

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES**January 27, 2010**

**Julie Butcher, Registration Specialist**  
**Gowan Company**  
**P.O. Box 5569**  
**Yuma, AZ 85366-5569**

**Subject:** Label Amendment for the Agency's Interim Risk Mitigation for Phosmet Products  
**Product Name:** IMIDAN® 1-E Insecticide  
**EPA Reg. No.:** 10163-171  
**Application Dated:** March 30, 2007  
**Decision Number:** 325617

Dear Ms. Butcher:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below.

This label amendment reflects the Agency's interim risk reduction recommendations for phosmet. The Agency remains concerned, however, that the calculated margins of exposure for phosmet are low for some crops/uses at the labeled REIs. Although EPA is accepting the amended labels for phosmet products labeled for these uses at this time, the Agency will reassess the risks and agricultural benefits of phosmet uses as part of the registration review process, and may determine that additional mitigation measures, such as longer REIs, are needed.

Make the following label revisions:

1. Delete the word "industrial" from the statement below the product name to read "An Emulsifiable Concentrate for Agricultural Use Only".

Also, revise the descriptive statement as follows: "For the control of insects specified in the directions on deciduous shade trees, evergreens, ornamental flowering trees, shrubs and roses **ONLY** in commercial nurseries, Christmas tree farms, and conifer tree seed orchards."

2. Add a resistance management identifier "GROUP 1B INSECTICIDE" after the ingredient statement, and add an appropriate "**RESISTANCE MANAGEMENT**" statement within the **DIRECTIONS FOR USE**, following the guidelines of EPA Pesticide Registration Notice 2001-5. Such a statement should include information on development of pest resistance, recommendations for chemical rotation between different chemical classes, and information on how to report suspected instances of observed pesticide resistance to

local or state agricultural authorities.

- 3. Add the following statement below the statement of ingredients: "Contains petroleum distillate"

- 4. Based on toxicity rankings from the acute toxicity review, re-order the **FIRST AID** statements as follows:

**"FIRST AID**

Organophosphate

**IF SWALLOWED:** Immediately call a poison control center or doctor. Do not induce vomiting unless told to by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

**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.

**IF INHALED:** 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.

**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 five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-888-478-0798 for emergency medical treatment information."

Also, add the following to the **NOTE TO PHYSICIAN** statement: "This product may pose an aspiration pneumonia hazard. Contains petroleum distillate."

- 5. Revise the **HAZARDS TO HUMANS AND DOMESTIC ANIMALS** statement as follows:

**"WARNING-AVISO**

May be fatal if swallowed. Harmful if absorbed through skin or inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."

- 6. Revise the **PERSONAL PROTECTIVE EQUIPMENT (PPE)** statement by deleting references to dipping pine seedlings, as this use pattern is not labeled for this product. Revise as follows:

Revise the second bold heading to say **"Motorized ground equipment applicators not in an enclosed cab and handlers engaged in cleaning up a spill or leak, or cleaning or repairing contaminated equipment, must wear:"**

Also, delete all references to aerial applications, enclosed cockpits, etc. as this product is not for aerial application.

Also, in the fifth bulleted line of the “**Motorized ground equipment applicators . . .**” statement, delete “or applying as a pine seedling dip”

- 7. Revise the **ENGINEERING CONTROLS** statement by deleting the “**Engineering Controls for Aerial Applications**” statement, as this product is not for aerial application.
- 8. Revise the **ENVIRONMENTAL HAZARDS** statement by deleting the reference to aerial applications
- 9. Revise the **DIRECTIONS FOR USE** statement by replacing “Not for use in residential areas” with the following statement:

“Use in residential, park, or recreational areas is prohibited. Only for use in commercial nurseries, tree farms, and conifer tree seed orchards. Do not apply to forests or natural fallow or wooded areas. Only for application using ground-based hydraulic sprayers or mist blowers. Applications by air or chemigation are prohibited”

- 10. Add the following to the beginning of the **SPRAY DRIFT MANAGEMENT** statement:

“Do not allow spray to drift from the application site and contact people, structures people occupy at any time and the associated property, parks and recreation areas, nontarget crops, aquatic and wetland areas, woodlands, pastures, rangelands, or animals.”

