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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

APR 0 9 2014

Danielle Erding Winfield Solutions, LLC P.O. Box 64589 St. Paul, MN 55164

Subject:

Amended label adding pollinator protection language

Product Name: Imidacloprid 75% WSP Turf Insecticide

EPA Reg. No. 1381-227

Submission dated December 5, 2013

Dear Ms. Erding:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable. A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. See 40 CFR 156.10(a)(6).

Under 40 CFR 152.130(d), EPA may establish dates by which all product distributed or sold by the registrant must bear revised labeling. The following paragraphs set forth the schedule for ensuring that that your product bears revised labeling within a reasonable time period.

• Any product released for shipment after 2/28/14 must bear the new label.

If these conditions are not complied with, EPA will take appropriate action against this registration. If you have any questions please contact Autumn Metzger at 703-504-5314 or metzger.autumn@epa.gov.

Regards,

Venus Eagle, Product Manager (01)

Insecticide-Rodenticide Branch Registration Division (7505P)

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Imidacloprid 75% WSP Turf Insecticide

Systemic and foliar insect control in grapes, turfgrass (including sod farms), and on fruit and nut trees, landscape ornamentals, and interior plantscapes.

ACTIVE INGREDIENT:

Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-	-2-imidazolidinimine75.0	%
OTHER INGREDIENTS:	25.0	%
TOTAL:	100.0	%

WARNING AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail).

	FIRST AID
If swallowed	 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 do anything by moth an unconscious person
If in eyes:	 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.
If on skin or clothing:	 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.
	l emergency call toll free at 1-877-424-7452. Have the product container or label with poison control center or doctor, or going for treatment.
Note to	Physician: No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

May be fatal if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Keep children and pets away from treated area until spray is dry.

EPA Reg. No. 1381-227

EPA Est. No.

Distributed By:

Winfield Solutions, LLC P.O. Box 64589 St. Paul, MN 55164-0589 $\underline{\mathbb{P}} : \mathbb{R}$

WINFIELD

ACCEPTED APR 0 9 2014

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

EPA. Reg. No: 1381-227

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- 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

Follow manufacturer's instructions for cleaning/ maintaining personal protective equipment, PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS STATEMENTS

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- 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.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. 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.

This product is highly toxic to bees exposed to direct treatment or residues on the foliage of blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are foraging the treatment area.

This product is toxic to wildlife.

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

PROTECTION OF POLLINATORS

APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.

Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar. Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- o Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When Using This Product Take Steps To:

- o Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator attractive plants around the application site.
- o Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at: http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx.

Pesticide incidents (for example, bee kills) should immediately be reported to the state/tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at: www.npic.orst.edu or directly to EPA at: beekill@epa.gov

DIRECTIONS FOR USE

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

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.

See individual sites for specific pollinator protection application restrictions. If none exist under the specific site, for outdoor foliar applications, follow these application directions.



Do not apply Imidacloprid 75% WSP Turf Insecticide while bees are foraging. Do not apply Imidacloprid 75% WSP Turf Insecticide to plants that are flowering. Only apply after all flower petals have fallen off.

RESTRICTION: NOT FOR USE IN COMMERCIAL GREENHOUSES, NURSERIES, ON GRASSES GROWN FOR SEED, OR ON COMMERCIAL FRUIT AND NUT TREES. NOT FOR ANY CROP FOR RESALE.

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 pesticide. 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 the 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 product is applied by drenching, 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

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms (including sod farms), forests, nurseries and greenhouses.

Keep children and pets off treated areas until dry.

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. Exposure to moisture or excessive handling of water soluble packets may cause breakage.

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

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Dispose of outer bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure or accident, call CHEMTREC 1-800-424-9300.

SPRAY DRIFT MANAGEMENT

The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator is responsible for considering all of these factors when making application decisions. <u>Avoiding spray drift is the responsibility of the applicator.</u>

No-Spray Zone Requirements for Foliar Applications

Do not apply by ground within 25 feet, or by air within 150 feet of lakes; reservoirs; rivers; permanent streams, marshes or natural ponds; estuaries and commercial fish farm ponds.

