

53883-201

10/04/2006

1/24



U.S. ENVIRONMENTAL PROTECTION AGENCY

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

EPA Reg.  
Number:  
53883-201

Date of Issuance:  
OCT 4 2006

Term of Issuance: **Conditional**

Name of Pesticide Product:  
IMI 75 Insecticide in Water  
Soluble Packets

NOTICE OF PESTICIDE:

Registration  
 Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Ms. Jane M. Miller  
Biologic Inc.  
115 Obtuse Hill  
Bookfield, Connecticut 06804

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). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

- 1. Revise the EPA Registration Number to read, EPA Reg. No. "53883-201".

Signature of Approving Official:

Dani Daniel  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Date:

OCT 4 2006

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2. On page two under the heading "Personal Protective Equipment" change waterproof gloves to chemical resistant gloves and complete the statement as follows: Chemical resistant gloves made of any waterproof material such a barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

3. On page 4 second paragraph under the heading "Concrete Slab-on- Ground or Basements" change the word "**should**" to "**must**". Also under the heading "Crawl Space" the first sentence and the sixth sentence change the word "**should**" to "**must**".

4. On page 15 under the heading "Restriction" The sentence "**Do not apply more than 8.6 oz (0.4lb of active ingredient per acre per year)**" at the end of the sentence ending in "root zone of the plant".

5. On page 20 under the heading "Conditions" the first sentence change the word "**should**" to **must**".

6. On page 20 under the "Warranty Statement" rewrite the sentence begin with "**to the extent**" to read as "To the extent consistent with applicable law ...".

7. Submit to the Agency the required one year storage stability (830.6317) study for the proposed product under warehouse conditions. The corrosion characteristics (830.6320) study may be carried out concurrently. It is recommended that observations be made at 0, 3, 6, 9, and 12 months.

8. Submit two copies of your final printed label before you release the product for shipment. If these 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 constitute 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) 305-5409.

Enclosure:

MASTER LABEL – IMI 75

[Labeling for TERMITICIDE uses]

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

3/24

OCT 4 2006

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
53883-201

## IMI 75 Insecticide in Water Soluble Packets

For use by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites, drywood termites, dampwood termites, carpenter ants, and other wood-infesting insects.

**ACTIVE INGREDIENT:**

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 75%

**OTHER INGREDIENTS:**..... 25%

Total: 100%

Do Not Remove Packets From Container Except For Immediate Use.

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

EPA Reg. No. 53883-XXX

EPA Est No. \_\_\_\_\_

Net Contents \_\_\_\_\_

**STOP - Read the label before use.  
Keep out of reach of children.**

### CAUTION

**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.)

**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. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed.

**Personal Protective Equipment**

**Pesticide handlers (mixers, loaders, and applicators) must wear:**

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks

After the product is diluted in accordance with label directions for use, shirt, pants, socks, shoes must be worn. In addition: all pesticide handlers must wear protective eyewear when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injection.

<b>FIRST AID</b>	
<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 a poison control center or doctor.</li> <li>• <i>Do not give anything by mouth to an unconscious person.</i></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 soap and water for 15 to 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 to 20 minutes. 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>
<p>In case of emergency call Poison Control Center at 800-222-1222. Have a product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	
<p><b>Note To Physician:</b> No specific antidote is available. Treat the patient symptomatically.</p>	

**ENVIRONMENTAL HAZARDS**

*This product is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solutions at the specified rate. Do not treat soil that is water-saturated or frozen, or in any conditions where run-off or movement from the treated area (site) is likely to occur.*

**DIRECTIONS FOR USE**

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

**PROFESSIONAL PEST CONTROL**

Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated area, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

MIXING TABLE FOR IMI 75		
GALLONS OF FINISHED SOLUTION DESIRED	NUMBER OF IMI 75 PACKETS NEEDED	
	0.05% CONCENTRATE	0.1% CONCENTRATE
25	1	2
50	2	4
100	4	8

**MIXING:** Refer to Mixing Table for proper amount of IMI 75 to be used.

Within each foil envelope are clear inner packets containing IMI 75. The clear inner packet is water soluble, Do not allow packets to become wet prior to adding to the spray tank. Do not handle the clear inner packets with wet hands or wet gloves. Rough handling may cause breakage. Reseal foil envelope to protect remaining packets.

To prepare the spray mixture, open the foil envelope and drop the required number of unopened clear water soluble packets 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.

