

53883-204

6-21-2007

1/8



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Joe Blake  
Director, Regulatory Affairs  
Control Solutions, Incorporated  
5903 Genoa-Red Bluff  
Pasadena, TX 7507-1041

JUN 21 2007

RE: Notification for Optional Marketing Language and Graphics  
EPA Registration Number: 53883-204  
Date of Submission: May 16, 2007

Dear Mr. Blake:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated May 16, 200, for the product IMI 0.22% G Ready-to-Spread Granules. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

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



**C O N T R O L**  
**S O L U T I O N S**  
i n c o r p o r a t e d

May 16, 2007

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
One Potomac Yard  
277 S. Crystal Drive  
Arlington, VA 22202

Re: Notification of Optional Marketing Language per (PR) Notice 98-10  
EPA Reg. No. 53883-204

Dear Sir or Madam:

Enclosed is a Notification of Optional Marketing Language required by the state of New York, and the inclusion of graphics/grub life cycle language per PR Notice 98-10. Please see underlined areas on front page and graphics on final page.

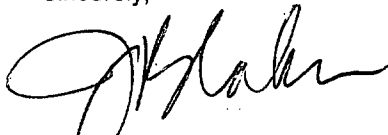
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false 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 sections 12 and 14 of FIFRA.

Enclosed please find:

1. Application for Pesticide (EPA Form 8570-1)
2. Two copies of marked labeling

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,



Joe Blake  
Director, Regulatory Affairs

3/8



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 53883 - 204	2. EPA Product Manager Dani Daniel	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMI 0.22% G Ready-to-Spread Granules	PM#	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <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 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 Optional Marketing Language and Graphics per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other 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 USC 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 sections 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 type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input 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 Joe Blake	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 800-242-5562
<b>Certification</b> 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  <b>(Stamped)</b>
2. Signature 	3. Title Director, Regulatory Affairs	
4. Typed Name Joe Blake	5. Date 05-16-07	

4/8

Optional Marketing Statements bracketed [ ]

# IMI 0.22% G

## Ready-To-Spread Granules

For use on Lawns, Ground Covers, Flower Beds, and Around Trees & Shrubs.  
Kills Grubs, European Crane Fly Larvae and Mole Crickets.

[Treats up to 5,000 sq. ft.]  
[Treats up to 3,775 square feet for Mole Crickets]  
[One application kills grubs [including] [larvae of] [Asiatic Garden Beetle], [Black Turfgrass Ataenius], [Chafers], [Japanese Beetle], [May or June Beetle], [and] [Oriental Beetle] all season long.]  
[Apply anytime spring through late summer.]  
[Apply anytime from May through mid-August]  
[One application kills [White] [Grubs] [and] [European Crane Fly Larvae] all season long.]  
[Kills [White] [Grubs] [and] [European Crane Fly Larvae] before they damage lawns.]  
[Easy-to-Use Granules]  
[Kills Grubs Now, Prevents Them All Season Long!]  
[Not for sale, sale into, distribution and/or use in Nassau, Suffolk, Kings and Queens counties, New York.]  
[Grub life cycle and graphics] (see last page for graphics)

### ACTIVE INGREDIENT:

Imidacloprid (CAS# 138261-41-3)..... 0.22%

INERT INGREDIENTS: ..... 99.78%

**TOTAL:** 100.00%

KEEP OUT OF REACH OF CHILDREN

### CAUTION

See [back panel] [booklet] for additional precautionary statements.

EPA Reg. No. 53883-204

EPA Est. No. XXXX-XX-XX

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

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**Caution:** Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

FIRST AID	
Have product container or label with you when calling a poison control center or doctor, or going for treatment.	
If swallowed:	<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>
If on skin or clothing:	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If in eyes:	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>

5/8

In case of a medical emergency call Poison Control Center at 800-222-1222.

### ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

### DIRECTIONS FOR USE

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

Do not apply near fish pools, ponds, streams or lakes. Do not use in vegetable gardens.

### GENERAL INFORMATION

**IMI 0.22% G** is for use on lawns, flower beds, ground covers, trees and shrubs to control White Grubs (including larvae of Asiatic Garden Beetle, Black Turfgrass Ataenius, Chafers, Japanese Beetle, May or June Beetle, and Oriental Beetle), Mole Crickets and European Crane Fly Larvae.

For best results, apply **IMI 0.22% G** before grubs, mole crickets or European crane fly larvae hatch and can cause any damage. Contact your County Extension Agent for the best dates to apply in your area.

Pests Controlled	When to Apply	Indication of Damage
Grubs	Apply once anytime from May through mid-August.	White grubs cause widespread damage to lawns by feeding on grass roots, causing it to turn yellow, then brown and die.
European crane fly larvae	Apply once, when these insects are present in large numbers, late summer to mid-fall.	European crane fly larvae cause damage by feeding on grass roots and disturbing the soil surface.
Mole Crickets	Apply once anytime from mid-May through mid-June. Florida residents- Apply once anytime between early April through early May.	Mole crickets cause widespread damage by tunneling through the soil, while some species also feed on roots. Tunneling through the soil uproots the grass causing it to dry out, become thin and weedy, turn yellow and eventually die.

