



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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Ms. Amy Warren Regulatory Affairs Specialist Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041

SEP 2 5 2008

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4 Email label on September 24, 2008

Dear Ms. Warren:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated August 18, 2008 email label on September 24, 2008 for:

EPA Registration 53883-227

IMI 1% G Insecticide

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

Linda Arrington

Notifications & Minor Formulations Team Leader Registration Division (7505P)

Office of Pesticide Programs

Please read instructions on reverse before __mpleting form.

Form Approved. OMB No. 2070-0060, Approvel expires 2-28-95

	Registration
	Amendment
1	Other

ŞEPA	Environmenta					Amend		OFF Identifier Number	
	Washi	ington, DC 20	460		1	Other			
		Application	on for Pestic	ide - Sec	tion				
1. Company/Product Number 53883 - 227				Product Mar ge LaRocca			3. Pr	oposed Classification	
4. Company/Product (Name) IMI 1% G Insecticide			PM#	13				Nestricted	
5. Name and Address of App Control Solutions, Inc 5903 Genoa-Red Blut Pasadena, TX 77507 Check if this	ff	ode)	(b)(i), to: EPA	2012 000		NOTIFI	ical in co	FIFRA Section 3(c)(3) imposition and labeling	
			Section -	11	1 10				
Amendment - Explain Resubmission in resp Notification - Explain	onse to Agency letter	dated		Final printe Agency let "Me Too" Other - Exp	ter dat Applica	ition.	e to		
Explanation: Use addition Notification of label change p regulations at 40 CFR §§ 156 Formula for this product. I ur amended label is not consiste FIFRA and I may be subject to	er PR Notice 2007-4. 5.10, 156.140, 156.144, derstand that it is a vicent with the requiremen	This notification, 156.146, and plation of 18 U.S	n is consistent with the 156.156. No other S.C. Sec. 1001 to w § 156.10, 156.140, ander sections 12 and	the guidance ir changes have illfully make ar 156.144, 156. d 14 of FIFRA	been r ny false 146, ar	nade to the la	abeling or to EPA. I fu	he Confidential Statement of rther understand that if the	
			Section -	III					
1. Material This Product Will Child-Resistant Packaging Yes No	Be Packaged In: Unit Packaging Yes No		Water Soluble Yes ✓ No	Packaging		2. Type of	Container Metal Plastic Glass		
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	es" No. per ✓ Paper			Specify)		
3. Location of Net Contents ☐ C	nformation ontainer	4. Size(s) Re	tail Container 1 lb to 100 lbs		5. Lo	oation of Lat	oel Direction	ons	
6. Manner in Which Label is	Affixed to Product	Lithog Paper Stenc	graph glued iled	Othe	or				
			Section -	V					
1. Contact Point (Complete	items directly below t	for identification	on of individual to	be contacted,	if nec	essary, to pr	ocess this	application.)	
Name Amy Warren			Title Regulatory Affairs Specialist			Telephone No. (Include Area Code) 800-242-5562			
l certify that the stater I acknowledge that an both under applicable l	y knowlingly false or	Certifica this form and misleading sta	all attachments th	nereto are tru inishable by f	e, accu îne or i	rate and co	mplete.	6. Date Application Received (Stamped)	
2. Signature	MON		3. Title Regulatory Affairs	Specialist				((((
4. Typed Name Amy Warren			5. Date 8-18-08					(((



August 18, 2008

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

Re: Notification per (PR) Notice 2007-4, Labeling Revisions required by the Final Rule "Pesticide Management and Disposal" IMI 1% G Insecticide (EPA Reg. No. 53883-227)

Dear Sir or Madam:

Enclosed is a Notification for (PR) 2007-4; See highlighted text on attached labeling.

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, 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.

If you have any questions or need additional information, please feel free to contact me.

Sincerely,

Amy Warren

Regulatory Affairs Specialist Control Solutions, Inc.

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IMI 1% G

A systemic insecticide for use on ornamental plants in greenhouses, nurseries, and interior plantscapes.

ACTIVE INGREDIENT:

Imidacloprid: I-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine......1.0%

OTHER INGREDIENTS:99.0%

TOTAL:......100.0%

EPA Reg. No. 53883-227 EPA Est. No. 53883-TX-002

Net Contents:

KEEP OUT OF REACH OF CHILDREN CAUTION

See inside label booklet for additional precautionary statements.

	FIRST AID
If in eyes:	 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.
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 so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on skin or clothing:	 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall[®] International (866) 897-8050 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

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

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Keep children or pets off treated area until spray is dry.

Personal Protective Equipment (PPE)

Applicators and other handlers 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.
- Shoes plus socks

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

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(4)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

User should:

- · Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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.