**Note:** IMI 75 packets should not be used with products or in a tank that may 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 or solvents such as diesel oils, kerosene, gasoline or alcohol. Use of chlorinated water is acceptable.

**APPLICATION VOLUME**

It is recommended that application volumes described in the IMI 75 DIRECTIONS FOR USE be used whenever possible. However, where soil conditions will not accept application of 4 gallons of IMI 75 per 10 linear feet twice the IMI 75 concentration may be applied in 2 gallons of solution per 10 linear feet. For example, if 0.05% is the correct use rate to be applied in 4 gallons of water, then 2 gallons of 0.1% dilution may be used per 10 linear feet to deliver an equivalent amount of IMI 75 per unit of soil.

**SUBTERRANEAN TERMITE TREATMENT**

Treatment standards for subterranean termite control may vary due to regulations, treatment procedures, soil types, construction practices and other factors. The purpose of chemical soil treatment for termite control is to establish a continuous chemical treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in the structure and the termite colonies in the soil. Follow all federal, state, and local regulations and treatment standards for protection of a structure from termites. In some instances where an aerial or above ground colony is established, supplemental treatments to control the termites, landscape modifications, and/or structural repairs may be needed to deprive termites of a moisture source. Use a 0.05% to 0.1% dilution based on local recommendations. Generally a 0.05% dilution is used for typical control situations. Where severe or persistent infestations occur, a 0.1% dilution may be used.

**PRE-CONSTRUCTION TREATMENT**

Do not apply at a lower dosage and/or concentration than specified on this label for application prior to installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

**CONCRETE SLAB-ON-GROUND OR BASEMENTS:** Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floor and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution, to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes should be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes should not extend below the footing. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat soil which will be placed in the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Rodding in trench followed by flooding of trench and treatment of backfill may provide a better opportunity to achieve a continuous chemical treated zone than using soil rodding alone to establish a vertical termiticide treated zone.

**CRAWL SPACES:** Application should be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet per foot of depth to provide a uniform treated zone. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes should be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray

to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

**HOLLOW BLOCK FOUNDATIONS OR VOIDS:** Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

#### POST-CONSTRUCTION TREATMENT

**CONCRETE SLAB-ON-GROUND:** To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. **DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS.** Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material. An application should be made by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil as it is being placed in the trench.

Rodding can be done from the bottom of a shallow trench. When rodding, rod holes should be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod hole depth should not extend below the footing.

**BATH TRAPS:** Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas should be treated with 3 gallons of solution per square foot. An access door or inspection vent should be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

**CRAWL SPACES:** When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to Pre-Construction Treatment). If unable to excavate, crawl space soil and wood treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform chemical treated zone. Use a very coarse spray at a pressure not exceeding 25 PSI at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil, wood and structural members contacting the soil at the above rates. Do not apply to inaccessible crawl space areas using pressures greater than 25 PSI at the treatment tool when the valve is open.

Treatment may also be made by drilling through the foundation wall or through the floor above and treating the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform chemical treated zone.

**SHALLOW FOUNDATIONS:** For shallow foundations, one foot or less in depth, dig a narrow trench approximately 6 inches wide and deep along the outside and inside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to the top of footer to provide a uniform treated zone. The dilution should be applied to the trench and mixed with the soil as it is placed in the trench.

**BASEMENTS - OUTSIDE PERIMETER:** Along the outside of the exterior walls, an application must be made by trenching or rodding within the trench. Rodding depth should be to the top of the footer, or to a minimum of 4 feet or according to state or local regulations. When rodding through a trench, dig a narrow trench about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone by rodding through the trench. Use a low pressure spray to treat sod which will be placed into the trench after rodding. Mix spray solution with the soil as it is being placed in the trench.

**BASEMENTS - INSIDE PERIMETER:** If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around sewer pipes, floor drains, conduits, expansion joints or any cracks or holes in the basement floor. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone. Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

**HOLLOW BLOCK FOUNDATION OR VOIDS:** Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

**PLENUMS:** For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing and conduits.



The soil should be treated by trenching to a depth of 6 inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 PSI when measured at the treating tool when valve is on).

When treating plenums, turn on the air circulation system at the structure until application has been completed and all termiticide has been absorbed by the soil.

**TREATMENT AROUND WELLS OR CISTERNS:** Do not contaminate wells or cisterns.

**Structures With Wells/Cisterns Inside Foundations:** Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

1. Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern.