Mixing and Loading Requirements

To avoid potential contamination of groundwater, the use of a properly designed and maintained containment pad for mixing and loading of any pesticide into application equipment is recommended. If containment pad is not used, maintain a minimum distance of 25 feet between mixing and loading areas and potential surface to groundwater conduits such as field sumps, uncased well heads, sinkholes, or field drains.

Aerial Applications

The spray boom should be mounted on the aircraft so as to minimize the drift caused by wing tip vortices. The minimum practical boom length should be used, and must not exceed 75% of the wing span or rotor diameter.

Importance of Droplet Size

An important factor influencing drift is droplet size. Small droplets (<150-200 microns) drift to a greater extent than large droplets. Within typical equipment specifications, applications should be made to deliver the largest droplet spectrum that provides sufficient control and coverage. Formation of very small droplets may be minimized by appropriate nozzle selection.

Wind Speed Restrictions

Drift potential increases at wind speeds of less than 3 mph (due to inversion potential) or more than 10 mph. However, many factors, including droplet size, canopy and equipment specifications determine drift potential at any give wind speed. Do not apply when winds are greater than 15 mph and avoid gusty and windless conditions. Risk of exposure to sensitive aquatic areas can be reduced by avoiding applications when wind direction is toward the aquatic area.

Restrictions During Temperature Inversions

Because the potential for spray drift is high during temperature inversions, do NOT make aerial or ground applications during temperature inversions. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however if fog is not present, inversions can also be identified by the movement of smoke from a ground source. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical mixing.

RUNOFF MANAGEMENT

Do not cultivate within 10 feet of the aquatic areas to allow growth of vegetative filter strip. When used on erodible soils, best management practices for minimizing runoff should be employed. Consult your local Natural Resources Conservation Service for recommendations in your use area.

ENDANGERED SPECIES NOTICE

Under the Endangered Species Act, it is a Federal Offense to use any pesticide in a manner that results in the death of a member of an endangered species. Consult your local county bulletin, County Extension Agent, or Pesticide State Lead Agency for information concerning endangered species in your area.

RESISTANCE MANAGEMENT

Some insects are known to develop resistance to insecticides after repeated use. As with any insecticide, the use of this product should conform to resistance management strategies established for the use area.

Imidacloprid 75% WSP Turf Insecticide contains a Group 4A insecticide called imidacloprid. Insect biotypes with acquired or inherent tolerance to Group 4A products may eventually dominate the insect population if Group 4A products are used

repeatedly as the predominant method of control for targeted species. This may eventually result in partial or total loss of control of those species by Imidacloprid 75% WSP Turf Insecticide and to other Group 4A products.

The active ingredient in Imidacloprid 75% WSP Turf Insecticide is a member of the neonicotinoid chemical group. Avoid using a block of more than three consecutive applications of Imidacloprid 75% WSP Turf Insecticide and/or other Group 4A products having the same or similar mode of action. Following a neonicotinoid block of treatments, Etigra LLC strongly encourages the rotation to a block of applications with effective products of a different mode before using additional applications of neonicotinoid products. Using a block rotation or windowed approach, along with other IPM practices, is considered an effective use strategy for preventing or delaying an insect pest's ability to develop resistance to this class of chemistry.

Foliar applications of Imidacloprid 75% WSP Turf Insecticide or other Group 4A products from the neonicotinoid chemical class should not be used on crops previously treated with a long-residual, soil-applied products from the neonicotinoid chemical class.

Other Group 4A, neonicotinoid products used as foliar treatments include: Actara[®], Assail[®], Calypso[®], Centric[®], Intruder[™], Leverage[®], Provado[®], and Trimax[™]. Other 4A Group, neonicotinoid products used as soil treatment include: Admire[®] and Platinum[®].

Contact your local extension specialist, certified crop advisor and/or product manufacturer for additional insect resistance management recommendations. Also, for more information on Insect Resistance Management (IRM), visit the Insecticide Resistance Action Committee (IRAC) on the web at http://irac-online.org/.

