

42750-153

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

April 2, 2007

Mr. Morris Gaskins
Registration Manager
Albaugh, Inc.
P.O. Box 2127
Valdosta, GA 31604-2127

RE: Alternate Warranty Statement
Registration Number: 42750-153
Date of Submission: January 30, 2007

Dear Mr. Gaskins:

After receiving your telephone call on March 30, 2007, regarding our letter dated March 20, 2007, indicating the warranty statement was unacceptable, we have reevaluated your label and determined that the submission is acceptable as a notification. Therefore, the label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions concerning this action, please feel free to contact me on 703/308-5479.

Sincerely,

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

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

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Morris Gaskins
Registration Manager
Albaugh, Inc.
P.O. Box 2127
Valdosta, GA 31604-2127

MAR 20 2007

RE: Alternate Warranty Statement
EPA Registration Number: 42750-153
Date of Submission: January 30, 2007

Dear Mr. Gaskins:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 30, 2007, for the product Imidacloprid 60 WP GH. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested does not clearly fall within the scope of PRN 98-10 and will require additional administrative review of the related files. A summary of our findings include:

Unacceptable warranty disclaimer language. The warranty guidance document can be accessed at on the Web site in the "Labeling Resources" box. You may access the pdf file directly at <http://www.epa.gov/pesticides/regulating/labels/warranty.pdf>.

Please be advised that PRNs are provided as guidance; they are not considered regulation by the Agency. Therefore, the RD reserves the right to make the above determination and concludes that this action must be submitted by you as an amendment. No further processing of this action will occur until a resubmission is made. The RD has determined that this action is denied and our records have been updated accordingly.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

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



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42750-153	2. EPA Product Manager <i>D. Kenny V. Eagle</i>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Imidacloprid 60 WP GH	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of alternate warranty statement

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no further changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 30 lb		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Morris Gaskins</i>	3. Title Registrations Manager	
4. Typed Name Morris Gaskins	5. Date January 30, 2007	

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IMIDACLOPRID 60WP GH

Greenhouse and Nursery Insecticide in Water Soluble Packaging

For Foliar and systemic Insect Control on Ornamental and Vegetable Plants in Greenhouses, Nurseries and Interior Plantscapes

ACTIVE INGREDIENT:	
Imidacloprid, 1-[(6-Chloro-3-pyridinyl) methyl]-N-nitro-2-imidazolidinimine	60.0%
OTHER INGREDIENTS:	40.0%
TOTAL:	100.0%

Keep water soluble packets in this container and store in a cool dry place but not below freezing (32F).

Do Not Remove Packets From Container Except For Immediate Use.

STOP - READ THE LABEL BEFORE USE

KEEP OUT OF REACH OF CHILDREN

CAUTION

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 give anything by mouth to an unconscious person.
IF INHALED	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
IF IN EYES	Hold eye open and rinse slowly and gently with water for 15 to 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.
In case of emergency call toll free at 1-800-492-8255. Have a product container or label with you when calling a poison control center or doctor, or going for treatment.	
Note To Physician: No specific antidote is available. Treat the patient symptomatically.	

EPA Reg. No. 42750-153

EPA Est. No. xxxxxx-xx-xxx

NET CONTENTS: 100 grams or Five - 20 gram packets

MANUFACTURED FOR:
Albaugh, Inc.
Ankeny, IA 50021

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

1. Long-sleeved shirt and long pants
2. 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
3. Shoes plus socks

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

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

User should:

1. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
2. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
3. 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.

ENVIROMENTAL 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 visiting the treatment area.

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.

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.

AGRICULTURAL USE REQUIREMENTS

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

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

Exception: If the product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

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

Do not formulate this product into other end-use products.

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: After removal of all PVA packets, dispose of empty container in a sanitary landfill, by incineration or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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, invert to prevent leakage. If container is leaking or material spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides above. In spill or leak incidents, keep unauthorized people away.