The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

- a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
- b) Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
- c) After the treated soil has absorbed the solution, replace the soil into the trench.

2. Treat infested and/or damaged wood in place using an injection technique such as described in the "Control of Wood Infesting Pests" section of this label.

**Structures With Adjacent Wells / Cisterns and/or Other Water Bodies:**

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from the well to the structure, if the pipe(s) enter the structure within 3 feet of grade.
2. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

### FOAM APPLICATIONS

Construction practices, soil subsidence and other factors may create situations in which a continuous chemical treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices, to provide a continuous treated zone.

Foam application may be made alone or in combination with conventional application methods, provided that the labeled amount of active ingredient per unit area is used.

**Foam Application Use Directions:** Mix solution of IMI 75 with manufacturers recommended volume of foaming agent (see table for foaming recommendations). Apply a sufficient volume of IMI 75 foam alone or in combination with liquid solution to provide a continuous treated zone at the recommended rate for specific application sites. Use appropriate dispersion tips and application method for site.

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, wall voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

**Foam end liquid application must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of IMI 75 must be applied as a typical liquid treatment. The remaining 25% or less gallons is delivered to appropriate locations using a foam application.**

MIXING TABLE FOR IMI 75 FOAM				
IMI 75 PACKETS <sup>a</sup>	GALLONS OF WATER	FOAM EXPANSION RATION	FINISHED FOAM	
			(gallons)	(ai%)
ONE	1	25:1	25	0.05
	2.5	10:1		
	5	5:1		
TWO	1	50:1	50	
	2.5	20:1		
	5	10:1		

<sup>a</sup> Add the manufacturer's recommended quantity of foam agent to the IMI 75 solution.

**NOTE:** When foam is used solely to kill subterranean termites in above ground locations (such as feeding galleries in wooden framing, or in voids with framed walls), and whenever the target pest is other than subterranean termites (drywood termites, beetles, ants, etc.) dilute solutions of IMI 75 may be expanded by foaming without concentrating the IMI 75 solution as previously described for soil applications. Add the manufacturers' recommended volume of foaming agent to produce foam of the desired expansion ratio. Use application tips and methods suitable to the site and pest.

**CONTROL OF WOOD INFESTING PESTS**

For control of **above ground termites and carpenter ants** in localized areas, apply a 0.05 to 0.1% solution or sufficient volume of IMI 75 foam to voids and galleries in damaged wood, and in spaces between wooden structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to inaccessible areas by drilling, and then injecting the suspension or foam with a suitable directional injector into the damaged wood or wall voids. Termite carton nests in building voids may be injected with a 0.05 to 0.1% suspension or foam. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such nests are found. Application to attics, crawl spaces, unfinished basements, or manmade voids may be made with a coarse fan spray of 0.05 to 0.1% solution or foam to control exposed worker and winged reproductive forms of termites or carpenter ants. This type of application is intended to be a supplemental treatment for control of above ground subterranean termites and carpenter ants.

It is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure. This may allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of IMI 75 can be made to these nests.

Use a 0.05% to 0.1% solution to control existing infestations of or to prevent infestation by termites or carpenter ants in trees, utility poles, fencing and decking materials, landscape timbers and similar non- structural wood-to-soil contacts. If possible, locate the interior infested cavity and inject a 0.05 to 0.1% solution or sufficient volume of IMI 75 foam using an appropriate treatment

tool with a splashback guard. These non-structural wood-to-soil contacts may also be treated by applying a solution to the soil as a spot application or continuous treated zone applied as a trench or by rodding around the base of the point(s) of soil contact(s). Rod holes should be placed approximately 3 inches away from the soil contact point(s) and spaced no more than 12 inches along the perimeter of the soil contact(s). For small poles or posts (<6 inches in diameter), apply 1 gallon per foot of depth. For larger constructions, apply 4 gallons per 10 linear feet per foot of depth. Retreat as needed to maintain protection.

Termite carton nests in trees may be injected with a 0.05 to 0.1% solution or sufficient volume of foam using a pointed injection tool. Multiple injection points to varying depths may be necessary. Removal of carton material from trees is desirable but may not be necessary when foam application is used. In some instances, a perimeter application of a 0.05% to 0.1% solution applied to soil around the root flare of the tree may be necessary to prevent reinfestation by termites in the soil. For small trees (<6 inches in diameter), apply 1 gallon of solution. For larger trees, apply 4 gallons per 10 linear feet (measured as the circumference at the root flare).