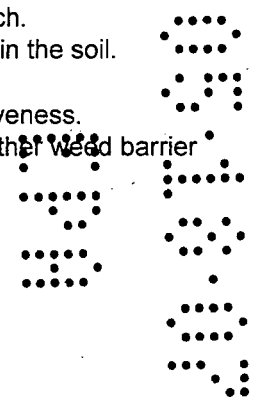
### LAWNS

#### Application Instructions

See **Spreader Settings** chart below. Adjust spreader to the appropriate setting. Make sure that the spreader works properly and spreads granules uniformly. Apply to the border and then fill in the center to ensure the entire area is covered completely. To make sure that the product is evenly distributed, walk at a steady pace making parallel passes. Do not use a spreader that applies granules in narrow, concentrated or uneven bands. Water thoroughly after application.

For best results:

- Apply early before grubs, mole crickets and European crane fly larvae hatch.
- Irrigate thoroughly within 24 hours of application to form a protective zone in the soil.
- Avoid mowing until granules are watered into the soil.
- Do not apply to water saturated areas. This may decrease product effectiveness.
- **IMI 0.22% G** can be applied over soil or mulch. Remove black plastic or other weed barrier material prior to application.



Keep children and pets off treated area until it has dried.

6/8

**FLOWER BEDS, GROUND COVERS, TREES AND SHRUBS**

**Application Instructions**

Apply IMI 0.22% G at the rate of 2 tablespoons per 10 square feet of planting bed (1 ¼ cups per 100 square feet of planting bed). Evenly spread granules to the soil over flower beds, ground cover plantings, shrub beds and under trees. The use of a hand-held spreader is recommended. Rake granules into the soil around plants. Water thoroughly after application.

**Spreader Settings\***

Rate for Grubs and European Crane Fly Larvae: 2.87 lbs. per 1,000 square feet.

Rate for Mole Crickets: 3.8 lbs. per 1,000 square feet.

Broadcast Spreaders Model	2.87 lb. rate Setting	3.8 lb. rate Setting	Distance Between Passes (ft.)
Cyclone Rotary			
Earthway Rotary			
EV-N Speed			
K-Gro Rotary			
Ortho Rotary			
Precision Rotary (#SB50)			
Red Devil Rotary	Spreader settings available at printing		
Republic EZ Rotary (#540)			
Scotts Easygreen (#EG-3)			
Scotts Speedygreen 1000			
Scotts Speedygreen 2000			
Scotts Speedygreen 3000			
Sears Rotary			
True Temper Rotary			
Vigoro Rotary			
Drop Spreaders Model	2.87 lb. rate Setting	3.8 lb. rate Setting	Distance Between Passes (ft.)
Amzs Drop			
K-Gro Drop			
Ortho Drop			
Precision Drop (#FH22G)			
Red Devil Drop	Spreader settings available at printing		
Republic EZ Drop (#530)			
Scotts Accugreen 1000			
Scotts Accugreen 2000			
Scotts Accugreen 3000			
Scotts Drop (#PF1, PF2, PF3, PF4)			
Sears Drop			
Sta-Green Drop			
Vigoro Drop			
*Spreader settings are approximate. The condition of your spreader, the speed that you walk, and uneven terrain may affect the rate of application. Calibrate your spreader according to manufacturer's instructions. TIP: 1,000 sq. ft. = 20 ft. x 50 ft.			

**STORAGE AND DISPOSAL**

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

**Pesticide Storage:** Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet. Protect from freezing.

**Pesticide Disposal:** Do not reuse empty container. *[Directions for plastic container: - Rinse the empty product container thoroughly and disperse the rinse water around the tree or shrub as a part of the treatment.]* Place empty container in trash.

**IMPORTANT:** It is best to use the entire product in accordance with label directions. Never pour insecticide down a drain or storm sewer. If it is necessary to dispose of unused product, please follow any applicable state and local guidelines.



7/8

**IMPORTANT: READ BEFORE USE**

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

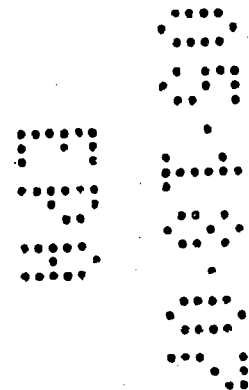
If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond Control Solutions, Inc.'s 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.

**DISCLAIMER OF WARRANTIES:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, CONTROL SOLUTIONS, INC. MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Control Solutions, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. Control Solutions, Inc. disclaims any liability whatsoever for special, incidental or consequential damages, resulting from the use or handling of this product.

**LIMITATIONS OF LIABILITY:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT CONTROL SOLUTIONS, INC.'S ELECTION, THE REPLACEMENT OF PRODUCT.

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



8/8

[Grub life cycle and graphics] (optional marketing language)

**Lifecycle of the Grub**

	<b>MARCH - MAY</b>		<b>JUNE - JULY</b>		<b>AUGUST - OCTOBER</b>	
	<i>In spring, grubs awake from hibernation to feed on grass roots, destroying your lawn.</i>		<i>In summer, larvae emerge to feed on your garden...</i>		<i>By fall, eggs hatch into grubs, which starts the destruction cycle over again...</i>	
	<i>Grubs change into pupae in late spring.</i>		<i>...and lay their eggs.</i>		<i>...by feeding on your lawn's roots.</i>	

