

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 2 8 2008

Ms. Jane M. Miller Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507

Subject:

Amended to Include Additional Use Sites and Directions

IMI 1.47% Concentrate EPA Reg. No. 53883-205

Your Submission dated January 18, 2008

Dear Ms. Miller:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable provided the following is done:

- Reverse the order of First Aid statement in the same order as the Hazard to
 Humans and Domestics Animals statement. If in Eyes first being followed
 by If Swallowed.
- Revise the last sentence of the **Precautionary Statement** to read as: "Wash thoroughly...or using tobacco, using the toilet. Remove and wash contaminated clothing before reuse".
- Note the restriction from the sited label for the addition of the pest armyworm and cutworms which reads as follows: Do not irrigate treated areas within 24 hours after application of this product.
- Change the word "should" to the word "must" in the first sentence of the Warranty Conditions.

A stamped copy is enclosed for your records. Submit two (2) copies of your final printed labeling before you release the product for shipment. If there are questions call me at 703 305-5409.

Sincerely,

Dani Daniel Insecticide –Rodenticide Branch Registration Division 7505C

1.47%

IMI 1.47% Concentrate

[ROOM FOR OPTIONAL MARKETING STATEMENTS]

For Outdoor Residential Use Only.

NOT FOR SALE, USE OR DISTRIBUTION IN or INTO Nassau, Suffolk, Kings or Queens Counties, New York

ACTIVE INGREDIENT:

 R INGREDIENTS:
 98.53%

 TOTAL:
 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the Poison Control Center 800-222-1222.			
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 the poison control center or doctor. Do not give anything by mouth to an unconscious person. 		
 Hold eye open and rinse slowly and gently with water for 15-20 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. 			
Note to Physician: No specific antidote is available. Treat the patient symptomatically.			

See Back Panel Booklet for Additional Ingredients and Precautionary Statements

A Reg. No. 53883-205

ACCEPTED

with COMMENTS In EPA Letter Dated:

APR 2 8 2008

Under the Federal Insecticide, Fungicide, and Rodenticide Act. as amended, for the pesticide registered under EPA Reg. No. EPA Est. No. 53883-TX-02

Net Contents:

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PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not apply directly to lakes, streams or ponds. Do not dump rinse water into sewers or other bodies of water. This pesticide is highly toxic to bees. Do not apply **IMI 1.47% Concentrate** when bees are active. Apply this product only as specified on this label.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. For best results, be sure to read and follow all label directions. Shake well before using.

NOTE:

- · Read and follow directions when using.
- Do not spray the product into fish pools, ponds, streams, or lakes.
- · Remove animal feeding dishes prior to application.

LAWNS

General Information

IMI 1.47% Concentrate kills White Grubs, Mole Crickets, European Crane Fly Larvae and other pests listed in the table below. IMI 1.47% Concentrate forms a protective barrier in the soil which provides control of listed pests all season long. When applied early, IMI 1.47% Concentrate kills grubs, mole crickets and European crane fly before they hatch and damage lawns. Contact your County Extension Agent for the best dates to apply in your area. IMI 1.47% Concentrate may be sprayed over soil or mulch. Remove weed barrier before applying.

Use on lawns and yards including the following grasses:

Cool season or Northern lawns	Warm season or Southern lawns
Kentucky bluegrass,	Bermudagrass, Common and hybrid
Perennial ryegrass,	Centipedegrass
Tall fescue, fescues (red or fine leaf)	St. Augustinegrass
,	Zoysiagrass
	Buffalograss
	Bahiagrass

Pests Controlled

Pest	Indication of Damage to Lawns	
Adelgids European crane fly larvae often cause		
Annual bluegrass Weevil	feeding on grass roots and disrupting the soil	
Aphids	surface.	
Billbugs	000000 00000 000000 0000000 0000000000	
Bluegrass Weevils	Mole crickets often cause extensive damage by	
Chinch bug (suppression)	tunneling through lawns. Some species also feed	
Cutworms (suppression)	on roots. Tunneling uproots the grass so it easily	
Elm leaf beetle	dries out. Lawns turn yellow, become thin, weedy	
European crane fly larvae	and can eventually die.	
Lacebugs	, 0 c	
Leafhoppers	White grubs cause extensive damage to lawns ອັງັ	
Leafminers	feeding on grass roots. Grass turns yellow, then	