For protection of **firewood or other wood products** stored in contact with soil from carpenter ants and termites, treat soil prior to stacking with a 0.05 to 0.1% solution at 1 gallon per 10 square feet to prevent infestation. Curative application to the soil around firewood or other wood products stored in contact with soil may be made as described for non-structural wood-to-soil contacts (above).

**Drywood termites and wood-infesting beetles or borers** (such as, but not limited to, powder post beetles, anobiid or deathwatch beetles, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles). **Galleries and structure voids** can be treated with sprays, mists, or foams of a 0.05% to 0.1% IMI 75 solution. Locate galleries by using visual signs (frass or pellets, blistered wood, emergence or clean out holes), the presence of live insects, mechanical sounding techniques, or listening devices (e.g., stethoscopes, acoustic emission detectors). Penetrate the gallery system by drilling holes to receive the injector tip or treatment tool. Distribute drill holes to adequately cover the gallery system. [NOTE: Avoid drilling where electrical wiring, plumbing lines, etc. are located.] Apply IMI 75 solutions as a low pressure (about 20 psi) spray or by misting or, where appropriate, by foaming. It is not necessary to treat to the point where runoff is detected from adjacent holes. [NOTE: Do not apply where electrical shock hazards exist.] Drill holes should be sealed after treatment. Also, **wood surfaces** can be sprayed or misted with a 0.05% to 0.1% solution or, where appropriate, use a sufficient volume of foam. For inaccessible surfaces, drill and treat the interior of structural voids. Surfaces treated may include exposed wooden surfaces in crawlspaces, basements, or attics, wooden exterior surfaces such as decks, fencing, or siding, structural voids, channels in damaged wood, in spaces between wooden members of a structure, and junctions between wood and foundations. Apply by brushing or as a coarse, low pressure (about 20 psi) spray to the wood surface; apply sufficient volume to cover the surface to the point of wetness, but avoid applying to the point of runoff. When spraying overhead in living areas, cover surfaces below the treated area with plastic sheeting or similar material. Avoid contact with treated surfaces until spray deposits have dried. Retreat as needed to maintain protection.

**Localized treatment for carpenter bees:** Apply a 0.05% to 0.1% solution as a spray or mist, or sufficient volume of foam, directly into gallery entrance holes. Following treatment, entrance holes may be plugged with small pieces of steel wool or similar material.

#### RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide treated zone in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this products labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the

effectiveness of the treated zone, Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgment of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment the applicator should consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

**Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.**

**APPLICATION IN CONJUNCTION WITH BORATES OR BAITING SYSTEMS:** When other registered termite control product/system is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas. IMI 75 may be applied as a spot application in a secondary treatment to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks, the outside foundation wall, and areas of known or suspected activity at either a pre-construction or post-construction timing. These secondary treatments must be made applied in amounts and concentration in accordance with label directions relevant to the treatment area(s) to receive the secondary treatment.

#### **PERIMETER PEST CONTROL**

**ANTS:** For control of ants in houses and other structures, apply a 0.05 to 0.1% solution as a general surface, spot, crack and crevice or wall void application. Apply to surfaces on buildings, porches, patios and other structures, around doors and windows, eaves and attic vents, utility entry points, soffit areas, and other exterior openings (including foundation cracks or drilled holes) where these pests enter the structure, or where they crawl or hide. Spray into cracks and crevices, and spray, mist or foam into voids where these ants or their nests are present. Apply the volume of spray, mist or foam sufficient to cover the area, but do not allow excessive dripping or run-off to occur from vertical or overhead surfaces.

Treat soil, turf or ground cover adjacent to the structure where ants are trailing or may find food or harborage. Apply to flower, shrub or ornamental plant beds adjacent to the structure where ants may find food or forage. To control ants tunneling in soil, apply a 0.05 to 0.1% solution as a drench or soil injection at intervals to establish a continuous treated zone. Treat along the edge of walls, driveways or other hard surfaces where ants are tunneling beneath the surface.

**Aerial Nests:** If ant nests are located in tree hollows or non-structural wooden construction (e.g.: posts, fences, decks) treat the interior cavity and-or nest site by injecting a 0.05% to 0.1% solution as a spray mist or sufficient volume of foam

Apply in sufficient water to cover the foliage and soil area being treated. Maximum application is once per month to maintain control.

