



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Mary Beth Endres
Product Registration
Nufarm Americas, Inc.,
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

MAY 1 2008

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request General Label Change
EPA Reg. No. 228-522
Application Dated April 10, 2008

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 04/10/08 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

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

1. Company/Product Number 228-522	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Senator 600 FS	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527 <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 to add language excluding use on certain oil seed crops in California to the label per PR Notice 98-10.

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 any false statement 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:				2. Type of Container	
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			<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 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 Mary Beth Endres	Title Registration Manager	Telephone No. (Include Area Code) 630-455-2011
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 both under applicable law.		6. Date Application Received (Stamped)
2. Signature 		3. Title Registration Manager
4. Typed Name Mary Beth Endres		
		5. Date 04-11-2008

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

Caution: Harmful if inhaled. Harmful if swallowed. Avoid breathing spray mist. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contact with eyes or clothing. Wear protective eyewear, long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as polyethylene, polyvinylchloride (PVC) or viton.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear: long-sleeved shirt and long pants, socks, shoes, protective eyewear and chemical-resistant gloves (such as nitrile, butyl, neoprene, barrier laminate, polyvinyl chloride or Viton). Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS	
Users Should:	
<ul style="list-style-type: none"> • Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. • Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. • Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. 	

FIRST AID	
IF INHALED	<ul style="list-style-type: none"> • Move 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.
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 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. • 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 1-877-325-1840 for emergency medical treatment information.	

ENVIRONMENTAL HAZARDS

This product is highly toxic to birds and aquatic invertebrates. For terrestrial uses, do not apply directly to water, or 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. Cover or incorporate spilled treated seeds.

DIRECTIONS FOR USE

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

For use in commercial seed treaters only, with the exception of application to canola, cotton (delinted seed), field corn, sorghum, wheat and barley, which may be made either by commercial seed treatment or as an end-use seed treatment on agricultural establishments at, or immediately before, planting. This product is to be used in liquid or slurry treaters.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Mix thoroughly before use or use entire container at one time. All tank mixes should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

Exception: If the seed is treated with the product and the treated seed is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated. PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material such as, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.
- Shoes plus socks
- Protective eyewear

ROTATIONAL CROPS

Treated areas may be replanted with any crop specified on an imidacloprid label, or any crop for which a tolerance exists for the active ingredient, as soon as practical following the last application. The following plant-back intervals should be observed for listed crops:

ROTATIONAL PLANT-BACK INTERVALS*				
IMMEDIATE PLANT-BACK				30-DAY PLANT-BACK
Artichoke	Cranberry	Oats	Strawberry	Cereals, including: buckwheat millet rice
Barley	Cucurbits	Okra	Sugarbeet	
Borage	Eggplant	Pepinos	Sunflower	
Brassica (cole)	Flax	Pepper	Tomatillo	
leafy vegetable	Ground cherry	Popcorn	Tomato	
Canola	Leaf petiole vegetable	Potato	Triticale	
Cilantro	Leafy vegetable	Rapeseed	Veg. Root and Tuber	
Corn, Field	Legume vegetable	Rye	Watercress	
Corn, Sweet	(succulent or dried,	Safflower	Wheat	
Cotton	except soybean)	Sorghum		
Crambe	Mustard Seed	Soybean		

* Cover crops for soil building or erosion control may be planted any time, but do not graze or harvest for food or feed.
 * For all other crops not listed on an imidacloprid label, or for crops for which no tolerance for the active ingredient has been established, a 12-month plant-back interval should be observed.

NOTIFICATION of the crop rotational restriction must be conveyed to the grower by appropriate seed tag labeling or bag printing on all seed units.

NOTE: The purchaser of this product is responsible for ensuring that all seed treated with this product are adequately dyed with a suitable color to prevent its accidental use as food for man or feed for animals. Refer to 21 CFR, Part 2.25. Any dye or colorant added to treated seed must be cleared for use under 40 CFR, Part 180.1001. Federal regulations have established official tolerances for certain pesticide residues. In order that residues on food and forage crops will not exceed established tolerances, use only at recommended rates.

Treated seed must not be used for or mixed with food or animal feed or processed for oil. Seed commercially treated with this product must be labeled in accordance with all applicable requirements of the Federal Seed Act.

Labels for commercially treated seed should include the following addition to the Environmental Hazards statements:

Exposed treated seed may be hazardous to birds. Dispose of all excess treated seed and seed packaging by burial away from bodies of water. Cover or incorporate spilled treated seeds.

USE RESTRICTIONS

Rape greens grown and harvested from this product's treated seed must not be used for human and feed consumption. Rapeseed grown and harvested from this product's treated seed is only for industrial uses and can not be used for edible oil or any other human/feed consumption.