Mealybugs	brown and dies. Grubs chew off roots so that the
Mole crickets	grass is easily pulled up in pieces in your hands.
Sawfly larvae	You can roll it back like a carpet to reveal the
Sod webworm	grubs. If patches of dead grass appeared in your
Thrips	lawn late last summer, check for grubs.
Whiteflies	
White Grubs (including larvae of Asiatic	
Garden Beetle, Black Turfgrass Ataenuis,	
Chafers, Japanese Beetle, May or June	
Beetle, and Oriental Beetle)	

Application Instructions

- For White grub control in Northern lawns, applications should be made May.
- For White grub control in Southern lawns, applications should be made from May to early June.

Contact your State Agricultural Extension Service agents for additional recommendations for your area.

NOTE: Do not exceed one application of IMI 1.47% Concentrate per season for lawns.

Ready-To-Spray Instructions

IMI 1.47% Concentrate is a ready-to-spray formulation. Attach the bottle to your garden hose according to the directions below. Water will mix with the IMI 1.47% Concentrate as you spray.

- 1. Measure area to be sprayed. Calculate "square feet" by multiplying length times width. This [32 fl. oz.] container will cover up to 5,333 sq. ft.
- 2. Make sure sprayer knob control lever is in "OFF" position, then connect sprayer to garden hose.
- 3. When spraying turf and other low foliage, twist sprayer hood to the "Fan" position for more uniform coverage.
- 4. Turn water on at faucet. To begin spraying, turn [rotate] knob control lever to "ON" position. The product mixes automatically with the water as you spray.
- 5. To stop spraying, turn [rotate] knob control lever to the "OFF" position. Turn off water at the faucet. To relieve pressure, turn [rotate] knob control lever to the "ON" position and point the sprayer away from any desirable plants before disconnecting the spray nozzle from the garden hose.

Spray evenly over the measured area. [32 fl. oz. covers approximately 5,333 sq. ft]. For heavier infestations, use 32 fl. oz. to treat 3,560 sq. ft.

NOTE:

- Children and pets may re-enter the treated area after the spray has dried.
- · Do not water lawn within one hour after applying.
- Avoid applying IMI 1.47% Concentrate to waterlogged areas, as product effectiveness may be diminished.
- For grub (larvae) control, ½ inch of rainfall or irrigations should occur within 24 hours after application. Thoroughly wet the lawn a few hours after application.
- For armyworm and cutworm control, do not irrigate treated areas within 24 hours after application.
- · Avoid mowing treated lawn until after adequate rainfall or irrigation has occurred.

Hand-Operated Sprayers

Including backpack, compression, knapsack or tank type sprayers and low pressure boom sprayers.

For lawns, mix 2 to 3 fl. oz. of **IMI 1.47% Concentrate** per one (1.0) gallon of water for treating approximately 333 sq. ft. of lawn. Use the higher rate for heavier infestations of insect pests.

Gallons of Water	Fluid ounces (fl. oz.) of IMI 1.47% Concentrate	Tablespoons (tbs.) of product	Area to be treated (sq. ft.)
1 gallon	2.0 – 3.0 fl. oz.	4 – 6 lbs.	333 sq. ft.
2 gallons	4.0 – 6.0 fl. oz.	8 – 12 lbs.	666 sq. ft.
3 gallons	6.0 – 9.0 fl. oz.	12 – 18 lbs.	1,000 sq. ft.

