

8/24/2007



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Joe Blake  
Director, Regulatory Affairs  
Control Solutions, Inc.  
5903 Genoa-Red Bluff  
Pasadena, TX 77507-1041

AUG 24 2007

SUBJECT: Application for Pesticide Notification – Correct Typo in Rate Chart  
IMI 0.22% G Plant Granules  
EPA Reg. No. 53883-217  
Application Dated July 8, 2007

Dear Mr. Blake:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls 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 Terri Stowe of my staff at 703-305-6117.

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

2/7

**CSI**  
**CONTROL**  
**SOLUTIONS**  
incorporated

July 9, 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. 53883-217

**NOTIFICATION**

**AUG 24 2007**

Dear Sir or Madam:

Enclosed is a Notification to correct typographical error in rate chart per PR Notice 98-10. Please see highlighted area in label on page 3.

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



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 53883 - 217	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMI 0.22% G Plant 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 _____	<b>NOTIFICATION</b>  <b>AUG 24 2007</b>
<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 to correct typographical error in rate chart 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 <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
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 (Stamped)
2. Signature 		3. Title Director, Regulatory Affairs	
4. Typed Name Joe Blake		5. Date 07-08-07	

(Front Panel)

# IMI 0.22G

## Plant Granules

- Protects against damaging insects for up to [8 weeks][2 months]
- Defends houseplants against insects
- Internal insect protection won't wash off with rain or water
- Protects plants from damage by: Aphids, Whiteflies, Mealybugs, Scale, and other listed insects
- Encourages strong roots and robust blooms
- Easy-To-Use Granules
- For indoor and outdoor plants
- Protects plants against insect infestations
- Use in potted plants indoors and outdoors
- For use outdoors on flower beds, roses and shrubs

### FOR RESIDENTIAL USE ONLY

- Kills birch leaf miner
- Highly effective, Lasting protection
- No spraying...no mess
- Promotes strong roots and beautiful blooms
- For use in potted plants
- Long lasting, effective protection
- Protects plants from damage by Aphids, Scale, Whiteflies and other listed insects
- Even new growth is protected against insects for up to 8 weeks.
- For containerized plants
- Protects plants from damaging insects for up to 2 months

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### ACTIVE INGREDIENT:

Imidacloprid .....0.22 %

OTHER INGREDIENTS: .....99.78 %

**STOP - Read This Entire Label Before Use**  
**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

See Back Panel [Booklet] for Additional Ingredients and Precautionary Statements

Not for sale, sale into, distribution and or use in Nassau, Suffolk, Kings, and Queens counties of New York.

EPA Reg. No. 53883-217

EPA Est. No. 53883-TX-002

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. Washing hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco will reduce exposure.

<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 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 water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 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>
<b>NOTE:</b> When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's, bring product label to show medical personnel. You may also contact SafetyCall® International (866) 897-8050 for emergency medical treatment information.	

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates.

Do not apply directly to water.

Do not contaminate water when cleaning equipment or disposing of equipment washwater.

**DIRECTIONS FOR USE**

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

**USE RESTRICTIONS**

- Do not apply near fish pools, ponds, lakes or streams
- Do not use in vegetable gardens.
- Food utensils such as teaspoons or measuring cups should not be used for food purposes after use with insecticides.

**GENERAL INFORMATION**

IMI 0.22 G Plant Granules is for use on roses, flowers, shrubs and containerized plants (except edible plants) to kill insect pests listed in the table below. IMI 0.22 G Plant Granules is absorbed by roots and moves through the entire plant. New growth is protected against insects for up to 8 weeks.

## INSECTS CONTROLLED

Adelgids  
Aphids  
Armored Scales (suppression)  
Fungus Gnat Larvae  
Japanese Beetle Adults  
Lace bugs  
Leaf Beetles (including Elm Leaf, Viburnum Leaf,  
and Lily Leaf Beetles)  
Leafhoppers (including Glassy-winged  
Sharpshooter)  
Leafminers (including Birch and Boxwood  
Leafminers)

Mealybugs  
Pine Tip Moth Larvae  
Plant bugs  
Psyllids  
Root Weevil Larvae (including black vine weevils)  
Sawfly Larvae  
Soft Scales (Including lobate lac scales)  
Thrips  
Whiteflies  
White Grub larvae (such as Japanese Beetles,  
Chafers, European Chafer, Oriental Beetle, Asiatic  
Garden Beetle)

## APPLICATION TIMING

IMI 0.22G Plant Granules may be applied at planting. When using on established plants, apply before pest problems occur or immediately when first seen. Applications should be made every 8 weeks during the growing season.

## APPLICATION INSTRUCTIONS

For best results, apply IMI 0.22 G Plant Granules evenly, cultivate lightly, and water thoroughly. For containerized plants, apply the appropriate amount of granules evenly to the top of the soil. Mix the granules thoroughly into the top layer of the soil making sure not to damage the upper roots. Water in thoroughly. To help assure that the roots can absorb the insecticide, do not water too heavily for the first 10 days. Work granules into top 1 to 2 inches of soil. For flower beds, sprinkle granules evenly over the bed.

## APPLICATION RATES

PLANTS	AMOUNT IMI 0.22 G PLANT GRANULES NEEDED*	(g/AI)
Roses (2 lbs. treats up to 16 medium-size roses)	¼ cup per plant	(0.12)
Flowers	¼ cup per 50 sq. ft. (5" x 10" bed area)	(0.12)
Shrubs	½ cup per foot of plant height	(.24)

CONTAINERIZED PLANTS/SIZE 8 oz. treats up to six-6 inch potted plants	AMOUNT OF IMI 0.22 G PLANT GRANULES NEEDED*	(g/AI)
1 gallon	2.5 tablespoons	(0.77)
2 gallon	1/3 cup	(0.193)
3 gallon	1/2 cup	(0.23)
5 gallon	2/3 cup	(0.345)
10 gallon	1 1/3 cup	(0.69)
15 gallon	2 cups	(1.04)
or	or	or
4 inch	2.5 teaspoons	(0.025)
5 inch	1.5 tablespoons	(0.05)
6 inch	2.5 tablespoons	(0.075)
8 inch	1/5 cup	(0.1)
10 inch	1/4 cup	(0.15)
12 inch	1/3 cup	(0.2)
16 inch	1/2 cup	(0.3)

\*(Values will vary with carrier density)

**STORAGE AND DISPOSAL**

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

**Disposal: If Empty:** Do not reuse empty container. Place in trash.

**If Partly Filled:** 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 for disposal instructions. 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 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.

**AN ADDITIONAL EQUIVALENT CHART FOR DRY MEASURE IS LISTED BELOW\***

**DRY MEASURE CHART**

3 teaspoons	1 Tablespoon	½ ounce	
2 Tablespoons	1/8 cup	1 ounce	
4 Tablespoons	¼ cup	2 ounces	
5 1/3 Tablespoons	1/3 cup	2.6 ounces	
8 Tablespoons	½ cup	4 ounces	
12 Tablespoons	¾ cup	6 ounces	
32 Tablespoons	2 cups	16 ounces	1 pound
64 Tablespoons	4 cups	32 ounces	2 pounds

\*Please not  
Dry Measure differs from Liquid Measure

Food utensils such as teaspoons or measuring cups should not be used for food purposes after use with insecticides.

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