MIXING AND APPLICATION INSTRUCTIONS

Inside each foil pouch is a clear, water soluble inner packet containing the Imidacloprid 75% WSP Turf Insecticide. To prepare a solution, remove the outer foil pouch and drop the required number of unopened clear water soluble packets into the spray tank while filling with water to the desired level. Be sure to agitate while mixing and depending on the amount of agitation and the water temperature, the packets should completely dissolve within a few minutes of being added to the water. Note that cooler water temperatures increase the time needed for the inner packet to completely dissolve. 1 packet contains 1.6 oz. of this product (1.2 oz. or 0.075 lb. Al)

Mixing Precautions:

- Do NOT allow packets to become wet prior to adding to the tank.
- Do NOT handle the clean inner packets with wet hands or wet gloves.
- Do NOT use this product in a tank-mix with products that contain Boron or release free chlorine. Combining these products will result in a plastic that is not soluble in water or solvents (such as diesel oils, kerosene, gasoline or alcohol). NOTE: Chlorinated water may be used.
- Because the water soluble packets are not soluble in petroleum-based liquids, do NOT attempt to use Imidacloprid 75% WSP Turf Insecticide water soluble packets directly in diesel oils or summer spray type oils such as those used in ULV or LV applications.
- Rough handling of the packets may cause breakage.
- Reseal outer carton to protect remaining packets.

Tank Mixes: Imidacloprid 75% WSP Turf Insecticide has been found to be compatible with commonly used liquid fertilizers, fungicides and insecticides. If Imidacloprid 75% WSP Turf Insecticide is not known to be compatible with your particular tank mix partners, compatibility should be checked using the correct proportion of products in the following small jar test:

- 1) Add proportionate amount of each ingredient in the appropriate order to a pint or a quart jar;
- 2) Cap and shake for 5 minutes:
- 3) Let set for 5 minutes.

Poor mixing or formation of precipitates that do not readily re-disperse indicates an incompatible mixture that should not be used. For further information, contact your local Etigra, LLC representative.

Mixing Instructions: The enclosed packets containing Imidacloprid 75% WSP Turf Insecticide are water-soluble and will completely dissolve in water. The proper mixing procedure for Imidacloprid-75% WSP Turf Insecticide alone or in tank mix combinations with other pesticides is:

1. Fill the spray tank 1/4 to 1/3 full with clean water.

- 2. While recirculating and with the agitator running, add the required number of unopened Imidacloprid 75% WSP Turf Insecticide packets.
- 3. The packets should completely dissolve in 5 to 10 minutes; allow sufficient time for thorough mixing.
- 4. Continue to fill spray tank with water until ½ full.
- 5. If applicable, add remaining tank mix components in the following order: wettable powders, flowables, and emulsifiable concentrates. Ensure good agitation as each component is added. Do not add a tank mix component until the previous component is thoroughly mixed.
- 6. Fill spray tank to desired level and maintain constant agitation to ensure uniformity of spray mixture.

RESTRICTIONS FOR ALL USES

- · Keep people and pets off treated areas until dry.
- Do NOT apply through any type of irrigation system.
- Do NOT apply by air. Do NOT graze treated areas or use clippings from treated areas for feed or forage.
- Do NOT apply Imidacloprid 75% WSP Turf Insecticide to soils that are waterlogged or saturated and avoid runoff or puddling of irrigation water following application.
- Do NOT allow lechate to run out for the first 10 days after application or reduced efficacy may result.
- Do NOT exceed a total of 8.53 oz. / Acre per year (0.4 lb. Al/A). 1 packet contains 1.6 oz. of this product (1.2 oz. or 0.075 lb. Al).
- Not for use in commercial greenhouses, nurseries, on grasses grown for seed, or on commercial fruit and nut trees. Not for any crop for resale.
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species.