^{1.0} fl. oz. = 2 tablespoons

For one (1) gallon retail containers:

For lawn using low pressure boom sprayers, mix 6.0 fl. oz. of **IMI 1.47% Concentrate** per 1,000 sq. ft. of lawn. Use a spray volume of 2.5 gallons per 1,000 sq. ft. of lawn. Additional spray preparation instructions are presented in the following table. NOTE: Amounts can be varied as indicated above as long as resulting spray amount is between 6 to 9 fl. oz. product per 1,000 sq. ft.

Gallons of water	Fluid ounces (fl. oz.) of IMI 1.47% Concentrate	Are to be treated (sq. ft.)
2.5 gallons	6.0 fl. oz.	1,000 sq. ft.
5 gallons	12 fl. oz.	2,000 sg. ft.
10 gallons	24 fl. oz.	4,000 sq. ft.
12.5 gallons	30 fl. oz.	5,000 sq. ft.
25 gallons	60 fl. oz.	10,000 sq. ft. or 0.23 acre
53 gallons	128 fl. oz. (1 gallon)	21,333 sq. ft. or 0.5 acre

¹ gallon = 128 fl. oz. = 4 quarts = 16 cups

ESTABLISHED ORNAMENTALS IN RESIDENTIAL AREAS

General Information

IMI 1.47% Concentrate is for use on outdoor trees, shrubs and groundcovers in landscape plantings as listed in the table below:

Landscape Plantings	Types of Plants
Roses, flowers, bedding plants and flowering shrubs	Azalea, begonia, camellia, cherry laurel, geranium, gardenia, hydrangea, impatiens, ligustrum, peonies, primrose, tea roses, salvia, zinnias and similar herbaceous plants
Evergreen and leafy shrubs and woody ornamentals	Arborvitae, boxwood, cotoneaster, euonymus, holly, juniper, laurel, privet, spruce yews and similar plants
Groundcovers	English ivy, Dichondra, ivy, pachysandra, vinca and other similar plants

IMI 1.47% Concentrate is for use to kill the pests listed in the table below on outdoor trees and shrubs.

Pests Controlled			
Adelgids	Leafhoppers (incl. Glassy-winged		
Aphids	Sharpshooters)		
Black Vine Weevil Larvae	Leafminers (incl. Birch Leafminers)		
Roundheaded Borers (incl. Asian Longhorned	Mealybugs		
Beetles and Eucalyptus Longhorned Borers)	Pine Tip Moth Larvae		
Flatheaded Borers (incl. Bronze Birch, Alder	Psyllids		
Borers	Royal Palm Bugs		

¹ quart = 32 fl. oz. = 4 cups

and Emerald Ash Borer)	Sawfly Larvae
Japanese Beetles (Adult)	Scales (incl. Armored Scale [suppression]
Lacebugs	and Soft Scale)
Leaf Beetles (incl. Elm Leaf Beetles and	Thrips
Viburnum Leaf Beetles)	Whiteflies

Foliar Applications

Use **IMI 1.47% Concentrate** as a foliar spray to provide contact control of larvae, nymphs or adults of the following insect pests: adelgids, aphids, Japanese beetles, lace bugs, leaf beetles (including elm leaf beetles and viburnum leaf beetles), leafhoppers (including glassy-winged sharpshooter), mealybugs, psyllids, sawfly larvae, thrips (suppression) and whiteflies.

Application Instructions

Apply when insects first appear and before high pest populations are established. Retreat when re-infestation occurs, when high pest pressure is observed or repeat applications on an asneeded basis with 10-14 day intervals between applications.

How to Apply

Foliar applications with water should be made as a thorough cover spray to provide uniform distribution. Spray to wet all foliage (leaves, stems and branches). Target the undersides of the leaves and try to penetrate dense foliage with the spray droplets.