GENERAL INFORMATION

IMIDACLOPRID 60WP GH is for insect control on ornamental and vegetable plants in nurseries, greenhouses and interior plantscapes. IMIDACLOPRID 60WP GH is a systemic product and will be translocated upward within the plant. This product is to be applied as a soil treatment only. To assure optimum effectiveness, the product must be placed where the roots of the plant can absorb the active ingredient.

Irrigate moderately but thoroughly after application, allowing no leaching and runoff from container for at least three irrigations or 10 days whichever ever is longer.

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.

For resistance management purposes, a foliar application of any chloronicotinyl insecticide following an IMIDACLOPRID 60WP GH soil application in the same crop is not recommended.

Incorporation: Incorporation of IMIDACLOPRID 60WP GH can be achieved by cultivation, irrigation, rainfall, mechanical placement, soil injection, drenching, and broadcast sprays.

Woody Perennials: Onset of protection is slower than in herbaceous species. A delay of 2 or more weeks should be expected. Longer delays may be expected with larger plants. Application should therefore be made well in advance of expected insect activity.

Bark Media: Media with 30 to 50% or more bark content may confer a shorter period of protection when treated with IMIDACLOPRID 60WP GH.

Tank Mixes: IMIDACLOPRID 60WP GH has been found to be compatible with commonly used liquid fertilizers, fungicides and insecticides. Check physical compatibility using the correct proportion of products in a small jar test if local experience is unavailable.

PLEASE NOTE: Do not use IMIDACLOPRID 60WP GH packets in a tank mix with products that contain boron or release free chlorine. The resultant reaction of PVA and boron or free chlorine is a plastic which is not soluble in water. However, normal chlorinated water is acceptable for mixing.

MIXING: Within each foil pouch is a clear inner packet containing IMIDACLOPRID 60WP GH. The clear inner packet is water soluble. Do not allow packets to become wet prior to adding to the tank. Do not handle the clear inner packets with wet hands or wet gloves. Rough handling may cause breakage.

Reseal outer carton to protect remaining packets. To prepare the mixture, remove the outer foil pouch and drop the required number of unopened clear water soluble packets, as determined under "Recommended Drench and Irrigation Applications", into the spray tank while filling with water to the desired level. Operate the agitator while mixing.

Depending on the water temperature and the degree of agitation, the packets should be completely dissolved within a few minutes from the time they are added to the water. Cooler water temperatures increase the time needed for the inner packet to dissolve completely.

APPLICATION TO GRASSY AREAS IN NURSERIES

IMIDACLOPRID 60WP GH can be used for the control of the following soil inhabiting pests of grassy areas of nurseries:

Northern and Southern masked chafers, *Cyclocephala borealis*, *C. immaculata*, and/or *C. lurida*;
 Asiatic garden beetle, *Maladera castanea*;
 European chafer, *Rhizotrogus majalis*;
 Green June beetle, *Cotinis nitida*;
 May or June beetle, *Phyllophaga spp.*;
 Japanese beetle, *Popillia japonica*;
 Oriental beetle, *Anomala orientalis*;
 Billbugs, *Spherophorus spp.*;
 Annual bluegrass weevil, *Hyperodes spp.*;
 Black turfgrass ataeenius, *Ataenius spretulus* and *Aphodius spp.*
 Mole crickets, *Scapteriscus spp.*

IMIDACLOPRID 60WP GH can be used as directed on nursery grass in sites such as under or around field or container grown plants, on road-ways or other grassy areas in or around nurseries.

IMIDACLOPRID 60WP GH cannot be used on commercial sod farms.

The active ingredient in IMIDACLOPRID 60WP GH has sufficient residual activity so that applications can be made preceding the egg laying activity of the target pests. High levels of control can be achieved when applications are made preceding or during the egg laying period. 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. Optimum control will be achieved when applications are made prior to egg hatch of the target pests, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

Applications should not be made when grassy areas are waterlogged or the soil is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist. The treated grassy area must be in such a condition that the rainfall or irrigation will penetrate vertically in the soil profile. Application cannot exceed a total of 10.7 oz (0.4 lb of active ingredient) per acre per year.

Application Equipment for Use on Grassy Areas in Nurseries: Apply IMIDACLOPRID 60WP GH in sufficient water to provide adequate distribution in the treated area. The 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.

