being placed in the trench.

Rodding can be done from the bottom of a shallow trench. When rodding, rod holes should be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod hole depth should not extend below the footing.

BATH TRAPS: Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas should be treated with 3 gallons of solution per square foot. An access door or inspection vent should be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

CRAWL SPACES: When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to Pre-Construction Treatment). If unable to excavate, crawl space soil treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform chemical treated zone. Use a very coarse spray at a pressure not exceeding 25 PSI at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil. Do not apply to inaccessible crawl space areas using pressures greater than 25 PSI at the treatment tool when the valve is open.

Treatment may also be made by drilling through the foundation wall or through the floor above and treating 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. Many states have smaller intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above an overall soil

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treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform chemical treated zone.

SHALLOW FOUNDATIONS: For shallow foundations, one foot or less in depth, dig a narrow trench approximately 6 inches wide and deep along the outside and inside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to the top of footer to provide a uniform treated zone. The dilution should be applied to the trench and mixed with the soil as it is placed in the trench.

BASEMENTS – OUTSIDE PERIMETER: Along the outside of the exterior walls, an application must be made by trenching or rodding within the trench. Rodding depth should be to the top of the footer, or to a minimum of 4 feet or according to state or local regulations. When rodding through a trench, dig a narrow trench about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone by rodding through the trench. Use a low pressure spray to treat soil which will be placed into the trench after rodding. Mix spray solution with this soil as it is being placed in the trench.

BASEMENTS – INSIDE PERIMETER: If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around sewer pipes, floor drains, conduits, expansion joints or any cracks or holes in the basement floor. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to provide a uniform treated zone.

Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

HOLLOW BLOCK FOUNDATION OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical 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. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

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 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 reoccupy contaminated areas of the structure until the clean up is completed.

PLENUMS: For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing and conduits. The soil should be treated by trenching to a depth of 6 inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 PSI when measured at the treating tool when valve is on).

When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

TREATMENT AROUND WITH WELLS OR CISTERNS: Do not contaminate wells or cisterns.

Structures With Wells/Cisterns Inside Foundations: Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

1. Do not apply within 5 feet of any well or cistern by rodding and/or trenching or by the backfill method. Treat soil between 5 and 10 feet from the well or cistern by the backfill method only. Treatment of soil adjacent to water pipes within 3 feet of grade should only be done by the backfill method.
 - a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
 - b) Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
 - c) After the treated soil has absorbed the solution, replace the soil into the trench.
2. Treat infested and/or damaged wood in place using an injection technique such as described in the "Control of Wood Infesting Pests" section of this label.

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 prior to making an application.

1. Prior to 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. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the

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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.

- 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.

FOAM APPLICATIONS

Construction practices, soil subsidence and other factors may create situations in which a continuous chemical treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices can be used to provide a continuous treated zone.

Foam application may be made alone or in combination with conventional application methods, provided that the labeled amount of active ingredient per unit area is used.

Foam Application Use Directions: Mix appropriate concentration in water and add the manufacturer's recommended quantity of foam agent to the solution (see table for foaming recommendations). Apply a sufficient volume of foam from this product alone or in combination with liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

THIS TABLE GIVES EXAMPLES IN MILLILITERS

MIXING TABLE				
THIS PRODUCT a (mL)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM	
			(gallons)	(ai%)
160	1	20:1	20	0.05
80	1	10:1	10	
40	1	5:1	5	

*Add the manufacturer's recommended quantity of foam agent to this product solution.

THIS TABLE GIVES EXAMPLES IN FLUID OUNCES

MIXING TABLE				
THIS PRODUCT b (fl oz)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM	
			(gallons)	(ai%)
6.9	1	25:1	25	0.05
	2.5	10:1		
	5	5:1		
13.8	1	50:1	50	
	2.5	20:1		
	5	10:1		

*Add the manufacturer's recommended quantity of foam agent to this product solution.

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

Foam and liquid applications must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of this product must be applied as a typical liquid treatment. The remaining 25% or less gallons is delivered to appropriate locations using a foam application.

NOTE: When foam is used solely to kill subterranean termites in aboveground locations (such as feeding galleries in wooden framing, or in voids with framed walls), and whenever the target pest is other than subterranean termites (drywood termites, beetles, ants, etc.), dilute solutions of this product may be expanded by foaming without concentrating the solution as previously described for soil applications. Add the manufacturers' recommended volume of foaming agent to produce foam of the desired expansion ratio. Use application tips and methods suitable to the site and pest.