Ready-To-Spray Instructions

- 1. Make sure knob control lever is in "OFF" position, then connect sprayer to garden hose.
- 2. When spraying low growing groundcovers and small shrubs, twist the sprayer hood to the "FAN" position. When spraying taller trees, shrubs and ornamentals, twist the sprayer hood to the "STREAM" position for extended reach and more uniform coverage.
- 3. Turn water on at faucet. To begin spraying, turn [rotate] knob control lever to "ON" position. The product mixes automatically with the water as you spray.
- 4. To stop spraying, turn [rotate] knob control lever to the "OFF" position. Turn off water at the faucet. To relieve pressure, turn [rotate] knob control lever to the "ON" position and point the sprayer away from any desirable plants before disconnecting the spray nozzle from the garden hose.

Hand-Operated Sprayers

Including backpack, compression, knapsack or tank type sprayers.

For foliar applications mix 1.5 (1.1/2) teaspoons (tsp) of IMI 1.47% Concentrate per one (1) gallon of water.

Spray Volume Gallons of Water	Tablespoons (tbs.) of product	Tablespoons (tbs.) of product
1 gallon	1 ½ tsp.	½ tbs.
2 gallons	3 tsp.	1 tbs.
3 gallons	4 ½ tsp.	1 ½ tbs.

^{1.0} fl. oz. = 2 tablespoons = 6 teaspoons (tsp.)

Hose-End Sprayer Instructions [For Gilmour Dial-A-Mix Sprayer or Air-O-Matic]

- 1. Set the dial to 1 ½ teaspoons (tsp.). Keep the dial set to this setting while spraying.
- 2. Add an adequate amount of product to the spray bottle to treat the total area. Do not add water to jar.
- 3. Spray to wet all foliage and direct the spray droplets for an even distribution on the target plants. Any unused product can be poured back into its original container.

Soil Applications

Soil application of **IMI 1.47% Concentrate** provides systemic activity and longer residual control as compared to foliar applications. **IMI 1.47% Concentrate** may be used on bedding plants, flowers, trees, shrubs, groundcovers and woody ornamentals in landscape plantings as a soil surface spray. Individual trees and shrubs may be treated with a soil drench.

Pests Controlled		
Adelgids	Leafhoppers	
Aphids	Leafminers	
Armored scales (suppression)	Mealybugs .	
Black Vine Weevil Larvae	Pine Tip Moth Larvae	
Eucalyptus Longhorned Borers	Psyllids	
Flatheaded Borers	Royal Palm Bugs	
Japanese Beetles	Sawfly Larvae	
Lacebugs	Soft Scale (suppression)	
Elm Leaf Beetles	Thrips (suppression)	
Viburnum Leaf Beetles	White grub larvae	
	Whiteflies	

Application Instructions

Seedbed or planting beds: Apply as a broadcast treatment to the soil and incorporate into the soil by cultivation or irrigation before seeding, planting and transplanting.

Established plantings: Apply **IMI 1.47% Concentrate** to the root zone of the established plants and irrigate the treated areas before the insect activity is expected.

For best results, irrigate the treated area (0.5 inch) thoroughly after the application of IMI 1.47% Concentrate.

Hand-Operated Sprayers

Including backpack, compression, knapsack or tank type sprayers.

For soil applications to landscape plantings, mix 3.0 fl. oz. of **IMI 1.47% Concentrate** per one (1) gallon of water for treating approximately 333 sq. ft. Additional spray preparation rates are given in the table below.

Spray Volume Gallons of Water	Fluid Ounces (fl. oz.) of IMI 1.47% Concentrate	Tablespoons (tbs.) of product	Area to be treated sq. ft.
1 gallon	3.0 fl. oz.	6 tbs.	333 sq. ft.
2 gallons	6.0 fl. oz.	12 tbs.	666 sq. ft.
3 gallons	9.0 fl. oz.	18 tbs.	1,000 sq. ft.

 $^{1.0 \}text{ fl. oz.} = 2 \text{ tablespoons}$

Hose-End Sprayer Instructions

- 1. Measure the total area to be sprayed
- 2. Set the dial to 3 oz.
- 3. Add an adequate amount of product to the spray bottle to treat the total area, or add 9 fl. oz. of product for every 1,000 sq. ft.. For example, pour 18 fl. oz. of product into sprayer jar to treat an area of 2,000 sq. ft. Do not add water to jar.
- 4. Spray evenly over the measured area. Any unused product can be poured back into its original container.