APPLICATION THROUGH IRRIGATION SYSTEMS

IMIDACLOPRID 60WP GH may be applied at rates recommended on this label either alone or in tank mixture with other pesticides and chemicals registered for application through irrigation systems. The normal dilution ratio is 1:10 to 1:200, depending on the system. Always meter the product into the irrigation water during the first part of the irrigation cycle. The product may be mixed separately prior to injection. Agitation may be necessary if the mixture is allowed to stand more than 24 hours.

Remove scale, pesticide residue and other foreign matter from the tank and entire irrigation system.

Apply IMIDACLOPRID 60WP GH only through micro-irrigation (individual spaghetti tube), drip irrigation, overhead irrigation, ebb and flood, or hand-held or motorized calibrated irrigation equipment.

Do not apply this product through any other type of irrigation system. Crop injury or lack of effectiveness can result from non-uniform distribution of treated water.

If you have any questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.

Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

A person knowledgeable of the chemigation system and responsible for its operation, or a person who is under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

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SAFETY DEVICES FOR IRRIGATION SYSTEMS CONNECTED TO PUBLIC WATER SUPPLIES:

If the source of water for your irrigation system is a public water supply, follow the instructions below.

1. Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.
2. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.
3. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
4. The pesticide injection pipeline must contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
5. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Do not apply when wind speed favors drift beyond the area intended for treatment.

SAFETY DEVICES FOR IRRIGATION SYSTEMS NOT CONNECTED TO A PUBLIC WATER SUPPLY:

1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional normally closed solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where the pesticide distribution is adversely affected.
6. Systems must use a metering pump such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and

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capable of being fitted with a system interlock.

7. Do not apply when wind speed favors drift beyond the area intended for treatment.

RECOMMENDED APPLICATIONS

GRASSY AREAS OF FIELD & FOREST NURSERIES

PEST		DOSAGE
Larvae of: Annual bluegrass weevil Asiatic garden beetle Billbugs Black turfgrass ataeenius Cutworms (suppression) European Chafer	Green June beetle Japanese beetle Northern masked chafer Oriental beetle Phyllophaga spp. Southern masked chafer	One packet per 2900-3850 sq ft.
Chinch bugs (suppression)	Mole Crickets	One packet per 2900 sq ft.
<p>For optimum control of grubs, billbugs and annual bluegrass-weevil, make application prior to egg hatch of the target pest.</p> <p>Be sure to read "APPLICATION EQUIPMENT" Section of this label.</p> <p>For suppression of chinch bugs, make application prior to the hatching of the first instar nymphs. For control of mole crickets make application prior to or during the peak egg hatch period. When adults or large nymphs are present and actively tunneling. IMIDACLOPRID 60WP GH application should be accompanied by a curative insecticide. Follow label instructions for other insecticides when tank-mixing.</p> <p>Consult your local turf, state Agricultural Experiment Station, or State Extension Service Specialist for more specific information regarding timing of application. NOTE: <i>For optimum control, irrigation or rainfall should occur within 24 hours after application to move the active ingredient through the thatch.</i> Do not apply more than 10.7 oz (0.4 lb of active ingredient) per acre per year. Avoid mowing grass area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.</p>		

RECOMMENDED APPLICATIONS
FOR USE ON OR IN ORNAMENTALS

For foliar and systemic insect control in and around field-grown nursery and containers stock, indoor and outdoor ornamentals (including both greenhouse and interior plantscapes) and ornamentals grown in flats, benches or beds.

