



003125-00525-041999

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Systems Integration Group, Inc.

PM04

3125-525

4/14/99

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U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7506C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg. Number:

3125-525

Date of Issuance:

APR 19 1999

NOTICE OF PESTICIDE:

X Registration

Term of Issuance: Conditional

Name of Pesticide Product:

Imagel Insect Bait

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Bayer Corporation
Agriculture Division
8400 Hawthorn Road
P.O. Box 4913
Kansas City, MO 64120-0013
Attn: Charles W. Boyd

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/reregistered 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)(A) provided that you:

1. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. Modify your proposed label submitted August 13, 1998 as indicated below before you release the product for shipment.
 - a. On the front panel, under the Ingredients Statement, add the EPA Registration Number ("EPA Reg. No. 3125-525") and a statement of net weight/contents.

continued on p.2

Signature of Approving Official:

Date:

APR 19 1999

- b. On the front panel under "DIRECTIONS FOR USE", move the entire disclaimer statement, beginning with "CONDITIONS OF SALE:" to the end of the label on the back panel. The disclaimer statement does not belong in the "DIRECTIONS FOR USE."
- c. Under "DIRECTIONS FOR USE," the subsection headings "GENERAL INFORMATION," "SPOT OR CRACK AND CREVICE APPLICATIONS," "FOOD/FEED HANDLING ESTABLISHMENT APPLICATIONS," "INDOOR PEST CONTROL," and "OUTDOOR PEST CONTROL" should be left justified so that it is clear that these are subheadings under the general heading "DIRECTIONS FOR USE."
- d. Under "GENERAL INFORMATION," in the third sentence delete "agricultural structures (e.g. barns, livestock housing facilities)". In addition, at the end of paragraph under "GENERAL INFORMATION," add the following statement:

"NOT FOR USE IN USDA-INSPECTED MEAT AND POULTRY FACILITIES."

The use site "agricultural structures" could be interpreted to include meat and poultry facilities. Any label claims for use in federally inspected meat and poultry plants must be approved by USDA before the label can be accepted by EPA.

- e. Under "SPOT OR CRACK AND CREVICE APPLICATIONS," at the end of the last paragraph add the following statement: "Do not use this product in or on electrical equipment where a possibility of shock hazard exists."
 - f. Under "FOOD/FEED HANDLING ESTABLISHMENT APPLICATIONS," the last sentence of the paragraph should be emphasized by changing the entire sentence to bold typeface and capital letters: **"APPLICATION OF THIS PRODUCT IN FOOD/FEED AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS OTHER THAN AS A CRACK AND CREVICE TREATMENT IS NOT PERMITTED."**
 - g. On page 3 of your proposed label, under "STORAGE AND DISPOSAL," add the word "STORAGE:" at the beginning of the last paragraph, before "Store in a cool, dry place..." Also, in the fourth sentence of the same paragraph, change "carefully sweep material into a pile" to "carefully remove spilled gel and wash exposed area."
3. Please submit two copies of your revised final printed labeling before you release the product for shipment.
 4. The acute toxicity studies and product chemistry data you submitted August 13, 1998 and the additional product chemistry provided December 18, 1998, have been reviewed and are considered acceptable. The requirement for an acute inhalation toxicity study for this product has been waived. The acute toxicity and product chemistry database for your product is considered complete. A copy of each review is enclosed for your records.

If the above specified conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact me at (703) 305-5417 or via E-mail at Perreault.Peg@epa.gov.

Sincerely yours,



Peg Perreault
Chemical Manager, Team 4
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosures (4)

Imagel Insect Bait

XXX-9175.YLD

U. S. Label

Base Pre-Reg (9175)

Reason to Issue: Revised based on internal comments.