Soil Drench to Individual Trees and Shrubs

IMI 1.47% Concentrate quickly dissolves in water allowing the insecticide to move through the soil into the root zone. Once in the roots, the insecticide moves up through the tree or shrub providing year-long insect protection. IMI 1.47% Concentrate will also provide protection to new

growth. Drench applications to individual trees will control aphids, borers, leafhoppers, lace bugs, mealybugs, scale insects, and other larvae as listed above.

NOTE: For complete protection, the insecticide must move throughout the tree or shrub. The time it takes to do this will depend on the size of the plant that is treated (one week to three months for very large trees). For this reason, soil drenches should occur 2-3 months before the expected pest infestation.

For best results, use this product as part of a preventative treatment program before insect damage occurs. Use one soil drench treatment per year during early spring to early fall.

IMI 1.47% Concentrate can be applied anytime except when the ground is saturated or frozen. These conditions will make movement of the product down into the root zone difficult. When applying this product during dry periods, generously water the tree or shrub the night before treatment.

Do not apply to soil that is frozen or waterlogged.

NOTE: Trees that are already heavily infested may not survive due to the existing pest damage and the resulting stress.

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

Application Instructions

TREES

Determining Amount of IMI 1.47% Concentrate to Use

Measure the circumference (distance in inches around the tree trunk) in inches at chest height or at 4.5 feet from the soil using a flexible tape. Or, measure the diameter of the tree trunk in inches at chest height or at 4.5 feet from the soil.

Mix 1 oz. of **IMI 1.47% Concentrate** per inch of circumference of the tree trunk to one (1) gallon of water. Refer to the mixing chart below for the amounts of IMI 1.47% Concentrate needed.

How to Apply

Apply the solution to the root zone as a band around the base of the tree. Apply one (1) gallon of solution in a circular band from the base of the tree outward for two (2) feet. For trees with trunk diameters more than 16 inches at chest height, apply two (2) gallons of solution in a circular band from the base of the tree outward for three to four (3-4) feet.

NOTE: To maximize the tree uptake, do not irrigate immediately after a soil drench application. Depending on the size and vigor of the tree, the uptake period may vary fro one week to three months for larger trees. Complete systemic protection will be achieved when the uptake and translocation from the roots to all plant parts (leaves) has occurred.

Tree Trunk Circumference (inches)	Tree Diameter (inches)	Amount of IMI 1.47% Concentrate (fl. oz.)	Volume of Water (gallons)	Band Width of Circular Area Around Base of Tree (outward feet)
8	2	8	1	2'
10	3	10	1	2'
15	5	15	1	2'
20	6	20	11	2'
25	8	25	1	2'
30	10	30	1	2'
35	11	35	. 1	3-4'

40	12	40	1	3-4'
45	14	45	1	3-4'
50	16	50	2	3-4'
55	18	55	2	3-4'

NOTE: The Directions for Use, or this chart for 1 quart containers may not describe the spray preparation beyond 32 fl. oz. per the *EPA Label Review Manual* Chapter 11.

SHRUBS

Determining Amount of IMI 1.47% Concentrate to Use

Measure the height of the shrub to the nearest foot. Round any inches down to the nearest foot if less than 6" and up to the nearest foot if greater than 6".

Mix 3 oz. of **IMI 1.47% Concentrate** per foot of shrub height to one (1) gallon of water. Refer to table below for additional mixing instructions.

How to Apply

Apply the solution to the root zone as a band around the base of the shrub. Apply one (1) gallon of solution in a circular band from the base of the shrub outward for one (1) feet. For shrubs with taller than 3 feet, apply one (1) gallon of solution in a circular band from the base of the shrub outward for two (2) feet.

NOTE: To maximize the shrub uptake, do not irrigate immediately after a soil drench application.