CROP	PEST	DOSAGE
Trees (including non-bearing fruit and nut) Shrubs Evergreens Flowers Foliage plants Ground covers Interior Plantscapes Vegetable plants*	Adelgids Aphids Japanese beetles (adults) Lacebugs Leaf beetles (including Elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter)	Leafminers Mealybugs Sawfly larvae Thrips (suppression) Whiteflies One packet per 100 gal water
Foliar Applications: Start treatments prior to establishment of high pest populations and reapply on an as needed basis.		
For resistance management purposes, a IMIDACLOPRID 60WP GH foliar application following a soil application in the same crop is not recommended.		
White grub larvae (such as Japanese beetle larvae, chafers, Phyllophaga spp., Asiatic garden beetle, Oriental beetle)		One packet per 2900-3850 sq ft.
Broadcast Applications: Mix required amount of product in sufficient water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of water per 1000 sq. ft. For optimum control, irrigate thoroughly to incorporate IMIDACLOPRID 60WP GH Insecticide into the upper soil profile.		
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.		
* Only for use on vegetable plants intended for resale including: Broccoli, Chinese broccoli, Broccoli raab, Brussels sprouts, Cabbage, Chinese Cabbage, Cauliflower, Collards, Eggplant, Ground cherry, Kale, Kohlrabi, Lettuce, Mustard greens, Pepinos, Peppers, Potatoes, Rape greens, Sorghum, Sugarbeets, Tomatillo, and Tomato.		

RECOMMENDED DRENCH AND IRRIGATION APPLICATIONS

For use only on ornamental and vegetable plants in greenhouses, nurseries and interior plantscapes using soil drenches, micro-irrigation, drip irrigation, overhead irrigation, ebb and flood irrigation, or hand-held or motorized calibrated irrigation equipment.

Pest	Use Pattern		Dosage - IMIDACLOPRID 60WP GH		Remarks
	Plants in Containers	Herbaceous Species - including Vegetable plants 5	Container Size (inches)	No. pots treated with one (1) Packet	
Adelgids	Plants in Containers	Herbaceous Species - including Vegetable plants 5 (one or two plants per pot)	2	3000	Evenly distribute one (1) packet of IMIDACLOPRID 60WP GH Insecticide in the stated number of pots, using sufficient water volume to wet potting medium without loss of liquid through leaching. Apply according to label directions. Follow application with moderate irrigation. Irrigate carefully during the next 10 days in order to avoid loss of active ingredient due to leaching.
Aphids			3	2000	
Armored scale (suppression)			4	1500	
Fungus gnats (larvae only) 1			5	1200	
Japanese Beetle (adults)			6	1000	
Lacebugs			7	850	
Leaf beetles (including elm and viburnum leaf beetles)			8	750	
Leafhoppers (including glassy-winged sharpshooter)			9	675	
Leafminers			10	600	
Mealybugs			11	550	
Psyllids			12	500	
Root mealybugs 2			Woody Perennial Species	Use the above Woody Perennial Species rates	
Root Weevil Complex (Such as Black Vine Weevil, Apopka Weevil, Citrus Root Weevil 3)	3	1350			
Soft Scale	4	1000			
Thrips (suppression) 4	5	800			
White Grub larvae (such as Japanese Beetle, Masked Chafers, European Chafer, Oriental Beetle, Asiatic Garden Beetle)	6	650			
Whiteflies	7	550			
	8	500			
	9	450			
	10	400			
	11	350			
	12	300			
	Ornamental and vegetable plants grown in flats, benches, or beds	One packet per 3000 sq ft			
	Containerized Plants	Container Size	No. Pots Treated with One (1) Packet		Apply in sufficient water to wet the potting medium. For optimum control, make applications prior to egg hatch of the target pest. Irrigate moderately after application to move the active ingredient into the root zone.
		1 gallon	240 to 120		
		2 gallon	120 to 60		
		3 gallon	90 to 40		
		5 gallon	65 to 30		

Pest	Use Pattern	Dosage - IMIDACLOPRID 60WP GH	Remarks
White Grub larvae (such as Japanese Beetle, Masked Chafers, European Chafer, Oriental Beetle, Asiatic Garden Beetle)	Field and Forest Nurseries	<p>Apply as a uniform band on either side of row using a band six (6) inches wider than the actual root ball diameter to be dug. Do not allow bands in adjacent rows to overlap. Use one (1) packet per 1000 ft. of row or 3000 sq. ft.</p> <p>For grub control in areas of turf, apply as a broadcast application using one (1) packet per 3000 sq. ft.</p>	<p>Vegetation in the area to be treated should be mowed to a height of 3 inches or less prior to application. Mowing to the lowest possible height will insure greater consistency of control.</p> <p>Apply May through July. For optimum control, treatment should be followed by rainfall or irrigation. Do not use less than 2 gallons of spray volume per 1000 square feet.</p>

