



U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division (H7505C)  
401 "M" St., S.W.  
Washington, D.C. 20460

NOTICE OF PESTICIDE:  
  X   Registration  
      Reregistration

(under FIFRA, as amended)

EPA Reg.  
Number:

3125-416

Date of Issuance:

MAR 18 1994

Term of Issuance:

Conditional, Expires:  
September 30, 1998

Name of Pesticide Product:

Merit 0.62% Granular

Name and Address of Registrant (include ZIP Code):

Miles Inc.  
P.O. Box 4913  
8400 Hawthorn Road  
Kansas City, MO 64120-0013

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistration under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(C) provided that you:

1. Submit data required to change this registration to an unconditional FIFRA section 3(c)(5) registration. The required data with deadlines for submitting the required data are listed on the second page of this notice of Pesticide Registration.

2. Make the following label changes:

a) Add the phrase, "EPA Registration No. 3125-416" to your label before you release the product for shipment.

b) This product is not recommended for turf use therefore, delete the statement: "...or on sod farms."

Signature of Approving Official: **DENNIS H. EDWARDS**  
Dennis H. Edwards, Product Manager (19)  
Insecticide Branch Rodenticide Branch  
Registration Division (H7505C)

Date:

MAR 18 1994

3. Submit five (5) copies of your final printed labeling, with the changes referred to above, before you release the product for shipment.

Required Data and Deadlines for Submissions of Data:

Toxicology

1. You must submit acute and subchronic neurotoxicity testing. These studies must be received by the Agency by June 30, 1994.

Environmental Fate

2. The submitted validated analytical methods for the determination of Imidacloprid and degradates of toxicological concern in ground and surface water samples must be acceptable or Miles must make appropriate corrections/additions and resubmit the analytical method within 6 months after notification.

Ecological Effect

3. Submit a new mallard reproduction study to establish the NOEC for eggshell thickness. This study must be received by the Agency by November 30, 1994.

4. Conduct a baseline field monitoring study to locate suitable sites and avian species (a species that would have high exposure to NTN on turf during the nesting reproduction period of this species). This study must be received by the Agency by November 30, 1994.

5. Once the appropriate avian species has been identified, you must demonstrate that this species has reasonable sensitivity in order to be used as an indicator species, ie shows reproductive impairment at levels that can expected to be found in the environment. These studies must be received by the Agency by December 30, 1995.

6. You must submit an acceptable avian reproduction monitoring study with the appropriate species. The study should be at least 2 years in length (2 full nesting seasons). This study must be submitted by December 31, 1997.

7. An annual progress report of the monitoring study must be submitted by September 30, of each year during the period this product is conditionally registered.

If these conditions are not complied with, the registration will be subject to can cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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EPA Reg. No. 3125-416

A stamped copy of the label is enclosed for your records.

Sincerely,

**DENNIS H. EDWARDS**

Dennis H. Edwards, Jr.  
Product Manager 19  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)

Enclosure

MERIT 0.62% Granular

URA-8127.YLD

U.S. LABEL

Base Pre-Reg. (8127)

Reason to Issue: To submit final

language to EPA based on their 01/27/94 letter.

Date of Draft: 02/22/94(Pre-Reg)(C)

Supersedes Pre-Reg Drafts Dated: 06/24/93

11/09/93 and 12/15/93

# MERIT 0.62%

## Granular Systemic Insecticide

### FOR INSECT CONTROL IN ORNAMENTALS

#### ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine ..... 0.62%

INERT INGREDIENTS ..... 99.38%  
100.00%

EPA File Symbol No. 3125-URA

NET CONTENTS: \_\_\_\_ Ounces

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

STOP - READ THE LABEL BEFORE USE

MAR 18 1994

KEEP OUT OF REACH OF CHILDREN

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

3125-416

### CAUTION

(See Rear Panel for Statements of Practical Treatment and Other Precautionary Statements)

### AVISO

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

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

MILES 

## GENERAL INFORMATION

### ORNAMENTAL PLANTS

MERIT 0.62% Granular Insecticide can be used as a broadcast application on ornamentals in commercial and residential landscapes and interior and—exterior plantscapes. MERIT 0.62% Granular Insecticide is a systemic product and will be translocated upward within the plant system. Optimum control will be achieved when applications are followed by sufficient mechanical incorporation, irrigation or rainfall to move the active ingredient into the soil.

When making soil applications to plants with woody stems, systemic activity is delayed until the active ingredient is translocated throughout the plant. In some trees, this translocation delay can take up to 60 days. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control.

Applications of MERIT 0.62% Granular Insecticide cannot exceed a total of 80 ~~65~~ lb (0.5 ~~0.4~~ lb of active ingredient) per year.

### APPLICATION EQUIPMENT

Apply MERIT 0.62% Granular Systemic Insecticide uniformly over the area being treated with typical granular application equipment. Both drop-type and rotary-type spreaders may be used to apply MERIT 0.62% Granular Systemic Insecticide. Avoid the use of spreaders which would apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately.

### SPREADER SETTINGS FOR MERIT 0.62% GRANULAR SYSTEMIC INSECTICIDE

The following chart can be used as a guide in establishing an accurate rate of MERIT 0.62% Granular Systemic Insecticide. Application rates will vary dependent upon equipment wear and condition of spreader. Carefully calibrate all the equipment used prior to commercial use of this product.

(Chart to come)

NOTE: Not for use in commercial greenhouses, and nurseries, or on sod farms.

### RECOMMENDED APPLICATIONS FOR USE ON ORNAMENTALS

For use only in and around industrial and commercial buildings and residential areas (including trees, shrubs, evergreens, flowers, foliage plants, ground covers, and interior plantscapes).

### THE FOLLOWING USE PATTERNS WILL CONTROL THE PESTS LISTED BELOW

Adelgids, Aphids, Lacebugs, Leafhoppers, Leafminers, Mealybugs, Scale insects, Thrips, Whiteflies, Pine Tip moth larvae, Elm Leaf beetle, Japanese beetle, and White grub larvae (including Japanese beetle, Oriental beetle, Northern masked chafer, Southern masked chafer, European chafer, Asiatic garden beetle, and *Phyllophaga* spp).

#### DOSAGE MERIT 0.62% G

0.9 to 4.8 ~~1.5~~ lb  
per 1000 sq ft

#### REMARKS

Apply as a broadcast treatment. Prior to application, remove black plastic or other weed barrier material that will not permit water permeability.

NOTE: For optimum control mechanical incorporation, irrigation or rainfall should occur within 24 hours after application to move the active ingredient into the soil.

Refer to label sections on application equipment and spreader settings.

SEE GENERAL INFORMATION

## RESTRICTIONS

Avoid runoff or puddling of irrigation water following application. Avoid application of MERIT 0.62% Granular Systemic Insecticide to areas which are water-logged or saturated, which will not allow penetration into the root

zone of the plant. Do not apply more than 80 ~~65~~ lb (0.5 ~~0.4~~ lb of active ingredient) per acre per year. Do not plant any food crop within one year of a treatment with MERIT 0.62% Granular Systemic Insecticide.