Shrub Height (feet)	Amount of IMI 1.47% Concentrate (fl. oz.)	Volume of Water (gallons)	Band Width of Circular Area Around Base of Shrub (outward feet)
2	6	1	1'
3	9	1	1'
4	12	1	2'
5	15	1	2'
6	18	1	2'
7	21	1	2'
8	24	1	2'

APPLE, PEAR, PEACH, PLUM, CHERRY AND PECAN TREES

For plants established in residential areas as ornamental plantings or as fruit/nuts for consumption.

Plants	Insect Pests Controlled	
Apple and Crabapple Pear, Common and Oriental	Aphids (except woolly apple aphid), Japanese beetles, leafhoppers (including glassy-winged sharpshooter), leafminers, mealybugs, and San Jose scale	
Peach, Plum and Cherry	Aphids, cherry fruit fly maggot, Japanese beetles, leafhoppers, plant bugs, San Jose scale and stink bugs	
Pecan	Yellow pecan aphid, black margined aphid, pecan leaf phylloxera, pecan spittlebug, pecan stem phylloxera	

Application Instructions

Timing of applications should coincide with vulnerable stages of the pests. The calendar schedules below are to be used as a guide to application timing but should not be considered a forecast or predictor for treating these insect pests. Consult your State Agricultural Extension Service agent for specific schedules and guidance for your local area. In addition, observe these guidelines for treating the following pests:

- Aphids: Make application when aphids first appear and before the leaves are rolled as a result of these pests.
- Leafhoppers: Make applications when leafhoppers first appear, during the nymph stage.
- Leafminers: Make two applications with intervals of 10 of more days. Make the first application soon after the petal fall is complete. A second application at the same dosage 10 days later should be applied to the early instar larvae.
- Mealybugs: Thorough and uniform coverage is necessary.
- San Jose Scale: Make application when crawlers are present. Ensure complete spray coverage of the branches, stems and leaves.
- Spittlebuq: Apply when spittle masses are present and as new generations develop.

For Apples and Pears: Apply full cover sprays after the petal fall is complete. Continue application until the target insects are controlled. Apply up to five (5) foliar applications per season and allow 10 or more days between insecticide applications. Allow seven (7) days between the final application and the apple or pear harvest.

Stage of Trees	Approximate Dates	Apple	Pear	
Petal fall	May 22			
1 st cover spray, 5-10 days after petal fall	June 1	X	X	
2 nd cover spray, 10-14 days later	June 15	X	X	
3 rd cover spray, 10-14 days later	June 29	X	· X	
4 th cover spray, 10-14 days later	July 13	X	X	
5 th cover spray, 10-14 days later	July 27	X	X	
Waiting period before harvest	·-	7 days	7 days	

For Peaches: Apply full cover sprays after the petal fall is complete. Continue application until the listed insects are controlled sufficiently. Use up to three (3) foliar applications per season. Allow at least 7 days between applications.

Stage of Trees	Approximate Dates	Peach	
Petal fall	May 25 – June 1		
1 st cover spray, 5-10 days after petal fall	June 1	X	
2 nd cover spray, 7-14 days later	June 8 – 14	X	
3rd cover spray, 7-14 days later	June 15 – 21	X	
Waiting period before harvest	-	0 days	

For Cherries and Plums: Apply full cover sprays after the petal fall is complete. Continue application until the target insects are controlled sufficiently. Apply up to five (5) foliar applications per season and allow 10 or more days between insecticide applications. Allow seven (7) days between the final application and the cherry or plum harvest.

Stage of Trees	Approximate Dates	Cherry	Plum
Petal fall	May 22		
1 st cover spray, 5-10 days after petal fall	June 1	X	X
2 nd cover spray, 10-14 days later	June 15	Х	X
3 rd cover spray, 10-14 days later	June 29	X	X
4th cover spray, 10-14 days later	July 13	X	Х
5 th cover spray, 10-14 days later	July 27	X	X
Waiting period before harvest	-	7 days	7 days

For Pecans: Apply full cover sprays after the petal fall is complete. Continue application until the listed insects are controlled sufficiently. Use up to three (3) foliar applications per season. Allow at least 7 days between applications.