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 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.

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

APPLICATION INFORMATION

IMI 1% G Insecticide will control insects on ornamental plants grown in nurseries and greenhouses. IMI 1% G Insecticide is a systemic insecticide that is translocated upwards within the plant. For best results, IMI 1% G Insecticide must be applied where the roots of the target plants can absorb the active ingredient. After application, irrigate moderately but thoroughly, being sure to avoid leaching and runoff from the container for at least three irrigations or 10 days whichever is longer.

Use Precautions:

- Do NOT graze treated areas or use clippings from treated areas for feed or forage.
- Do NOT apply to soils which are waterlogged or saturated. This condition will not allow penetration of water into the root zone of the plants.
- Do NOT over-irrigate or allow excessive runoff to occur following an application of IMI 1% G Insecticide.
- Do NOT apply more than 40 lbs. of IMI 1% G Insecticide per acre per year.
- On plants with a production cycle of less than one year, application is not to exceed a frequency of more than once each 16 weeks for a particular plant. On stock plants and woody crops with a production cycle of greater than one year, application may not exceed once a year.

Food Crops: 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 tolerance for the active ingredient have been established, a 12-month plant-back interval should be observed.

Insect Resistance: After repeated use of a particular insecticide, some insects may develop a resistance. It is important that the use of this product conforms to resistance management practices established for the use area. Consult your Cooperative Extension Service for resistance management strategies and recommended pest management practices for your area.

Do not make a foliar application of any chloronicotinyl insecticide following IMI 1% G Insecticide soil application to the same crop.

Woody Perennials: Protection in woody perennials is slower than in herbaceous species and a delay of 2 or more weeks should be expected, with longer delays for larger plants. Because of this, applications to woody perennials should be made well in advance of expected insect activity.

Incorporation: Incorporation of IMI 1% G Insecticide can be accomplished by cultivation, irrigation, rainfall, mechanical placement, or by using mechanical soil or media mixing equipment.

Bark Media: When treating bark media with 30-50% or more bark content, the period of protection with IMI 1% G Insecticide will be shortened.

APPLICATION TO GRASSY AREAS IN NURSERIES

RESTRICTION: IMI 1% G Insecticide may NOT be used on commercial sod farms.

IMI 1% G Insecticide will control soil-inhabiting pests in grassy areas in or around nurseries such as under or around field or container grown plants, on roadways or other grassy areas. The need for an application can be based on historical monitoring of the site, previous records or experiences, current season adult trappings or other methods. Applications may be made preceding the egg laying activity of the target pests and high levels of control may be achieved when applications are made proceeding or during the egg laying period. For best results, make applications prior to egg hatch of the target pests, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

PESTS CO	NTROLLED
Annual bluegrass weevil (<i>Hyperodes</i> spp.) Billbugs (<i>Spherophorus</i> spp.) Green June beetle (<i>Cotinis nitida</i>) May or June beetle (<i>Phyllophaga</i> spp.) Oriental beetle (<i>Anomala orientalis</i>) Northern and Southern masked chafers (<i>Cyclocephala borealis, C. immaculate, and/or C. lurida</i>	Asiatic garden beetle (Maladera castanea) European chafer (Rhizotroqus majalis) Japanese beetle (Popillia japonica) Mole crickets (Scapteriscus spp.) Black turfgrass ataenius (Ataenius spretulus and Aphodius spp.)
PESTS SU	PPRESSED
Cutworms	Hairy chinch bugs

Grassy Area Use Precautions

- Applications must NOT exceed a total of 40 lbs. (0.4 lb. of active ingredient) per acre per year.
- DO NOT make applications when grassy areas are waterlogged or the soil is saturated with water because adequate distribution of the active ingredient cannot be achieved when these conditions exist.
- The treated grassy area must be in such a condition that the rainfall or irrigation will penetrate vertically in the soil profile.

APPLICATION TO ORNAMENTALS GROWN IN FLATS, BENCHES, BEDS AND CONTAINERS

IMI 1% G Insecticide will suppress or control the following insect pests when applied to ornamentals grown in flats, benches, beds and containers in greenhouses and nurseries.

Adelgids	Aphids
Armored scale (suppression)	Fungus gnats (larvae only) ¹
Japanese beetles (adults)	Lacebugs
Leafminers	Mealybugs
Psyllids	Root weevil
Soft scale	Thrips (suppression) ³
Whiteflies	Leaf beetles (including Elm and Viburnam leaf
Leafhoppers (including glassy-winged	beetles)
sharpshooter)	Complex (such as Black vine weevil, Apopka
	weevil, Citrus Root weevil ²)

¹ Fungus gnat larvae in the soil will be controlled by incorporation. IMI 1% G Insecticide will not control adult Fungus gnat. Other foliar insect control is achieved by the uptake of IMI 1% G Insecticide from a healthy root system translocating the active ingredient up into the plant.