Do not allow residents or pets into the immediate area during the application or contact with treated areas until spray has dried.

**Do not use this product against native or imported fire ants, pharaoh or harvester ants.**

**NOTE:** Where severe pest pressures may exist and when rapid knockdown or exclusion at pest entry points is desired, supplemental treatments using IMI 75 with targeted applications of a pyrethroid product to doors and windows, utility entry points, and other places where these pests enter the structure. Read and follow all label directions for use of this companion product.

**GENERAL PRECAUTIONS FOR APPLICATIONS**

After treatment, plug and fill all holes drilled in concrete slab areas of the building with a suitable sealant.

Do not apply solution until location of heat pipes, ducts, water and sewer lines and electrical conduits are known and identified. Caution must be taken to avoid puncturing and injection into these structural elements.

Do not plant for the purpose of consumption, edible plants into the treated areas of soil.

Avoid contamination of public and private water supplies.

Use anti-backflow equipment or an air gap on filling hoses.

Consult State, Federal, or local authorities for information regarding the approved treatment practices for areas in close proximity to potable water supplies.

*[See page 20 & 21 for STORAGE AND DISPOSAL and WARRANTY STATEMENTS]*

*[End of TERMITICIDE labeling]*

[labeling for TURFGRASS (INCLUDING SOD FARMS, LANDSCAPE ORNAMENTALS, FRUIT & NUT TREES, AND INTERIOR PLANTSCAPES)]

**IMI 75  
Insecticide in Water Soluble Packets**

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

**ACTIVE INGREDIENT:**

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 75%

**OTHER INGREDIENTS:**.....25%

Total: 100%

Do Not Remove Packets From Container Except For Immediate Use.

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

EPA Reg. No. 53883-XXX

EPA Est No. \_\_\_\_\_

Net Contents \_\_\_\_\_

**STOP - Read the label before use.  
Keep out of reach of children.**

**CAUTION**

**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.)

**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. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

**Personal Protective Equipment (PPE)**

**WPS Uses:** Applicators and other handlers who handle this product for any use covered by the Worker Protection Standard (40 CFR part 170) – in general, agricultural plant use e.g. use on sod farms, must wear:

- Long-sleeved shirt and long pants
- Chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.
- Shoes plus socks

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

**Non-WPS Uses:** Applicators and other handlers who handle this product for any use NOT covered by the Worker Protection Standard (40 CFR part 170) must wear:

- Shirt and pants
- Gloves
- Shoes plus socks

**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.

<b>User Safety Recommendations</b>	
User should:	
<ul style="list-style-type: none"> <li>• Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.</li> <li>• Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.</li> <li>• 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.]</li> </ul>	

<b>FIRST AID</b>	
<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 a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</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 soap and water for 15 to 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 to 20 minutes. 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>
In case of emergency call Poison Control Center at 800-222-1222. Have a product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>Note To Physician:</b> No specific antidote is available. Treat the patient symptomatically.	

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on 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.

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

**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 applied by drenching, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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

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

**NON-AGRICULTURAL USE REQUIREMENTS**

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Keep children and pets off treated area until dry.

**TURFGRASS (INCLUDING SOD FARMS, LANDSCAPE ORNAMENTALS, FRUIT & NUT TREES, AND INTERIOR PLANTSCAPES)**

**MIXING:** Inside each foil pouch is a clear inner **water soluble** packet containing the IMI 75. Do not allow packets to become wet prior to adding to the spray 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 spray mixture, remove the outer foil pouch and drop the required number of **unopened** clear water soluble packets, as determined under **Recommended Applications**, into the spray tank while filling with water to the desired level. Operate the agitator while mixing. Depending on water temperature and amount of agitation, the packets should completely dissolve within a few minutes after they are added to the water. Allow longer time for the clear packet to dissolve when using cooler water.



**NOTE:** Do not use IMI 75 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 or solvents such as diesel oils, kerosene, gasoline or alcohol. Do not attempt to use the packets directly in diesel oils or summer spray type oils as in ULV or LV uses. PVA packets are water soluble not oil soluble. Use of chlorinated water is acceptable.

IMI 75 has been found to be compatible with commonly used fungicides, miticides, liquid fertilizers, and other commonly used insecticides. Check physical compatibility using the correct proportion of products in a small jar test if local experience is unavailable.

Do not apply through any irrigation system.