Date of Pre-Reg Draft: 08/07/98 (B)

Imagel Insect Bait

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N nitro-2-imidazolidinimine 2.15%

INERT INGREDIENTS 97.85%

100.00%

ACCEPTED

with COMMENTS STOP - Read The Label Before Use
in EPA Letter Dated April 19, 1999
KEEP OUT OF REACH OF CHILDREN

Under the Federal Insecticide
Fungicide, and Rodenticide Act,
it is unlawful for the manufacture,
distribution, sale, or use of any
pesticide which does not bear the
following statement in English:

3125-525

CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation.
Avoid contact with eyes or clothing. Wash

thoroughly with soap and water after handling.

FIRST AID

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger, or, if available, by administering syrup of ipecac. If syrup of ipecac is available, administer 1 tablespoonful (15mL) of syrup of ipecac followed

by 1 to 2 glasses of water. If vomiting does not occur within 20 minutes, repeat the dose once. Do not induce vomiting or give anything by mouth to an unconscious person. **If in eyes,** flush eyes with plenty of water. Call a physician if irritation persists.

DIRECTIONS FOR USE

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

IMPORTANT: Read these entire DIRECTIONS FOR USE, before using IMAGEL INSECT BAIT.

CONDITIONS OF SALE: THE DIRECTIONS ON THIS LABEL WERE DETERMINED THROUGH RESEARCH TO BE APPROPRIATE FOR THE CORRECT USE OF THIS PRODUCT. THIS PRODUCT HAS BEEN TESTED UNDER DIFFERENT ENVIRONMENTAL CONDITIONS BOTH INDOORS AND OUTDOORS UNDER CONDITIONS SIMILAR TO THOSE THAT ARE ORDINARY AND CUSTOMARY WHERE THE PRODUCT IS TO BE USED. INSUFFICIENT

CONTROL OF PESTS MAY RESULT FROM THE OCCURRENCE OF EXTRAORDINARY OR UNUSUAL CONDITIONS, OR FROM FAILURE TO FOLLOW LABEL DIRECTIONS. IN ADDITION, FAILURE TO FOLLOW LABEL DIRECTIONS MAY CAUSE INJURY TO ANIMALS, MAN, AND DAMAGE TO THE ENVIRONMENT. BAYER OFFERS, AND THE BUYER ACCEPTS AND USES, THIS PRODUCT SUBJECT TO THE CONDITIONS THAT EXTRAORDINARY OR UNUSUAL ENVIRONMENTAL CONDITIONS, OR FAILURE TO FOLLOW LABEL DIRECTIONS ARE BEYOND THE CONTROL OF BAYER AND ARE, THEREFORE, THE RESPONSIBILITY OF THE BUYER.

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GENERAL INFORMATION

IMAGEL INSECT BAIT is intended for the control of cockroaches, including German, American, smokeybrown, Oriental and other cockroach species. Apply as a spot and/or crack and crevice application to spaces within structures, their walls and ceilings (both inside and out), and the immediate adjacent surrounding grounds. Such structures include, but are not limited to, residential (e.g. houses,

apartments), commercial, industrial, and institutional buildings (e.g. restaurants, supermarkets, offices, hospitals, nursing homes, schools, warehouses, hotels, motels and utilities), agricultural structures (e.g. barns, livestock housing facilities), pet kennels, zoos, and on various modes of transport (e.g. aircraft, buses, trucks, trailers, rail cars, and marine vessels).

SPOT OR CRACK AND CREVICE APPLICATIONS

Spot treatments: IMAGEL INSECT BAIT should be applied as spots or droplets of approximately 4 to 6 mm in diameter. Approximately 10 droplets per 100 sq. ft. is recommended for use under conditions with low to moderate insect infestations. Approximately 20 droplets per 100 sq. ft. is recommended for more severe infestations or where the population occurs in inaccessible locations, such as in wall voids. Under most circumstances, more numerous, smaller bait placements will provide faster and more effective control than fewer large placements.