Also, delete all references and statements referring to overhead chemigation and aerial applications

Also, revise the ‘**For airblast applications:**’ statement by deleting “when wind speed is 10 mph or less” and replacing with “when wind speed is 3 – 10 mph”.

Also add a **SPRAY DRIFT RESTRICTIONS** statement as follows:

**“SPRAY DRIFT RESTRICTIONS**

Do not apply this product in a manner inconsistent with the Best Management Practices summarized below.

- 1. Use the largest droplet size consistent with acceptable efficacy. Formation of very small droplets may be minimized by appropriate nozzle selection and by avoiding excessive spray boom pressure.
- 3. For ground boom applications, apply with nozzle height no more than 4 feet above the ground or crop canopy.
- 4. Make applications when the wind velocity favors on-target product deposition. Apply only when the wind speed is 3 to 10mph. Wind speed must be measured adjacent to the application site on the upwind side, immediately prior to application.
- 5. Do not make applications into areas of temperature inversions. Inversions are characterized by stable air and increasing temperatures with increasing distance above the ground. Mist or fog may indicate the presence of an inversion in humid areas. Where

permissible by local regulations, the applicator may detect the presence of an inversion by producing smoke and observing a smoke layer near the ground surface.

6. Low humidity and high temperatures increase the evaporation rate of spray droplets and therefore the likelihood of increased spray drift. Avoid spraying during conditions of low humidity and/or high temperatures.

7. All application equipment must be properly maintained and calibrated using appropriate carriers.

8. For airblast applications, turn off outward pointing nozzles at row ends and when spraying the outer two rows. Spray must be directed into the canopy.

9. For ground-boom, or airblast applications, do not apply within 25 feet of permanent water bodies (rivers, natural ponds, lakes, streams, reservoirs, marshes, estuaries, or commercial fish ponds).”

- 11. The **DILUTION DIRECTIONS** statement must clarify the differences between dilute and concentrate applications to avoid overuse. Revise as follows:

**“DILUTION DIRECTIONS**

The rate required for thorough, uniform coverage varies with plant growth at time of application. **Except as specified for certain uses**, the following rates are intended to cover a broad range of conditions. Mix well before using. Imidan 1-E is an emulsifiable liquid for use in water for spray applications. Combinations with other insecticides and fungicides have not been fully tested at this time. It is not compatible with alkaline materials such as lime or Bordeaux mixtures. Keep children and pets away from immediate areas while spraying. Do not apply during periods of abnormally high humidity. Do not exceed 3 quarts of Imidan 1-E per 100 gallons of water when making dilute applications. Do not apply more than 4 quarts of Imidan 1-E per acre under any application method.

**Dilute Application**

Apply specified rate in [100-400] gallons of water per acre, thoroughly wetting plants to the point of runoff.

**Concentrate Application**

Apply specified rate in [50-100] gallons of water per acre.”

Also, include a table specifying application rates per acre and application methods (i.e., dilute or concentrate) by each crop and target pest group formatted as follows:

Crop	Pest	Use Rate	Comments
<b>Conifer Trees</b> (Growing in Christmas Tree Nurseries and Plantations)	European Pine Shoot Moth ( <i>Rhyacionia buoliana</i> ), Gypsy Moth, Nantucket Pine Tip Moth, Pitch Eating Weevil, Pales Weevil, Adult Root Collar Weevil, Sawfly	1-4 quarts per acre OR Dilute application for individual trees 1-3 quarts per 100 gals.	Apply in sufficient water to achieve thorough and complete coverage. Apply when pest populations reach economic threshold levels as determined by the local Extension Service, Forest Service, or other monitoring system.
	Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 13 days. Do not make more than 3 applications per year.		
<b>Conifer Tree Seed Orchards</b>	Seedworms, Coneworms, Seed Bugs, Mealybugs	1-4 quarts per acre	Thorough coverage of cones is necessary for maximum control. Apply in sufficient water for complete coverage. First application should be applied within 30 days of peak pollen flight followed by 2 applications as needed
	Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 13 days. Do not make more than 3 applications per year.		
<b>Deciduous Shade Trees, and Woody Evergreens</b> (Ash, Beech, Birch, Elm, Hickory, Maple, Oak, Willow, Locust, Arborvitae, Azalea, Boxwood, Cotoneaster, Fir, Hemlock, Holly, Juniper, Mountain Laurel, Pine, Pyracantha, Rhododendron, Spruce, Yew)	Elms Spanworm, Birch Leafminer, Eastern Tent Caterpillar, Elm Leaf Beetle larvae, Gypsy Moth, Leafhopper, Magnolia Leafminer, Mealybug, Japanese Beetle, Redhumped Caterpillar, Snails, Slugs, Spring Cankerworm	Dilute application for individual trees 1-3 quarts per 100 gals.	Apply when insects or their damage occur. Thoroughly wet all parts of the affected plants to the point of runoff. For heavy infestations, use the higher dosage rate. Repeat application as necessary to maintain insect control. Choose a cool calm period, preferably in early morning or evening.
	Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 13 days. Do not make more than 3 applications per year. Do not apply if rain is expected or before leaf surfaces are dry.		
<b>Nursery Plants Including Flowering Trees and shrubs</b> (Crape Myrtle, Jasmine, Dogwood, Lilac, Euonymus, Magnolia, Forsythia, Privet, Hawthorne)	Elms Spanworm, Birch Leafminer, Eastern Tent Caterpillar, Elm Leaf Beetle larvae, Gypsy Moth, Leafhopper, Magnolia Leafminer, Mealybug, Japanese Beetle, Redhumped Caterpillar, Snails, Slugs, Spring Cankerworm	Dilute application for individual plants 1-3 quarts per 100 gals.	Apply in sufficient water to achieve thorough and complete coverage. Apply when pest populations reach economic threshold levels as determined by the local Extension Service, Forest Service, or other monitoring system.
	Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 24 hours. Do not make more than 3 applications per year. Do not apply if rain is expected or before leaf surfaces are dry.		
<b>Roses</b>	Fruit Tree Leafroller, Mimosa Webworm, Two-spotted Mite	Dilute application 1-3 quarts per 100 gals.	Apply when insects or their damage occur. Thoroughly wet all parts of the affected plants to the point of runoff. For heavy infestations, use the higher dosage rate. Repeat application as necessary to maintain insect control. Choose a cool calm period, preferably in early morning or evening.
	Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 24 hours. Do not make more than 3 applications per year.		

12. Revise the following sections of the **STORAGE AND DISPOSAL** statement:

Revise the **STORAGE** statement as follows:

**“PESTICIDE STORAGE:** Store in a cool, dry place. Do not store in areas where temperatures fall below 20° F. Always store pesticides in the original container. If a leaky container must be contained within another, mark the outer container to identify the contents. The storage area must be dry, well-lit, and well-ventilated. Keep pesticide

storage areas clean. Clean up spills promptly. Store Pesticides away from food, feed, seed, and fertilizers.”

Also, revise the **PESTICIDE DISPOSAL** statement as follows:

“**PESTICIDE DISPOSAL:** To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry).”

Also, revise the **CONTAINER DISPOSAL** statement as follows:

“**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.”

13. Revise the **WARRANTY STATEMENT** as follows:

In the third paragraph, revise the last sentence as follows: “TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, GOWAN COMPANY MAKES NO OTHER EXPRESS OR IMPLIED . . . . .”