### **RESTRICTIONS**

Do not graze treated areas or use clippings from treated areas for feed or forage. Avoid runoff or puddling of irrigation water following application. Keep children and pets off treated area until dry. Avoid application of IMI 75 to areas which are water logged or saturated, or frozen, which will not allow penetration into the root zone of the plant.

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.

**NOTE:** Not for use in commercial greenhouses, nurseries, or on grasses grown for seed, or on commercial fruit and nut trees.

### **TURFGRASS**

IMI 75 can be used as directed on turfgrass in sites such as home lawns, business and office complexes, shopping centers, residential complexes, golf courses, airports, cemeteries, parks, playgrounds, athletic fields and sod farms to control soil inhabiting pests as listed in the table below.

Effective control can be achieved when applications are made before or during the egg laying period. The timing of applications can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. For best control apply prior to egg hatch of the target pests, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

**NOTE:** For best results, irrigation or rainfall should occur within 24 hours after application to move the active ingredient through the thatch. Do not make applications when turfgrass areas are waterlogged or the soil is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist. The area to be treated must be able to accept vertical penetration of rainfall or irrigation water. Avoid mowing turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.

Do not apply more 8.6 oz. (0.4 lb of active ingredient) per acre per year.

### **APPLICATION INSTRUCTIONS**

Apply IMI 75 in sufficient water to provide adequate distribution in the treated area. The use of accurately calibrated equipment normally used for the application of turfgrass 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.

Consult your local State Agricultural Experiment Station, or State Extension Turf Specialists for more specific information regarding timing of application.

RECOMMENDED APPLICATIONS ON TURFGRASS		
PEST	USE DIRECTIONS	RATE
<p><b>Larvae of:</b>                      European Crane Fly, (<i>Tipula paludosa</i>);                      Annual bluegrass weevil, (<i>Hyperodes</i> spp.);                      Green June Beetle, (<i>Cotinis nitida</i>);                      May or June beetle, (<i>Phyllophaga</i> spp.);                      Asiatic garden beetle, (<i>Maladera castanea</i>);                      Japanese Beetle, (<i>Popillia japonica</i>);                      Billbug, (<i>Spherophorus</i> spp.);                      Northern masked chafer and Southern masked chafer, (<i>Cyclocephala borealis</i>, <i>C. immaculata</i>, and/or <i>C. lurida</i>);                      Black turfgrass ataenius, (<i>Ataenius spretulus</i> and <i>Aphodius</i> spp.);                      Oriental Beetle, (<i>Anomala orientalis</i>);                      Cutworms (suppression), (<i>Phyllophaga</i> spp.);                      European chafer, (<i>Rhizotroqus majalis</i>)</p>	<p>For best results, for the control of grubs, billbugs, European crane fly and annual bluegrass weevil, make application prior to egg hatch of the target pest.</p> <p>Refer to "Application Instructions" section of the label.</p>	<p>1.6 oz. (1 packet)                      per 8,250 to 11,000                      sq. ft.</p>
<p>Chinchbug (suppression)                      Mole Crickets, (<i>Scapteriscus</i> spp.)</p>	<p>For suppression of chinchbugs, make application prior to hatching of the instar nymphs.</p> <p>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, application should be accompanied by a curative insecticide. Follow label instructions for other insecticides when tank-mixing.</p>	<p>1.6 oz. (1 packet)                      per 8,250</p>

**ORNAMENTALS**

IMI 75 is for use on ornamentals in commercial and residential landscapes and interior plantscapes.

**FOLIAR APPLICATIONS**

IMI 75 mixes with water and may be used in a variety of application equipment. Mix product with the required amount of water and apply as directed for the selected use pattern.

When making foliar applications on hard to wet foliage such as holly, pine, or ivy, the addition of a spreader/sticker is recommended. If concentrate or mist type spray equipment is used, an equivalent amount of product should be used on the area sprayed, as would be used in a dilute application.

**APPLICATION INSTRUCTIONS**

IMI 75 is a systemic product and will be translocated upward into the plant system from root uptake. To best results, place the product where the growing portion of the target plant can

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absorb the active ingredient. The addition of a nitrogen containing fertilizer, where applicable, into the solution may enhance the uptake of the active ingredient. Application can be made by foliar application or soil applications; including soil injection, drenches, and broadcast sprays. Foliar applications offer locally systemic activity against insect pests.

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

For outdoor ornamentals, **broadcast applications** cannot exceed a total of 8.6 oz (0.4 lb of active ingredient) per acre per year.