Stage of Trees	Approximate Dates	Pecan
Petal fall	Late April	
1 st cover spray, 5-10 days after petal fall	May 1	X
2 nd cover spray, 10-14 days later	May 15	X
3 rd cover spray, 10-14 days later	May 30	٠X

How to Apply

Foliar applications with water should be made as a thorough cover spray to provide uniform distribution. Spray to wet all foliage (leaves, stems and branches). Target the undersides of the leaves and try to penetrate dense foliage with the spray droplets.

Ready-To-Spray Instructions:

- 1. Make sure knob control lever is in "OFF" position, then connect sprayer to garden hose.
- 2. When spraying low growing groundcovers and small shrubs, twist the sprayer hood to the "FAN" position. When spraying taller Trees, Shrubs and Ornamentals, twist the sprayer hood to the "STREAM" position for extended reach and more uniform coverage.
- 3. Turn water on at faucet. To begin spraying, turn [rotate] knob control lever to "ON" position. The product mixes automatically with the water as you spray.
- 4. To stop spraying, turn [rotate] knob control lever to the "OFF" position. Turn off water at the faucet. To relieve pressure, turn [rotate] knob control lever to the "ON" position and point the sprayer away from any desirable plants before disconnecting the spray nozzle from the garden hose.

Hose-End Sprayer Instructions

- 1. Set the dial to 1 ½ teaspoons (tsp.). Keep the dial set to this setting while spraying.
- 2. Add an adequate amount of product to the spray bottle to treat the infested trees. Do not add water to jar.
- 3. Spray to wet all foliage and direct the spray droplets for an even distribution on the target plants. Any unused product can be poured back into its original container.

Spray volume will vary with the size of the trees and thorough coverage is important. Small trees (less then 15 feet in height) will require approximately 2 gallons of diluted spray per tree. Larger trees (25 feet in height) will require approximately 8 gallons of diluted spray per tree.

Dilutions and Time Chart - The estimated amount of diluted spray and the time required to

spray one tree with the dial setting of 1 1.2 teaspoons (tsp.)

Tree Height (feet)	Spray Volume per Infested Tree (gallons)	Estimated Time to Spray One Tree (minutes)
15	2	1
20	5	2 1/2
25	8	4
30	15	7 ½
35	20	10

Soil Drench to Apple, Pear, Peach, Plum, Cheery and Pecan Trees

IMI 1.47% Concentrate quickly dissolves in water allowing the insecticide to move through the soil into the root zone. Once in the roots, the insecticide moves up through the tree or shrub providing year-long insect protection. IMI 1.47% Concentrate will also provide protection to new growth. Drench applications to individual trees will control aphids, borers, leafhoppers, lace bugs, mealybugs, scale insects, and other larvae as listed above.

NOTE: For complete protection, the insecticide must move throughout the tree or shrub. The time it takes to do this will depend on the size of the plant that is treated (one week to three

months for very large trees). For this reason, soil drenches should occur 2-3 months before the expected pest infestation.

For best results, use this product as part of a preventative treatment program before insect damage occurs. Use one soil drench treatment per year during early spring to early fall.

IMI 1.47% Concentrate can be applied anytime except when the ground is saturated or frozen. These conditions will make movement of the product down into the root zone difficult. When applying this product during dry periods, generously water the tree or shrub the night before treatment.

Do not apply to soil that is frozen or waterlogged.

NOTE: Trees that are already heavily infested may not survive due to the existing pest damage and the resulting stress.

Determining Amount of IMI 1.47% Concentrate to Use

Measure the circumference (distance in inches around the tree trunk) in inches at chest height or at 4.5 feet from the soil using a flexible tape. Or, measure the diameter of the tree trunk in inches at chest height or at 4.5 feet from the soil.