CONTROL OF WOOD INFESTING PESTS

For control of above ground termites and carpenter ants in localized areas, apply a 0.05 to 0.1% solution or sufficient volume of this product's foam to voids and galleries in damaged wood, and in spaces between wooden structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to inaccessible areas by drilling, and then injecting the suspension or foam with a suitable directional injector into the damaged wood or wall voids. Termite carton nests in building voids may be injected with a 0.05 to 0.1% suspension of foam. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such nests are found.

Application to attics, crawl spaces, unfinished basements, or manmade voids may be made with a coarse fan spray of 0.05 to 0.1% solution or foam to control exposed worker and winged reproductive forms of termites or carpenter ants. This type of application is intended to be a supplemental treatment for control of above ground subterranean termites and carpenter ants.

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Use a 0.05% to 0.1% solution to control existing infestations of or to prevent infestation by termites or carpenter ants in trees, utility poles, fencing and decking materials, landscape timbers and similar non-structural wood-to-soil contacts. If possible, locate the interior infested cavity and inject 0.05 to 0.1% solution or sufficient volume of this product's foam using an appropriate treatment tool with a splashback guard. These non-structural wood-to-soil contacts may also be treated by applying a solution* to the soil as a spot application or continuous treated zone applied as a drench or by rodding around the base of the point(s) of soil contact(s). Rod holes should be placed approximately 3 inches away from the soil contact point(s) and spaced no more than 12 inches along the perimeter of the soil contact(s). For small poles or posts (<6 inches in diameter), apply 1 gallon per foot of depth. For larger constructions, apply 4 gallons per 10 linear feet per foot of depth. Retreat as needed to maintain protection.

Termite carton nests in trees may be injected with a 0.05 to 0.1% solution or sufficient volume of foam using a pointed injection tool. Multiple injection points to varying depths may be necessary. Removal of carton material from trees is desirable but may not be necessary when foam application is used. In some instances, a perimeter application of a 0.05% to 0.1% solutions applied to soil around the root flare of the tree may be necessary to prevent reinfestation by termites in the soil. For small trees (<6 inches in diameter), apply 1 gallon of solution. For larger trees, apply 4 gallons per 10 linear feet (measured as the circumference at the root flare).

For protection of firewood or other wood products stored in contact with soil from carpenter ants and termites, treat soil prior to stacking with a 0.05 to 0.1% solution at 1 gallon per 10 square feet to prevent infestation. Curative application to the soil around firewood or other wood products stored in contact with soil may be made as described for non-structural wood-to-soil contacts (above).

Drywood termites and wood-infesting beetles or borers (such as, but not limited to, powder post beetles, anobid or deathwatch beetles, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles). Galleries and structure voids can be treated with sprays, mists, or foams of a 0.05% to 0.1% solution. Locate galleries by using visual signs (frass or pellets, blistered wood, emergence or clean out holes), the presence of live insects, mechanical sounding techniques, or listening devices (e.g., stethoscopes, acoustic emission detectors). Penetrate the gallery system by drilling holes to receive the injector tip or treatment tool. Distribute drill holes to adequately cover the gallery system. (NOTE: Avoid drilling where electrical wiring, plumbing lines, etc. are located.) Apply solutions as a low pressure (about 20 psi) spray or by misting or, where appropriate, by foaming. It is not necessary to treat to the point where runoff is detected from adjacent holes. (NOTE: Do not apply where electrical shock hazards exist.) Drill holes should be sealed after treatment. Also, wood surfaces can be sprayed or misted with a 0.05% to 0.1% solution or where appropriate, use a sufficient volume of foam. For inaccessible surfaces, drill and treat the interior of structural voids. Surfaces treated may include exposed wooden surfaces in crawlspaces, basements, or attics, wooden exterior surfaces such as decks, fencing, or siding, structural voids, channels in damaged wood, in spaces between wooden members of a structure, and junctions between wood and foundations. Apply by brushing or as a coarse, low pressure (about 20 psi) spray to the wood surface; apply sufficient volume to cover the surface to the point of wetness, but avoid applying to the point of runoff. When spraying overhead in living areas, cover surfaces below the treated area with plastic sheeting or similar material. Avoid contact with treated surfaces until spray deposits have dried. Retreat as needed to maintain protection.

Localized treatment for carpenter bees: Apply a 0.05% to 0.1% solution as a spray or mist, or sufficient volume of foam, directly into gallery entrance holes. Following treatment, entrance holes may be plugged with small pieces of steel wool or similar material.

RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide treated zone in the soil. These vulnerable or reinfested areas may be treated 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 treated zone. Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgement of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment, the applicator should consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

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

APPLICATION IN CONJUNCTION WITH BORATES OR BAITING SYSTEMS: When another registered termite control product/system is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas, this product may be applied as a spot application in a secondary treatment to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks, the outside foundation wall, and areas of known or suspected activity at either a pre-construction or post-construction timing. These secondary treatments must be applied in amounts and concentration in accordance with label directions relevant to the treatment area(s) to receive the secondary treatment.

PERIMETER PEST CONTROL

ANTS: For control of ants in houses and other structures, apply a 0.05 to 0.1% solution as a general surface, spot, crack and crevice or wall void application. Apply to surfaces on buildings, porches, patios and other structures, around doors, windows, eaves and attic vents, utility entry points, soffit areas and other exterior openings (including foundation cracks or drilled holes) where these pests enter the structure or where they crawl or hide. Spray into cracks and crevices. Spray, mist or foam into voids where these ants or their nests are present. Apply the volume of spray mist or foam sufficient to cover the area, but do not allow excessive dripping or run-

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off to occur from vertical or overhead surfaces.

Treat soil, turf or ground cover adjacent to the structure where ants are trailing or may find food or harborage. Apply to flower, shrub or ornamental plant beds adjacent to the structure where ants may find food or forage. To control ants tunneling in soil apply a 0.05% to 0.1% solution as a drench or a soil injection at intervals to establish a continuous treated zone. Treat along the edge of walls, driveways or other hard surfaces where ants are tunneling beneath the surface.

Aerial Nests: If ant nests are located in tree hollows or non-structural wooden construction (e.g.; posts, fences, decks) treat the interior cavity and/or the nest site by injecting a 0.05% to 0.1% solution as a spray mist, or sufficient volume of foam.

Apply in sufficient water to cover the foliage and soil area being treated. Maximum application is once per month to maintain control.

Do not allow residents or pets into the immediate area during the application or contact with treated areas until the spray has dried.

Do not use this product against native or imported fire ants, pharaoh ants or harvester ants.

NOTE: Where severe pest pressures may exist and when rapid knockdown or exclusion in pest entry points is desired, supplement treatments using this product with targeted applications of a pyrethroid such as Menace™ to doors and windows, utility entry points, and other places where these pests enter the structure. Read and follow all label directions for use of this companion product.

GENERAL PRECAUTIONS FOR APPLICATION

After treatment, plug and fill all holes drilled in concrete slab areas of the building with a suitable sealant.

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.

Do not plant for the purpose of consumption, edible plants into the treated areas of soil.

Avoid contamination of public and private water supplies.

Use anti-backflow equipment or an air gap on filling hoses.

Consult State, Federal, or local authorities for information regarding the approved treatment practices for areas in close proximity to potable water supplies.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking, invert to prevent leakage. If container is leaking or material spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides below. In spill or leak incidents, keep unauthorized people away.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, 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.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Desirable plant injury, ineffectiveness, or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions beyond the control of Nufarm or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Nufarm and Seller harmless for any claims relating to such factors.

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the directions under normal conditions of use. NUFARM MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE OR USE OF THIS PRODUCT. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to (or beyond the control of) Seller or Nufarm, and Buyer assumes the risk of any such use.

To the extent allowed by law, Nufarm or Seller shall not be liable for any incidental, consequential or special damages resulting from

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the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF NUFARM 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 THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR AT THE ELECTION OF NUFARM OR SELLER, THE REPLACEMENT OF PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

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August 17, 2006

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Imidacloprid PCO Flowable
EPA Reg. No. 228-487
Label notification per PR98-10

Dear Ms. Hobgood:

The state of Florida has identified a correction that needs to be made to our label. In two (2) places the word "should" needs to be "must". Both of these corrections appear in the preconstruction treatment section, bottom on page 3 and near the top on page 4. After discussing this issue today with Venus Eagle, EPA product manager for this registration, she agreed this could be handled as a notification per EPA PRN 98-10.

To process this request please find enclosed the following:

- Application for Pesticide Registration (EPA form 8570-1)
- Revised labeling with areas of change clearly identified (1 copy)
- Revised labeling - clean (1 copy)

If you should have any questions regarding this matter, please feel free to contact me at 630.455.2017 or email at george.meindl@us.nufarm.com.

Sincerely,

George Meindl
Registration Manager
Nufarm Americas, Inc.