² Citrus Root weevil: For use on non-bearing nursery stock.

³ Thrips suppression on foliage only. Thrips in buds and flowers will not be suppressed.

¹ level teaspoon of IMI 1% G Insecticide = 4.1 grams

³ teaspoons = 1 tablespoons

HERBACEOUS AND WOODY PERENNIAL SPECIES

	Herbaceous S	pecies (one or two	plants per pot)		
	Application Rates				
	Bulk Ap	olication	Topical Application		
Container Size (inches)	Pots/cu. yd. of mix	Bulk Rate lbs./cu. yard	Topical Rate (level teaspoonful)	Grams/pot	
2.0 to 3.0	4500 to 3200	7.0 to 3.5	1/8 to 1/4	0.5 to 1.0	
3.5 to 5.0	1600 to 1300	3.9 to 3.0	1/4 to 1/3	1.0 to 1.4	
5.5 to 7.0	900 to 400	1.8 to 1.2	1/3 to 1/2	1.4 to 2.0	
8.0 to 10.0	200 to 160	1.0 to 0.8	1/2 to 2/3	2.0 to 2.7	
11.0 to 12.0	80 to 60	0.8 to 0.5	2/3 to 1	2.7 to 4.1	
		dy Perennial Spec ecies (three or mo			
2.0 to 3.0	4500 to 3200	9.0 to 7.0	1/4 to 1/3	1 to 1.3	
3.5 to 5.0	1600 to 1300	6.0 to 4.0	1/3 to 1/2	1.3 to 2.0	
5.5 to 7.0	900 to 400	2.5 to 2.0	1/2 to 2/3	2.0 to 2.7	
8.0 to 10.0	200 to 160	1.5 to 1.0	2/3 to 1	2.7 to 4.1	
11.0 to 12.0	80 to 60	1.0 to 0.8	up to 1 1/2	4.1 to 6.1	

Bulk Rate Application: Mix the required amount of IMI 1% G Insecticide per cubic yard of medium. Mix thoroughly before filling pots and transplanting.

Topical Application: May be made at transplanting, repotting or on established containerized plants. Irrigate moderately after application into the root zone. Do not allow significant leaching and runout for at least 3 irrigations or 10 days whichever is longer.

CONTAINERIZED PLANTS

	Application Rate					
	Bulk App	lication	Topical Ap	plication		
Container Size (Gallons)	Pots/cu. yd. of mix	Bulk Rate	Topical Rate (level teaspoonful)	Grams/pot		
1	260 to 230	5.0 to 2.5	1 1/4 to 2 1/2	5 to 10		
2	125 to 100	4.4 to 2.2	2 1/2 to 5.0	10 to 20		
3	70 to 60	3.3 to 1.7	3 2/3 to 7 1/3	15 to 30		
5	50 to 30	2.0 to 1.0	4 1/2 to 9.0	18.5 to 37		

For optimum control make applications prior to egg hatch of the target pest. Irrigate moderately after application to move the active ingredient into the root zone.

ORNAMENTAL PLANTS GROWN IN FLATS, BENCHES OR BEDS

Application Rate	Application Instructions
15 oz. per 1000 sq. ft.	Apply as a broadcast treatment and incorporate into the soil or media before planting. On established plants, irrigate moderately after
	application to move the active ingredient into the root zone. Minimize leaching and runout for at least 3 irrigations or 10 days, whichever is
	longer.

FOR CONTROL OF WHITE GRUB LARVAE* ON ORNAMENTALS IN FIELD AND FOREST NURSERIES

Application Rate	Application Instruction
Use 45 oz. per 1000 sq. ft. of row or 3000 sq. ft.	Vegetation in the area to be treated should be mowed to a height of 3 inches or less prior to application. Mowing to the lowest possible height will ensure greater consistency of control.
	For grub control in areas of turf, apply as a broadcast application using 45 or per 3000 sq. ft.
	Apply May through July. For optimum control, treatment should be followed by rainfall or irrigation. Apply as a uniform band on either side of row using a band six (6) inches wider than the actual root ball diameter to be dug. Do not allow bands in adjacent rows to overlap.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: 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, preferable in a locked storage area.

PESTICIDE DISPOSAL: Wastes resulting from the use of the product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL:

Paper Bags: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Plastic Container: For Containers equal to or less than 50 Pounds: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available.

For Containers greater than 50 Pounds: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling if available.

For Bulk containers: (Refillable Container) Refill this container with pesticides only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the re-filler. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this procedure two more times.

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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

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