

53883-217

09/13/2013

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

SEP 13 2013

Ms. Shannon Cooley
Control Solutions, Inc.
5903 Genoa red Bluff
Pasadena, TX 77507-1041

Subject: Notification to Correction Error in the Flower Application From Inches to Feet

Dear Ms. Cooley:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated August 22, 2013:

EPA Registration 53883-217

IMI 0.22G Plant Granules

Registration Division (RD) has conducted a review of this request of applicability under PRN 98-10 and finds that the label changes(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Dani Daniel".

Dani Daniel
Registration Division (7504P)
Insecticide/Rodenticide Branch

NOTIFICATION

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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 - 217 | 2. EPA Product Manager Venus Eagle | 3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) IMI 0.22G Plant Granules | PM# 1 | |
| 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 to correct a typographical error in the label (page 3).

Section - III

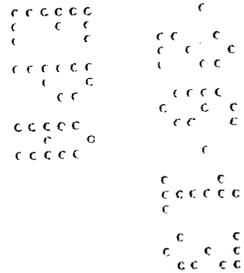
| | | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|-----------------------------------------|---------------------------------------------------------------------------------|---------------------------------------------|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Metal | <input checked="" type="checkbox"/> Plastic |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. No. per container | If "Yes" Package wgt. No. per container | <input checked="" type="checkbox"/> Glass | <input checked="" type="checkbox"/> Paper |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container | | 4. Size(s) Retail Container 1 pt - 50 lb | | 5. Location of Label Directions <input checked="" type="checkbox"/> on label | |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" 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 Shannon Cooley | Title Regulatory Affairs Specialist | Telephone No. (Include Area Code) 800-242-5562 |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | 6. Date Application Received (Stamped) |
| 2. Signature <i>Shannon Cooley</i> | 3. Title Regulatory Affairs Specialist | |
| 4. Typed Name Shannon Cooley | 5. Date 8-22-13 | |



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



August 22, 2013

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Re: Notification for typographical error
EPA Reg. No. 53883-217 / IMI 0.22G Plant Granules

Dear Sir or Madam:

Control Solutions, Inc. (CSI) is requesting a notification to correct an error in the flower application on page 3. The bed area was in inches and should have been in feet.

"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 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

The following documents are enclosed in support of this application

- 8570-1
- Label - annotated (in track changes) – 1 copy
- Label – clean version – 1 copy

Please contact me directly should you need any additional information,

Sincerely,

Shannon Cooley

Shannon Cooley
Regulatory Affairs

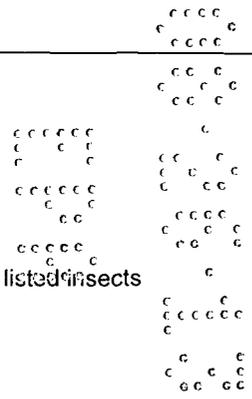
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(Front Panel) **NOTIFICATION**
SEP 13 2013

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

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.

| FIRST AID | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IF SWALLOWED: | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything to an unconscious person. |
| IF ON SKIN OR CLOTHING: | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice. |
| IF IN EYES | <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice. |
| <p>NOTE: 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.</p> | |

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

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

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.

Container Disposal:

If Empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, 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 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 | 1/2 ounce | |
| 2 Tablespoons | 1/8 cup | 1 ounce | |
| 4 Tablespoons | 1/4 cup | 2 ounces | |
| 5 1/3 Tablespoons | 1/3 cup | 2.6 ounces | |
| 8 Tablespoons | 1/2 cup | 4 ounces | |
| 12 Tablespoons | 3/4 cup | 6 ounces | |
| 32 Tablespoons | 2 cups | 16 ounces | 1 pound |
| 64 Tablespoons | 4 cups | 32 ounces | 2 pounds |

*Please note

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