**Ant Management Programs**

Use IMI 75 to control aphids, scale insects, mealybugs and other sucking pests on ornamentals to limit the honeydew available as a food source for ant populations. IMI 75 applications can be then be supplemented with residual sprays, bait placements or other ant control tactics to further reduce the pest population.

RECOMMENDED APPLICATIONS		
Trees, Shrubs, Evergreens, Flowers, Foliage Plants, Ground Covers, and Interior Plantscapes		
For use only in and around industrial and commercial buildings and residential areas.		
PEST	RATE	INSTRUCTIONS
Adelgids Aphids Japanese beetles Lace bugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassywinged sharpshooter) Mealybugs Psyllids Sawfly larvae Thrips (suppression) Whiteflies	1.6 oz. (1 packet ) per 300 gals. of water	<b>Foliar Applications:</b> Start treatments prior to establishment of high pest populations and reapply on an as needed basis.
White grub larvae (such as Japanese beetle larvae, Chafers, <i>Phyllophaga</i> spp. Asiatic garden beetle, Oriental beetle)	1.6 oz. (1 packet) per 8,250 to 11,000 sq. ft.	<b>Broadcast Applications:</b> 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 IMI 75 into the upper soil profile. Refer to FLOWERS and GROUNDCOVERS for additional use directions.

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<b>RECOMMENDED APPLICATIONS</b> <b>Trees, Shrubs, Flowers and Groundcovers</b> <b>For use only in and around industrial and commercial buildings and residential areas and state, national, and private wooded and forested areas to control the insect pests listed below.</b>		
PEST	CROP/RATE	INSTRUCTIONS
Adelgids Aphids Armored scales (suppression) Black vine weevil larvae Eucalyptus longhorned borer Flatheaded borers (including bronze birch borer and alder borer) Japanese beetles Lace bugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassywinged sharpshooter) Leafminers Mealybugs Pine tip moth larvae Royal Palm Bugs Sawfly larvae Soft Scales Thrips (suppression) White grub larvae Whiteflies	<b>TREES</b>  1.6 oz. (1 packet ) per 24 to 48 inches of cumulative trunk diameter	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.  <b>SOIL INJECTION<sup>1</sup>:</b> For application to trees - 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.  For application to shrubs - Apply to individual plants using dosage indicated.
	<b>SHRUBS</b>  1.6 oz. (1 packet ) per 24 to 48 inches of cumulative shrub height	<b>SOIL DRENCH:</b> 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.  <b>For Control of Specified Borers:</b> Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing peat damage and tree stress.
	<b>FLOWERS &amp; GROUNDCOVERS</b>  1.6 oz. (1 packet) per 8,250 to 11,000 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.
<sup>1</sup> No Soil Injection Applications Allowed in Nassau or Suffolk Counties of New York.		

RECOMMENDED APPLICATIONS			
For use only in and around residential areas.			
CROP	PEST	RATE	INSTRUCTIONS
<b>POME FRUIT:</b> Apple, Crabapple, Loquat, Mayhew, Pear, Pear (Oriental), Quince	Aphids (except Woolly apply aphid) Leafhoppers (including glassywinged sharpshooter) Leafminer Mealybugs <sup>2</sup> San Jose Scale <sup>2</sup>	1.6 oz. (1 packet) per 300 gals. of water (2.1 oz. per acre <sup>1</sup> )	<p>Apply specified dosage as foliar spray as needed after petal-fall is complete.</p> <p>For control of <b>rosy apple aphid</b>, apply prior to leafrolling caused by the pest.</p> <p>For first generation <b>leafminer</b> control, make first application as soon as petal-fall is complete. Greatest control will result from the earliest possible application. For second and succeeding generations, best control is obtained from applications made early in the adult flight against egg and early instar larvae. A second application may be required 10 days later if severe pressure continues or if generations are overlapping. A single application may result in suppression only. IMI 75 will not control late stage larvae.</p> <p>For <b>San Jose Scale</b>, time applications to the crawler stages. Treat each generation.</p> <p>For late season (preharvest) control of <b>leafhopper species</b>, apply IMI 75 while most leafhoppers are in the nymphal stage.</p> <p>For optimal control of <b>mealybug</b>, insure good spray coverage of the trunk and scaffolding limbs or other resting sites.</p> <p>Do not apply more than 2.1 ounces per acre in a single application. Do not make more than 5 applications.</p> <p>Allow 10 or more days between applications. Allow at least 7 days between last application and harvest.</p>
Pecan <sup>3</sup>	Yellow pecan Aphid Black margined Aphid Pecan leaf phylloxera Pecan Spittlebug Pecan stem phylloxera	1.6 oz. (1 packet) per 300 gals. of water (2.1 oz. per acre <sup>1</sup> )	<p>Make foliar applications as pests begin to build before populations become extreme. Two applications at a 10 to 14 day interval may be required to achieve control. Scout and retreat if needed.</p> <p>Thorough uniform coverage of foliage is necessary for optimal control. Addition of an organosilicone-based spray adjuvant at a rate not to exceed the adjuvant manufacturer's recommended use rate may improve coverage.</p> <p>Do not apply more than a total of 6.3 ounces of IMI 75 per acre per year. Do not make more than 3 applications. Allow 10 or more days between applications.</p>
<p><sup>1</sup> The amount of IMI 75 required per acre will depend on tree size and volume of foliage present. The rate per acre is based on a standard of 400 gallons of dilute spray solution per acre for large trees.</p> <p><sup>2</sup> Not for use in California for control on pears.</p> <p><sup>3</sup> Use on pecans not permitted in California unless directed by specific supplemental labeling.</p>			