Wheat, Barley, Oats, Rye, Triticale, Sorghum: Do not graze or feed livestock on treated areas for 45 days after planting.

Cotton (delinted seed only): Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of 0.5 pound of imidacloprid per acre per cropping cycle.

Stored Seed Protection: Applied at labeled rates equal to or above 0.8 fluid ounce per hundredweight, this product will provide protection to seed against injury from the following insects: Indian Meal Moth (*Plodia interpunctella*), Rice Weevil (*Sitophilus oryzae*), Red Flour Beetle (*Tribolium castaneum*), and Lesser Grain Borer (*Rhizopertha dominica*). It is recommended that seed with existing populations of stored grain pests be fumigated prior to treating and bagging seed.

For Early Season Protection Against Certain Sucking Insects: This product will aid in the protection of seeds and seedlings against injury by certain early season insects.

Oil Seed Crop Group

Canola, rapeseed, mustard seed: To provide early season protection of seedlings against injury by aphids, flea beetles and wireworms apply as a commercial seed treatment at 10.24 to 25.6 fluid ounces per hundredweight of seed. In areas where flea beetles and foliar insects are in high numbers, the higher application rate is recommended. Please consult your local agricultural office for pest patterns, history, and forecasts to assist in determining the appropriate rate for your region.

For suppression of Lygus bugs, including *Lygus spp.*, in their second generation and cabbage Seedpod Weevil larvae, including *Ceutorhynchus assimilis*, apply 15.36 to 25.6 fluid ounces per hundredweight of seed.

Flax*, crambe*, and borage*: To provide early season protection of seedlings against wireworms, seed corn maggots and flea beetles apply as a commercial seed treatment at 25.6 fluid ounces per hundredweight of seed.

Safflower*: To provide early season protection of seedlings against wireworms, apply as a commercial seed treatment at 0.25 to 0.50 mg a.i./seed. (One fluid ounce of this product contains 17.7g imidacloprid.)

Sunflower*: To provide early season protection of seedlings against wireworms, seed corn maggots and flea beetles apply as a commercial seed treatment at 0.25 to 0.50 mg a.i./seed. (One fluid ounce of this product contains 17.7g imidacloprid.)

Sunflower seed treated in California must be destined for planting in states other than California and is not to be planted in California.

* Excluding California

Oil Seed Crop Group: For End-Use Application At Agricultural Establishments

Canola, rapeseed, mustard seed: Apply using an HCBT or a Batch Treater. Shake this product thoroughly before use. Apply 5.1 to 12.8 fluid ounces of this product per 50 pound bag. This product may be diluted with an approved Nufarm fungicide mixture for extended disease protection. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

Flax*, sunflower*, crambe*, and borage*: To provide early season protection of seedlings against wireworms, seed corn maggots and flea beetles apply using an HCBT or a batch treater at 12.8 fluid ounces per hundredweight of seed.

Safflower*: To provide early season protection of seedlings against wireworms, apply using HCBT or a batch treater at 12.8 fluid ounces per hundredweight of seed.

* Excluding California

Field Corn:

For the protection of corn plants from the corn insect pests listed below, apply as a seed treatment at the recommended rates listed.

PEST	THIS PRODUCT	
	MG.AI PER KERNEL	FLUID OUNCE PER 80,000 UNITS OF SEED
Corn root worm (including Northern, Western, Southern and Mexican ¹) Flea beetle Chinch bug Southern green stinkbug White grub Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Southern corn leaf beetle Billbug ² Grape colaspis ² Black cutworm ³	1.34	6.0
Flea beetle Chinch bug Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Grape colaspis ² White grub	0.60	2.70
Seed corn maggot (seed protection only) Wireworm (seed protection only) Flea beetle (through 1 leaf stage) Imported fire ant White grub ⁴	0.16	0.72

- 1 In areas of heavy to severe corn rootworm populations, protection will not be adequate. Use only in areas of light to moderate corn rootworm populations. Consult your State Agricultural Extension Service on levels of corn rootworm populations.
- 2 Reduces early season feeding damage.
- 3 Will reduce feeding damage caused by leaf feeding black cutworms that are 1/2 inch or less in length.
- 4 Reduces feeding damage during emergence and seedling stages.

Field Corn: For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute this product with water and/or an approved Nufarm fungicide mixture. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50 pound bag of seed. Treat one-half of slurry mix. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50 pound bag of seed following the product application and allow it to distribute evenly on the seed.