TURFGRASS

Imidacloprid 75% WSP Turf Insecticide will control soil-inhabiting pests in grassy areas such as home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, and athletic fields and sod farms. The need for an application can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. Applications may be made preceding the egg laying activity of the target pests and high levels of control may be achieved when applications are made proceeding or during the egg laying period. For best results, make applications prior to egg hatch of the target pests, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

Restrictions:

- Applications must NOT exceed a total of 8.53 oz. (0.4 lb of active ingredient) per acre per year.
- Applications must NOT be made when grassy areas are waterlogged or the soil is saturated with water because adequate distribution of the active ingredient cannot be achieved when these conditions exist.

Use Precautions:

- The treated grassy area must be in such a condition that the rainfall or irrigation will penetrate vertically in the soil profile.
- Do NOT mow treated areas until after sufficient rainfall or irrigation has occurred in order to maintain the uniformity of the application.

Application Instructions:

Apply Imidacloprid 75% WSP Turf Insecticide in sufficient water to provide adequate distribution in the treated area. Use of accurately calibrated equipment normally used for soil application of insecticides is required. Use equipment that will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off-target drift. Check calibration periodically to ensure that equipment is working properly.

Pest	Application Rate	Specific Instructions
Larvae of: Annual bluegrass weevil Asiatic garden beetle Billbugs Black turfgrass ataenius Cutworms† European Chafer Green June beetle Japanese beetle Northern masked chafer Oriental beetle Phyllophaga spp. Southern masked chafer	1.6 oz. (1 packet) per 8,250 - 11,000 sq. ft.	Grubs, European Crane Fly, billbugs and annual bluegrass weevil: For best results make applications prior to egg hatch of the target pest. Cinchbugs: Make applications prior to the hatching of the first instar nymphs. Mole Crickets: Make applications prior to or during the peak egg hatching period. When adults or large nymphs are present and actively tunneling, Imidacloprid 75% WSP Turf Insecticide should be accompanied by a curative insecticide. NOTE: For best results, the active ingredient must be moved through the thatch by irrigation or rainfall occurring within 24 hours after application.
Cinchbugs [†] Mole Crickets	1.6 oz. (1 packet) per 8,250 sq ft	

ORNAMENTALS, GROUNDCOVERS AND INTERIOR PLANTSCAPES

Imidacloprid 75% WSP Turf Insecticide is a systemic insecticide that may be applied to ornamentals, groundcovers and interior plantscapes in and around industrial and commercial buildings and residential areas. The insecticide is translocated upward into the plant system and for best results must be placed where the growing portions of the target plant can absorb the active ingredient. When applicable, adding a fertilizer containing nitrogen into the spray solution may enhance plant uptake of Imidacloprid 75% WSP Turf Insecticide.

Rotational Crops:

As soon as practical following the last application, 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. For crops not listed on an imidacloprid label, or for crops for which no tolerances for the active ingredient have been established, a 12-month plant-back interval must be observed. NOTE: Cover crops for soil building or erosion control may be planted at any time, but do not graze or harvest for food or feed.

Ant Management Programs:

Imidacloprid 75% WSP Turf Insecticide may be used to limit the honeydew available as a food source for ant populations when controlling aphids, scale insects, mealy bugs and other sucking pests on ornamentals. Imidacloprid 75% WSP Turf Insecticide applications may be supplemented with bait traps, residual sprays and other methods to further reduce the unwanted ant population.

Insect Resistance:

Some insects are known to develop resistance to insecticides after repeated use. As with any insecticide, the use of this product should conform to resistance management strategies established for the use area. Consult your Cooperative Extension Service for resistance management strategies and recommended pest management practices for your area.

Woody Perennials:

Protection in woody perennials is slower than in herbaceous species and a delay of 2 or more weeks should be expected, with longer delays for larger plants. Because of this, applications to woody perennials should be made well in advance of expected insect activity.

Bark Media:

Imidacloprid 75% WSP Turf Insecticide treatments to media with 30 - 50% or more bark content may confer a shorter period of protection.