In the last paragraph, revise “TO THE FULLEST EXTENT PERMITTED BY LAW,” to “TO THE EXTENT CONSISTENT WITH APPLICABLE LAW,”

Two copies of the finished labeling must be submitted prior to releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. If you have any questions, you may contact Clayton T. Myers, at (703) 347-8874.

Sincerely,



Richard Gebken  
Product Manager 10  
Insecticide Branch  
Registration Division (7505P)

Enclosure

# IMIDAN<sup>®</sup> 1-E Insecticide

An Emulsifiable Concentrate Recommended for Agricultural-Industrial Use Only

For the control of insects specified in the directions on deciduous shade trees, evergreens, ornamental flowering trees and shrubs and roses.

<b>ACTIVE INGREDIENT:</b> Phosmet	% By Wt.
N-(Mercaptomethyl) phthalimide S-(O,O-dimethyl phosphorodithioate) .....	11.7%
<b>INERT INGREDIENTS*</b> .....	88.3%
	<b>TOTAL 100.0%</b>

Contains 1 pound phosmet per gallon

## KEEP OUT OF REACH OF CHILDREN 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 Organophosphate	
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-888-478-0798 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
This product is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine.	

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
JAN 27 2010  
Under the Federal Insecticide  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No  
10163-171**

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING-AVISO

May be fatal if swallowed, inhaled, or absorbed through the skin. Do not breathe dust or spray mist. Do not get in eyes, on skin, or on clothing.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are barrier laminate and viton. If you want more options, follow the instructions for category H on an EPA chemical-resistance category selection chart.

**Mixers, loaders, and applicators using engineering controls, including closed systems, enclosed-cockpit aerial equipment and enclosed-cab ground equipment, and mixers, loaders, and applicators using handheld equipment or handheld nozzles must wear at least (see engineering control section of this labeling for more requirements and options):**

- Long-sleeved shirt and long pants,
- Shoes plus socks,
- Chemical resistant gloves when mixing and loading and when applying with handheld equipment or handheld nozzles, and
- Chemical resistant apron when mixing and loading.

**Motorized ground equipment applicators not in an enclosed cab, applicators dipping pine seedlings, and handlers engaged in cleaning up a spill or leak, or cleaning or repairing contaminated equipment, must wear:**

- Coveralls over long-sleeve shirt and long pants,
- Chemical-resistant gloves,
- Chemical-resistant footwear plus socks,
- Chemical-resistant headgear for overhead exposure,
- Chemical-resistant apron, if exposed to the concentrate or applying as a pine seedling dip, and
- A respirator with an organic-vapor cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH-approved respirator with an organic vapor (OV) cartridge or canister with any N, R or P or He prefilter.

See Engineering Controls for additional requirements and options.

NET CONTENTS \_\_\_\_\_ GALLONS

EPA Reg. No. 10163-171  
EPA Est. No. 67545-AZ-1

**Gowan**  
The Go To Company

Produced For:  
Gowan Company  
PO Box 5569  
Yuma, Arizona 85366-5569

7/10

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. See engineering controls for additional requirements. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. See Engineering Controls for additional requirements.

**ENGINEERING CONTROLS**

**Engineering Controls for Mixers and Loaders:**

Mixers and loaders must use a closed system that meets the requirements listed in the Workers Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)]. The system must be capable of removing the pesticide from the shipping container and transferring it into mixing tanks and/or application equipment. At any disconnect point, the system must be equipped with a dry disconnect or dry couple shut-off device that is warranted by the manufacturer to minimize drippage to no more than 2 ml per disconnect. In addition, mixers and loaders must:

- Wear the Personal Protective Equipment specified in the PPE section of this labeling for mixers and loaders using engineering controls;
- Wear protective eyewear if the system operates under pressure; and
- Be provided and have immediately available for use in an emergency, such as a broken package, spill, or equipment breakdown: chemical-resistant footwear, and a respirator of the type specified in the PPE section of this labeling.