1. Fungus gnat larvae in the soil will be controlled by drench or incorporation. No adult Fungus Gnat control. Other foliar insect control is achieved by the uptake of IMIDACLOPRID 60WP GH Insecticide from a healthy root system translocating the active ingredient up into the plant.
2. Root Mealybug control will require a thorough drenching of containerized media. Coverage is essential for control while minimizing the amount of leachate. Rate: one (1) packet in 150 gallons of water.
3. Citrus Root Weevil: For use on non-bearing citrus nursery stock.
4. Thrips suppression on foliage only. Thrips in buds and flowers will not be suppressed.
5. Note: For use on vegetable plants intended for resale only including: Broccoli, Chinese Broccoli, Broccoli Raab, Brussels Sprouts, Cabbage, Chinese Cabbage, Cauliflower, Collards, Eggplant, Ground Cherry, Kale, Kohlrabi, Lettuce, Mustard Greens, Pepinos, Peppers, Potatoes, Rape Greens, Sorghum, Sugarbeets, Tomatillo, and Tomato.

RESTRICTIONS

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soils which are water-logged or saturated, which will not allow the penetration of the insecticide into the root zone of the plants
- Do not allow leachate runoff for the first 10 days after application, in order to retain the product and facilitate full plant uptake of the active ingredient.
- For outdoor ornamentals grown in beds or turf, applications of IMIDACLOPRID 60WP GH Insecticide cannot exceed a total of 10.7 oz (0.4 lb of active ingredient) per acre per year.
- On plants with a production cycle of less than one year, application is not to exceed a frequency of more than once each 16 weeks for a particular plant. On stock plants and woody crops with a production cycle of greater than one year, application may not exceed once a year.
- Food Crops: Treated areas may be replanted with any crop specified on an imidacloprid label, or with 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 should be observed.

RECOMMENDED SOIL INJECTION AND DRENCH APPLICATIONS FOR NURSERY, GREENHOUSE AND INTERIORESCAPE PLANTS

- | | |
|---|----------------------|
| Adelgids | Leafminers |
| Aphids | Mealybugs |
| Armored scales (suppression) | Pine Tip moth larvae |
| Black vine weevil larvae | Psyllids |
| Eucalyptus longhorned borers | Royal palm bugs |
| Flatheaded borers (including bronze birch and alder borers) | Sawfly larvae |
| Japanese beetles (adults) | Soft scales |
| Lacebugs | Thrips (suppression) |
| Leaf beetles (including elm and viburnum leaf beetles) | White grub larvae |
| Leafhoppers (including glassy-winged sharpshooter) | Whiteflies |

TREES: 1 packet (20 grams) per 8 to 16 inches of cumulative trunk diameter.

Soil Injection:

- GRID SYSTEM: Holes should be spaced on 2.5 foot centers, in a grid pattern, extending to the drip line of the tree.
- CIRCLE SYSTEM: Apply in holes evenly spaced in circles, (use more than one circle dependent upon the size of the tree) beneath the drip line of the tree extending in from that line.
- BASAL SYSTEM: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base.

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.

No Soil Injection Application Allowed in Nassau or Suffolk Counties of New York.

Soil Drench:

Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.

For Control of Specified Borers:

Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing pest damage and tree stress.

SHRUBS: 1 packet (20 grams) per 8 to 16 feet of cumulative shrub height

Soil Injection:

Apply to individual plants using dosage indicated.

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. Keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per shrub.

No Soil Injection Application Allowed in Nassau or Suffolk Counties of New York.

Soil Drench:

Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.