RECOMMENDED APPLICATIONS			
For use only in and around industrial and commercial buildings and residential areas.			
CROP	PEST	RATE	INSTRUCTIONS
Grapes	Leafhoppers (including glassy-winged sharpshooter) Mealybugs	1.6 oz. (1 packet) per 300 gal. of water  (1.0 oz. per acre)	Apply specified dosage as a foliar spray using 200 gallons of water per acre. Do not apply more than a total of 2.0 ounces of IMI 75 per acre per year. Allow at least 14 days between applications. Applications may be applied up to and including day of harvest.

[See STORAGE AND DISPOSAL & WARRANTY STATEMENTS below]

[End of labeling for TURFGRASS (INCLUDING SOD FARMS, LANDSCAPE ORNAMENTALS, FRUIT & NUT TREES, AND INTERIOR PLANTSCAPES)]

[language for both labels]

STORAGE AND DISPOSAL
<p>Do not contaminate water, food, or feed by storage or disposal.</p> <p><b>Pesticide Storage:</b> 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. Do not store below freezing (32°F). Exposure to moisture or excessive handling of water soluble packets may cause breakage. Store water soluble packets in original container and out of reach of children, preferably in a locked storage area.</p> <p>Handle and open container carefully. Do not cut water soluble packets when opening. If container is leaking or material 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 below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC (800-424-9300) for decontamination procedures or any other assistance that may be necessary.</p> <p><b>Pesticide Disposal:</b> Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.</p> <p><b>Container Disposal:</b> Completely empty container into application equipment. Then 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.</p>

**IMPORTANT READ BEFORE USE**

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of liability before using this product.

If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following conditions disclaimer of warranties and limitations of liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and should be followed carefully. However, because of manner of use and other factors beyond Control Solutions Inc.'s (CSI) control it is impossible for Control Solutions Inc. to eliminate all risks associated with the use of this product. As a result, crop injury or ineffectiveness is always possible. All such risks shall be assumed by the user or buyer.

**WARRANTY STATEMENT**

Control Solutions, Inc. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Control Solutions, Inc. To the extent allowed by law, Control Solutions,

Inc. shall in no event be liable for consequential, special, or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. In addition to the foregoing, no purchaser of this product (other than an end user) shall be entitled to any reimbursement for any loss suffered as a result of any suspension or cancellation of the registration for this product by the U.S. Environmental Protection Agency. Except, as expressly provided herein, Control Solutions, Inc. makes no warranties, guarantees, or representations of any kind, either expressed or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including, but not limited to merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage. The exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damage resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall be damages not exceeding the purchase price paid for this product or, at Control Solutions, Inc. election, the replacement of this product.

**Control Solutions, Inc.  
5903 Genoa-Red Bluff  
Pasadena, TX 77507**

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[Label text to be printed on Water Soluble Packets]

**IMI 75**  
**Insecticide in Water Soluble Packets**

**ACTIVE INGREDIENT:**

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 75%

**OTHER INGREDIENTS:**..... 25%

Total: 100%

**Keep out of reach of children.**

**CAUTION**

Please refer to product labeling for additional  
Precautionary Statements and complete Directions for Use.