FOLIAR AND BROADCAST APPLICATIONS TO OUTDOOR ORNAMENTALS IN RESIDENTAL AND COMMERCIAL AREAS AND INTERIOR PLANTSCAPES

Imidacloprid 75% WSP Turf Insecticide may be applied as a broadcast or foliar application to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes.

Application Instructions:

Apply Imidacloprid 75% WSP Turf Insecticide in sufficient water to provide adequate distribution in the treated area. Use of accurately calibrated equipment normally used for soil application of insecticides is required. Use equipment which will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off-target drift. Check calibration periodically to ensure that equipment is working properly.

NOTE: When making foliar applications to plants with hard-to-wet foliage such as holly, pine or ivy, use of a spreader / sticker is recommended.

Restrictions:

- Applications must NOT exceed a total of 8.53 oz. (0.4 lb of active ingredient) per acre per year.
- Do not consume fruits or nuts from treated trees for 1 year (365 days) from treatment.
- Do not apply this product, by any application method, to linden, basswood or other Tilia species.

Pest	Application Method	Application Rate	Specific Instructions
Adelgids Aphids Japanese beetle (adult) Lacebugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Leafminers Mealybugs Sawfly larvae Thrips† Whiteflies	Foliar	1.6 oz. (1 packet) per 300 gal. of water	Make applications prior to establishment of large pest populations and retreat as necessary. NOTE: Applying Imidacloprid 75% WSP Turf Insecticide foliarly after a soil application in the same crop is not recommended for resistance management purposes.
White grub larvae (such as Japanese beetle larvae, chafers, Phyllophaga spp., Asiatic garden beetle and Oriental beetle)	Broadcast	1.6 oz. (1 packet) per 11,000 sq. ft.	Mix the specified amount of Imidacloprid 75% WSP Turf Insecticide in sufficient water to uniformly cover the area being treated using at least 2 gallons of water per 1000 sq. ft. For best results, incorporate the Imidacloprid 75% WSP Turf Insecticide into the upper soil profile by irrigating after the application is made.

SOIL INJECTION AND DRENCH APPLICATIONS

Restrictions:

• Applications must NOT exceed a total of 8.53 oz. (0.4 lb of active ingredient) per acre per year.

Application Site	Application Rate	Application Instructions	Pests Controlled
		SOIL INJECTION – No Soil Injection Application allowed in Nassau or Suffolk counties of New York.	
		GRID SYSTEM: Holes should be spaced on 2.5 ft centers, in a grid pattern, extending to the drip line of the tree.	
Trees NOTE: Application		CIRCLE SYSTEM: Apply in holes evenly spaced in circles, (use more than one circle dependent upon the size of the tree) extending in from the drip line of the tree.	Adelgids Aphids
to trees already heavily infested may	1.6 oz. (1 packet) per 24 – 48 inches of	BASAL SYSTEM: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base.	Armored Scale [†] Black vine weevil larvae
not prevent the eventual loss of the trees due to existing pest damage and tree stress.	cumulative trunk diameter (DBH)	Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. For optimum control, keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per tree.	Eucalyptus Longhorned Borers Flatheaded Borers (including bronze birch and alder borers) Japanese Beetles (adults)
		SOIL DRENCH : Remove plastic or any other barrier that will stop solution from reaching the root zone. Uniformly apply around the base of the tree, direct to the root zone as a drench in no less than 10 gallons of water per 1000 square feet.	Lacebugs Leaf Beetles (including eln and viburnum leaf beetles) Leafhoppers (including
		SOIL INJECTION - No Soil Injection Application allowed in Nassau or Suffolk counties of New York.	glassy-winged sharpshooter)
Shrubs	1.6 oz. (1 packet) per 24 – 48 inches of cumulative shrub	Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Using a minimum of 4 holes per shrub, apply to individual plants maintaining a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. Keep the treated area moist for 7 to 10 days.	Leafminers Mealybugs Pine Tip Moth larvae Psyllids Royal Palm Bugs Sawfly larvae Soft Scales
	height	SOIL DRENCH: Remove plastic or any other barrier that will stop solution from reaching the root zone. Uniformly apply around the base of the tree, direct to the root zone as a drench in no less than 10 gallons of water per 1000 square feet.	Thrips [†] White grub larvae Whiteflies
Flowers and Ground Cover	1.6 oz. (1 packet) per 8,250 to 11,000 sq ft.	Apply as a broadcast treatment and incorporate into the soil before planting or apply after plants are established. If application is made to established plants, optimum control will be attained if area is irrigated thoroughly after application.	