FLOWERS AND GROUND COVERS: 1 packet (20 grams) per 3000 sp. 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

EBB & FLOOD APPLICATION

IMIDACLOPRID 60WP GH may be applied through Ebb and Flood applications. To assure accurate uptake it is recommended that prior to treatment, a minimum of 10 plants be brought up to a known field capacity and allowed to dry out for one or two days. Re-wet these plant to determine how much water on average each plant will absorb to bring it back at field capacity. Use the volume absorbed per plant (keeping pot sizes uniform) multiplied by the number of pots being treated. Add to this volume a required minimum to flood your smallest treatment area. This should minimize the return back to the storage tank. Re-use the returned volume with subsequent irrigation or nutrients on the same plants.

- Adelgids
- Aphids
- Armored scales (suppression)
- Fungus Gnats (larvae only) ¹
- Japanese Beetles (adults)
- Lacebugs
- Leaf beetles (including elm and viburnum leaf beetles)
- Leafhoppers (including glassy-winged sharpshooter)
- Leafminers
- Mealybugs
- Psyllids
- Root mealybugs ²
- Root Weevil Complex: (such as Apopka Weevil, Black Vine Weevil, Citrus Root Weevil ³)
- Soft Scales
- Thrips (suppression)⁴
- Whiteflies
- White Grub larvae (such as Japanese Beetle, Masked Chafer, European Chafer, Oriental Beetle, Asiatic Garden Beetle)

Pot sizes (inches)	Number of pots treated with one packet	
	Herbaceous species including vegetable plants ⁵ (one or two plants per pot)	Woody perennials, Herbaceous species including vegetable plants ⁵ (3 or more per pot)
2	3000	2000
3	2000	1350
4	1500	1000
5	1200	800
6	1000	650
7	850	550
8	750	500
9	675	450
10	600	400
11	550	350
12	500	300

1. Fungus gnat larvae in the soil will be controlled by drench or incorporation. No adult Fungus Gnat control. Other foliar insect control is achieved by the uptake of IMIDACLOPRID 60WP GH from a healthy root system translocating the active ingredient up into the plant.
2. Root Mealybug control will require a thorough drenching of containerized media. Coverage is essential for control while minimizing the amount of leachate. Rate: 1.7 fl oz (50 mL) in 150 gallons of water.
3. Citrus Root Weevil: For use on non-bearing citrus nursery stock.
4. Thrips suppression on foliage only. Thrips in buds and flowers will not be suppressed.
5. Note: For use on vegetable plants intended for resale only including: Broccoli, Chinese Broccoli, Broccoli Raab, Brussels Sprouts, Cabbage, Chinese Cabbage, Cauliflower, Collards, Eggplant, Ground Cherry, Kale, Kohlrabi, Lettuce, Mustard Greens, Pepinos, Peppers, Potatoes, Rape Greens, Sorghum, Sugarbeets, Tomatillo, and Tomato.

IMPORTANT: READ BEFORE USE

By using this product, user or buyer accepts the conditions, disclaimer of warranties and limitations of liability. Read the entire directions for use, conditions of warranties and limitations of liability before using this product. If terms are not acceptable, return the unopened product container at once for full refund.

CONDITIONS: This product has been researched to provide necessary data to support its uses listed on the label. The directions for use of this product are believed to be adequate and the user or buyer must always follow the label directions carefully and exercise judgment and caution when using this product under their growing conditions. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness, unsatisfactory or substandard results or other unintended consequences may result because of such factors as weather conditions, presence or absence of other materials, or the manner of use or application, all of which are beyond the control of Albaugh, Inc. All such risks shall be assumed by the user or buyer.

WARRANTY: This product corresponds to all claims and descriptions set forth on the label and, subject to the conditions set forth above, is reasonably fit for use for any purpose for which it is intended. Albaugh,

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FEDERAL EXPRESS

January 30, 2007

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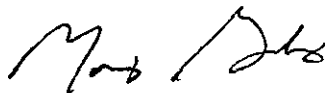
RE: Imidacloprid 60WP GH
EPA Reg. No. 42750-153

Dear Sirs,

The enclosed submission is a label notification under PR Notice 98-10 and 40 CFR 152.46 for an alternate warranty statement and emergency contact number. No other changes have been made to the label text.

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.
229-244-3288

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