Crack and Crevice Treatments: IMAGEL INSECT BAIT may also be applied as a bead or thin film where appropriate. Bait should be applied into cracks and crevices in which insects hide or through which they may enter the building. Such openings commonly occur at expansion joints, between different elements of construction, between, behind or under various types of equipment such as cabinets, refrigerators,

sinks, stoves, dishwashers, and through floors, doors, windows, walls and ceilings. These openings may lead to voids such as hollow walls, hollow equipment legs and bases, utility entrances, electrical conduit, junction and switch boxes, and wall and floor drain exits. Trapping techniques or spot flushings will aid in determining areas with insect activity.

Apply IMAGEL INSECT BAIT by placing the applicator tip directly into cracks and crevices and other openings or voids where insects may hide or harbor and deposit the bait as multiple spots or as a continuous bead. Care should be taken to avoid depositing the product onto open or exposed surfaces. During follow up visits, inspect bait placements and reapply as needed. If bait is completely consumed, reapply in the same location, as many insects (such as cockroaches) leave behind secretions and droppings to attract other insects to harborages and food sources.

FOOD / FEED HANDLING ESTABLISHMENT APPLICATIONS

Application within food/feed areas of food/feed handling establishments is limited to crack and crevice treatment only. Apply with syringe applicator directly into cracks and crevices. Place applicator tip 1/2 inch into cracks, crevices, holes and other small openings where roaches may be a problem. Apply small amounts of gel (up to 1/2 gram) per spot. Do not apply bait to areas where food/feed, food utensils or food processing surfaces may become contaminated. Do not apply bait to areas that are routinely washed such as cracks and crevices in tops of tables, food/feed preparation and prepared food holding surfaces as bait may be removed by washing. Do not apply bait to surfaces where the temperature exceeds 130°F as bait may run. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers and hot water pipes. Care should be taken to avoid depositing gel onto exposed surfaces. If gel

contacts an exposed surface, remove gel and wash exposed surface. Food/feed areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing edible waste storage, and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas are also considered a food/feed area when food is exposed and facility is in operation. Apply bait in small amounts between different elements of construction, between equipment and floors, openings leading into voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, behind and under refrigerator, cabinets, sinks, closets, stoves and other equipment where cockroaches hide. During follow-up visits inspect bait placements and reapply when necessary. Application of this product in food/feed areas of food/feed handling establishments other than as a crack and crevice treatment is not permitted.

INDOOR PEST CONTROL

For indoor uses, make applications in a manner as previously described above under "Spot or Crack and Crevice Applications." Particular attention should be given to treating entry points and harborage areas. Place the applicator tip into cracks, crevices, voids, holes and other small openings where insects may hide. Apply small amounts of bait (up to

1/2 gram/spot) or as a bead or film at insect activity sites. Cleaning of all areas prior to use of IMAGEL INSECT BAIT will increase levels of control. Any foodstuffs infested with insect pests should be removed and destroyed. Applications to furniture should be restricted to those areas where contact to humans will not occur. Applications to textiles or fabrics

may cause discoloration or staining.

OUTDOOR PEST CONTROL

Apply IMAGEL INSECT BAIT as a spot, bead or thin film to outside surfaces of buildings, porches, patios, door and window openings, crawl spaces, air conditioning units, utility entrances through outside walls, under siding / molding, in garages and other adjacent areas where pests have been seen or found. To help prevent infestations, treat areas adjacent to structures where pests may be active and may find nesting sites or harborage. Applications should be made

to substrates adjacent to buildings, the building foundations, wall voids, attic and soffit vents, expansion joints, around doors and windows, soffit areas, eaves, under stairways, around screens, on fences, trees and other areas conducive to infestation. Do not apply Imagel Insect Bait to areas that have been recently sprayed with insecticides, and do not spray insecticides over gel, as it may cause the bait to become repellent.

STORAGE AND DISPOSAL

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

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

Container Disposal: Wrap used cartridge in paper and place in trash.

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 or material is spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Dispose of pesticide as directed above. In spill or leak incidents, keep unauthorized people away. You may contact the Bayer Emergency Response Team for decontamination procedures or any other assistance that may be necessary. The Bayer Kansas City Emergency Response Telephone No. is 300-414-0244 or contact Chemtrec at 800-424-9300.