Wheat, Barley, Oats, Rye, Triticale: To provide early season protection of seedlings against injury by aphids, (including Bird cherry-oat, English grain, Greenbug and Russian wheat aphid), Hessian fly, apply 0.8 to 2.4 fluid ounces per hundredweight of seed prior to planting as a slurry treatment. For low use rate for "wireworm-only" protection; use this product applied at the 0.13 to 0.26 fluid ounce per hundredweight of seed offers suppression of wireworm activity on seed and young seedlings. To provide early season protection from grasshopper damage, this product should be applied to seed at 1.2 to 2.4 fluid ounces per hundredweight. To reduce early season damage caused by grasshopper, this product's treated seed may be planted as a 50 to 60 foot border around the edges of the field. Consult your local university extension entomologist for details regarding grasshopper control in your area. For maximum effectiveness, seed should be treated uniformly. Use the higher rate to provide increased length of protection and from heavy insect pressure and from wireworms, and to reduce potential spread of Barley yellow dwarf virus due to aphid vectors. Do not graze or feed livestock on treated areas for 45 days after planting.

Wheat, Barley, Oats, Rye, Triticale: For End-Use Application at Agricultural Establishments: Apply using a Total Slurry Treater (TST), Farmer Applied Seed Treater (F.A.S.T.), Farmer Air Pressure System (FAP) or other on-farm seed treating equipment to deliver accurate rates of this product to achieve optimum product performance. Apply 0.8 to 2.4 fluid ounces per hundredweight of seed. This product should be combined with a Nufarm fungicide product for seed and seedling protection against fungal pathogens, as well as insect pests. Dilution with water may be necessary depending on fungicide formulation used. This product may also be applied on-farm as an over-treatment to seed pretreated with a fungicide. In this case, dilution is necessary. Do not graze or feed livestock on treated areas for 45 days after planting.

Sorghum: To provide early season protection of seedlings against injury by Aphids (including Corn leaf, English grain, Greenbug, and Yellow sugar cane aphid), Chinch bugs, Fire ants and Wireworms, apply 6.4 fluid ounces per hundredweight of seed prior to planting as a slurry treatment. Ensure thorough coverage. Do not graze or feed livestock on treated areas for 45 days after planting.

Sorghum: For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute 3.2 fluid ounces of this product with water. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50-pound bag of seed following the product application and allow it to distribute evenly on the seed. Do not graze or feed livestock on treated areas for 45 days after planting.

Cotton (Delinted Seed Only): To provide protection of seedlings against injury by early season thrips and aphids, and where the specific application rate is desired on an individual seed basis, apply at 0.375mg. ai. per seed (do not apply more than 12.8 fluid ounces per hundredweight of seed) prior to planting as a slurry treatment so as to ensure thorough coverage. Otherwise, apply at 12.8 fluid ounces per hundredweight of seed. Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of 0.5 pound of imidacloprid per acre per cropping cycle.

Cotton (Delinted Seed Only): For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute 6.4 fluid ounces of this product with water or a ready-to-use fungicide mixture, such as RTU-VITAVAX-Thiram or ALLEGIANCE-FL, for each 50-pound bag of cottonseed to be treated. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

Sugar Beets: To provide early season protection of seedlings against injury by Whitefly, Aphids, Leafhoppers (including to reduce potential for spread of Curly top and Yellow mosaic virus due to aphid and leafhopper vectors), Root aphids, Thrips and Wireworms, apply as a commercial seed treatment at 2.4 to 5.0 fluid ounces of this product in or on a unit of pelleted sugar beet seed with a weight ratio of 2:1 pelleting mixture to raw seed (seed count 100,000 seed - approximately 1 kilogram by weight). Apply in a film coat directly to raw seed (100,000 seed or approximately 1 kilogram by weight) at a rate of 2.4 fluid ounces per unit of seed. If rates exceed 2.4 fluid ounces per unit, seed must be pelleted.

Sweet Corn: For the protection of sweet corn plants from the insect pests listed below, apply as a seed treatment at the recommended rates listed.

PEST	PRODUCT FLUID OUNCES / CWT. OF SEED
Flea beetle Early season corn leaf aphid Seed corn maggot Wireworm	6.4
Imported fire ant Early season corn leaf aphid Seed corn maggot Wireworm	3.2 to 6.4
Imported fire ant Seed corn maggot (seed protection) Wireworm (seed protection)	1.6 to 3.2
Wireworm (seed protection)	0.8 to 1.6

The final slurry rate should be adjusted to apply a rate of 16 to 20 fluid ounces of diluted solution per hundredweight of seed with commercial equipment.

Popcorn: To provide early season protection of seedlings against injury by flea beetles, apply as a commercial seed treatment at 6.4 fluid ounces per hundredweight of seed.

Soybean: For protection of planted seeds from damage caused by seed corn maggot, to reduce feeding damage caused by soybean aphids and over-wintering bean leaf beetles, and to help suppress the spread of certain viruses, apply 1.6 to 3.2 fluid ounces per hundredweight of seed. Use higher rates to provide increased length of protection and for heavy insect pressure. This product can be used as an over-treatment. Do not graze or feed livestock on soybean forage or hay.