Mix 1 oz. of **IMI 1.47% Concentrate** per inch of circumference of the tree trunk to one (1) gallon of water. Refer to the mixing chart below for the amounts of IMI 1.47% Concentrate needed.

How to Apply

Apply the solution to the root zone as a band around the base of the tree. Apply one (1) gallon of solution in a circular band from the base of the tree outward for two (2) feet. For trees with trunk diameters more than 16 inches at chest height, apply two (2) gallons of solution in a circular band from the base of the tree outward fro three to four (3-4) feet.

NOTE: To maximize the tree uptake, do not irrigate immediately after a soil drench application. Depending on the size and vigor of the tree, the uptake may vary for one week to three months for larger trees.

Tree Trunk Circumference (inches)	Tree Diameter (inches)	Amount of IMI 1.47% Concentrate (fl. oz.)	Volume of Water (gallons)	Band Width of Circular Area Around Base of Tree (outward feet)
8	2 .	8	1	2'
10	3	10	1	2'
15	5	15	1	2'
20	6	20	1	2'
25	8	25	1	2'
30	10	30	1	2'
35	11	35	1	3-4'
40	12	40	1	3-4'
45	14	45	1	3-4'
50	16	50	2	3-4'
55	. 18	55	2	3-4'

NOTE: The Directions for Use, or this chart for 1 quart containers may not describe the spray preparation beyond 32 fl. oz. per the *EPA Label Review Manual* Chapter 11.

STORAGE AND DISPOSAL

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

Disposal: Do not reuse empty container. Rinse the empty product container thoroughly and disperse the rinse water on lawn as part of the application. Place container in trash. **Important:** It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please call your local solid waste agency. Never place unused product down any indoor or outdoor drain.

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 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

Optional marketing statements in brackets []

[For Use on Lawns]

[Kills White Grubs, Mole Crickets and European Crane Fly Larvae]

[One application kills white grubs; mole crickets and European Crane Fly Larvae all season long]

[When applied early, IMI 1.47% Concentrate kills grubs, mole crickets and European crane fly

before they hatch and damage lawns]

[Ready-to-Spray..No Mixing, No Measuring]

[Treats more than 5,000 sq ft (32 oz size)]

[Treats up to 5,333 sq. ft.]

[Season Long Control of White Grubs]

[Kills Grubs all season]

Early Application stops grubs before they start]

[One easy application per year]

[For Use on Trees & Shrubs including listed Fruit and Nut Trees]

[For Use on Apple, Pear, Peach, Plum, Cherry and Pecan Trees]

[Protects Against Insects for Up to 12 months]

[Kills Adelgids, Aphids, Bronze Birch Borers, Leafminers, Scale and other listed pests]

[Kills insects & prevents new infestations]

[Apply to [trees] [and] [shrubs] once a year or when insects appear]

[Protection cannot be washed off by rain or water.]

[Just mix in water and pour around tree or shrub]

[Treats 32" around Trees and 5 - 2 ft. tall Shrubs (32 fl. oz.)])

[Mix & Pour apply at the tree base]

[Moves up through the tree or shrub providing year long insect protection]

[Moves through the soil into the root zone]

[Can be applied as a foliar spray and/or soil drench]

[Systemic insect protection for the entire plant]

[No Mixing, No Measuring – just connect to the hose and begin spraying.]

[Kills [controls] Emerald Ash Borer and Bronze Birch Borer]

[Kills [Controls] Borers, including Asian Longhorned, Emerald Ash and Bronze Birch Borers.]

Protects Lawns, Flowers, Shrubs, Ornamentals, Shrubs and Trees (including listed Fruit & Nut Trees.)

[Orchard Spray & Drench controls insects on Apple, Pear, Peach, Plum, Cherry and Pecan Trees.]

[Apply up to day of harvest on Peaches and Pecans.]

[Apply up to 7 days before harvest on Apples, Pears, Cherries, and Plums.]