**Engineering Controls for Applicators using Enclosed Cab Motorized Ground Equipment:**

When applicators use motorized groundboom or airblast equipment with an enclosed cab that meets the definition in the Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d)(5)] for dermal protection, they must:

- Wear the PPE specified on this labeling for applicators using enclosed cabs, and
- Either wear a respirator of the type specified in the PPE section of this labeling OR use an enclosed cab that is declared in writing by the manufacturer or by a government agency to provide at least as much respiratory protection as the respirator specified above,
- Be provided and must have immediately available for use in an emergency when they must exit the cab in the treated area:
  1. Coveralls,
  2. Chemical-resistant gloves,
  3. Chemical-resistant footwear,
  4. Chemical-resistant headgear if overhead exposure; and
  5. If using an enclosed cab that provides respiratory protection, a respirator of the type specified in the PPE section of this labeling.
- Take off any PPE that was worn in the treated area before reentering the cab, and
- Store all such PPE in a chemical-resistant container, such as a plastic bag, to prevent contamination of the inside of the cab.

**Engineering Controls for Aerial Applications:**

Pilots must use an enclosed cockpit in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40CFR 170.240(d)(6)]. Human flagging is prohibited.

**ENVIRONMENTAL HAZARDS**

This chemical can contaminate surface water through aerial and ground spray applications. Under some conditions, it may also have a high potential for runoff into surface water after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas overlaying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

This pesticide is toxic to fish and 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. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed directly to application residues on crops. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area. Protective information may be obtained from your Cooperative Agricultural Extension Service.

**USE PRECAUTIONS**

Read all precautions and directions before using. Apply this product only as specified on this label. Insecticidal activity may also be reduced when the spray solution has a pH of 6 or higher. **The pH of the spray solution must be corrected by the addition of a suitable buffering or acidifying agent for optimum insecticidal activity.**

**USER SAFETY RECOMMENDATIONS**

**Users should:**

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE 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.

**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. Not for use in residential areas.

**SPRAY DRIFT MANAGEMENT**

**Avoiding spray drift is the responsibility of the applicator. The interaction of many equipment and weather-related factors determine the potential for spray drift. The applicator is responsible for considering all these factors when making applications.**

**For overhead chemigation:**

Apply only when wind speed is 10 mph or less.

**For ground boom applications:**

Apply with nozzle height no more than 2 feet above the ground or crop canopy, and when the wind speed is 10 mph or less at the application site as measured by an anemometer. Use a coarse or coarser spray (ASABE definition S572) for standard nozzles, or a volume mean diameter (VMD) of 385 microns or greater for spinning atomizer nozzles.



**For airblast applications:**

Do not direct spray above trees and vines, and turn off outward pointing nozzles at row ends and when spraying the outer 2 rows. Apply only when the wind speed is 10 mph or less at the application site as measured by an anemometer.

**For aerial applications:**

If the application includes a no-spray buffer zone, do not release spray at a height greater than 10 feet above the ground or crop canopy. Apply only when the wind speed is 10 mph or less. Use a coarse or coarser spray (ASABE definition S572) for standard nozzles, or a volume mean diameter (VMD) of 385 microns or greater for spinning atomizer nozzles. Aerial applicators must consider flight speed and nozzle orientation in determining droplet size. The boom width must not exceed 75% of the wingspan or 90% of the rotary blade. When applications are made with a cross-wind, the swath will be displaced downwind. The applicator must compensate for this displacement at the downwind edge of the application by adjusting the path of the aircraft upwind.

The applicator also must use all other measures to control drift.

**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). The REI for each crop is listed in the directions for use associated with each crop.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated area.