POME FRUIT IN AND AROUND RESIDENTIAL AREAS

₹pple,	Crabapple,	Loquat,	Mayhaw,	Pear	(including (Oriental	pear)	Quince
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- Pre-Harvest Interval (PHI): 7 days
- Reapplication Interval: At least 10 days
- Maximum Applications per Year: 5
- Applications must NOT exceed a total of 8.53 oz. of this product (0.4 lb of active ingredient) per acre per year.

Pest	Ounces per 300 gal. of Water	Ounces per Acre [‡]	Specific Instructions
Aphids (except Wooly apple aphid) Leafhoppers (including glassy-winged sharpshooter) Leafminer Mealybugs [†] San Jose Scale [†]	1.6 (1 packet)	2.1	Apply as a foliar spray as needed after petal-fall is complete. Rosy Apple Aphid: Apply prior to leaf rolling caused by the pest. Leafhopper: For late season (preharvest) control, apply while most leafhoppers are in the nymphal stage. Leafminer: Make first application as soon as petal-fall is complete for control of first generation, with best results occurring when the application is made at the earliest possible time. For succeeding generations, best results occur when applications are made early in the adult flight against egg and early instar larvae. If generations are overlapping or severe pressure continues, a second application may be necessary after 10 days. A single application may result in suppression only. NOTE: Imidacloprid 75% WSP Turf Insecticide will not control late stage larvae. Mealybug: For best results be sure to have good spray coverage of the trunk and scaffolding limbs or other nesting sites. San Jose Scale: Time applications to the crawler stage and treat each generation.

Not permitted for control on pears in California.

PECANS IN AND AROUND RESIDENTIAL AREAS

NOT PERMITTED IN CALIFORNIA unless otherwise directed by state-specific 24(c) labeling

- Pre-Harvest Interval (PHI): 7 days
- Reapplication Interval: At least 10 days
- Maximum Applications per Year: 3
- Maximum Imidacloprid 75% WSP Turf Insecticide allowed per Year: 6.3 oz. / Acre

Pest	Ounces per 300 gal. of Water	Ounces per Acre [‡]	Specific Instructions
Yellow pecan aphid Black margined aphid Pecan leaf phylloxera Pecan spittlebug Pecan stem phylloxera	1.6 (1 packet)	2.1	Apply as a foliar spray as pest pressure builds but before infestation is extremely heavy. Two applications at a 10 – 14 day interval may be required to achieve control. For best results, thorough and uniform coverage is necessary. Coverage may be improved through the use of an organosilicone-based spray adjuvant.

The amount of Imidacloprid 75% WSP Turf Insecticide required per acre depends on tree size and volume of foliage. The listed rate per acre is based on a standard of 400 gallons of dilute spray per acre for large trees.

[‡] The amount of Imidacloprid 75% WSP Turf Insecticide required per acre depends on tree size and volume of foliage. The listed rate per acre is based on a standard of 400 gallons of dilute spray per acre for large trees.

ORNAMENTAL GRAPES IN RESIDENTIAL AND INDUSTRIAL AREAS

- Reapplication Interval: At least 14 days
- Maximum Imidacloprid 75% WSP Turf Insecticide allowed per Year: 2.0 oz. / Acre
- Applications may be applied up to and including day of harvest.

Pest	Ounces per 300 gal. of Water	Ounces per Acre [‡]	Specific Instructions	
eafhoppers (including glassy-winged sharpshooter) ealybugs	1.6 (1 packet)	1.0	Apply as a foliar spray using 200 gallons of water per acre.	

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