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
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material
- Chemical-resistant headgear for overhead exposures

**DILUTION DIRECTIONS**

The rate required for thorough, uniform coverage varies with plant growth at time of application. **Except as specified for certain uses**, the following rates are intended to cover a broad range of conditions. Mix well before using. Imidan 1-E is an emulsifiable liquid for use in water for spray applications. Combinations with other insecticides and fungicides have not been fully tested at this time. It is not compatible with alkaline materials such as lime or Bordeaux mixtures. Keep children and pets away from immediate area while spraying. Do not apply during periods of abnormally high humidity. Do not overdose.

**RECOMMENDATIONS**

CROP	PEST	USE RATE
<b>SHADE TREES</b> (Ash, Beech, Birch, Elm, Hickory, Maple, Oak, Willow, Locust)	Green Apple Aphid, Maple Aphid, Rose Aphid, Woolly Apple Aphid, Woolly Beech Aphid	1 to 2 quarts/100 gallons
<b>FLOWERING TREES AND SHRUBS</b> (Crape Myrtle, Jasmine, Dogwood, Lilac, Euonymus, Magnolia, Forsythia, Privet, Hawthorne)	Elm Leaf Beetle, Elm Spanworm, Fall Cankerworm, Fall Webworm, Forest Tent Caterpillar, Gypsy Moth, Japanese Beetle, Leaf Teirs, Spring Cankerworm, Willow Leaf Beetle • Use 2 quarts for early instars.	2 to 3 quarts/100 gallons
<b>EVERGREENS</b> Arborvitae, Azalea, Boxwood, Cotoneaster, Fir, Hemlock, Holly, Juniper, Mountain Laurel, Pine, Pyracantha, Rhododendron, Spruce, Yew	Birch Leafminer, European Red Mite, Mealy Bug, Pine Bark Aphid	2 quarts/ 100 gallons
<b>ROSES</b>	Fruit Tree Leafroller, Mimosa Webworm, Two-spotted Mite	3 quarts/100 gallons
<ul style="list-style-type: none"> <li>• For nursery plants, do not enter or allow entry into treated areas during the restricted entry interval (REI) of 24 hours</li> <li>• For evergreen trees, do not enter or allow entry into treated areas during the restricted entry interval (REI) of 13 days.</li> <li>• Do not make more than 3 applications per year.</li> </ul>		

10/2

#### STORAGE AND DISPOSAL

**DO NOT** contaminate water, food or feed by storage or disposal.

**STORAGE:** Store in a cool, dry place. Avoid freezing.

**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:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

**SPILL OR LEAK:** A small spill can be handled routinely. Use adequate ventilation and wear an air supplied respirator to prevent inhalation. Wear suitable protective clothing and eye protection to prevent skin and eye contact. Use the following procedures:

1. Spread a suitable absorbent such as clay, sawdust, or kitty litter on the spilled material.
2. Place sweepings into an open drum.
3. Generously cover the contaminated areas with a common household detergent. Using a stiff brush and small amounts of water, work the detergent into the spill material forming a slurry. Do not splatter on one's self or bystanders, and completely avoid skin and eye contact with this material. Brush the slurry into cracks and crevices and allow to stand for 2 to 3 minutes.
4. Spread absorbent such as clay, sawdust, or kitty litter on the slurred liquid. Shovel absorbed material into an open drum.
5. Repeat if necessary.
6. Flush area with water while observing proper environmental considerations.
7. Seal drum and dispose of contaminated material in an approved pesticide landfill.

Large spills must be handled according to a predetermined plan. For assistance in developing a plan, contact Gowan Company.

**FOR 24-HOUR EMERGENCY ASSISTANCE (SPILL, LEAK, OR FIRE), CALL CHEMTREC® (800) 424-9300.**

**For other product information, contact Gowan Company or see Material Safety Data Sheet.**

#### NOTICE OF CONDITIONS OF SALE AND WARRANTY AND LIABILITY LIMITATIONS

Important: Read the entire Directions for Use and Notice of Conditions of Sale and Warranty and Liability Limitations before using this product. If terms are not acceptable return the unopened container for a full refund.

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