

S 3883-227

11/17/2008

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



NOV 17 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Amy Warren
Control Solutions
5903 Genoa Red Bluff
Pasadena, TX 77507

Dear Ms. Warren

Subject: EPA initiated action to amend the final submitted label for correction of errors in directions for use section
· IMI 1% G Insecticide
· EPA Registration No. 53883-227

The labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide, as amended is acceptable. Thank you for the timely revisions as requested.

As noted in the registration letter dated August 24, 2007, submission of the one year storage stability study (830.6317) and corrosion characteristic study (830.6320) for the proposed product is still outstanding and due to the Agency on or before February 24, 2009.

Submit two copies of your final printed label before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA 6(e).

A stamped copy of the labeling is enclosed for your records. If you have any questions regarding this label, please contact Autumn Metzger at (703) 305-5314.

Sincerely,

A handwritten signature in black ink that reads "Venus Eagle".

Venus Eagle
Product Manager 01
Insecticide-Rodenticide Branch
Registration Division (7505P)

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ACCEPTED
With COMMENTS
In EPA Letter Dated:
NOV 17 2008

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

53883-227

IMI 1% G Insecticide

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: (lbs)

KEEP OUT OF REACH OF CHILDREN CAUTION

See inside label booklet for additional precautionary statements.

FIRST AID	
If in eyes:	<ul style="list-style-type: none"> • 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:	<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 so by the poison control center or doctor. • Do not give anything by mouth 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.
HOT LINE NUMBER	
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 CONTROLLED	
Annual bluegrass weevil (<i>Hyperodes</i> spp.)	Asiatic garden beetle (<i>Maladera castanea</i>)
Billbugs (<i>Spherophorus</i> spp.)	European chafer (<i>Rhizotroqus majalis</i>)
Green June beetle (<i>Cotinis nitida</i>)	Japanese beetle (<i>Popillia japonica</i>)
May or June beetle (<i>Phyllophaga</i> spp.)	Mole crickets (<i>Scapteriscus</i> spp.)
Oriental beetle (<i>Anomala orientalis</i>)	Black turfgrass ataenius (<i>Ataenius spretulus</i> and
Northern and Southern masked chafers (<i>Cyclocephala borealis</i> , <i>C. immaculate</i> , and/or <i>C. lurida</i>)	<i>Aphodius</i> spp.)
PESTS SUPPRESSED	
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 Armored scale (suppression) Japanese beetles (adults) Leafminers Psyllids Soft scale Whiteflies Leafhoppers (including glassy-winged sharpshooter)	Aphids Fungus gnats (larvae only) ¹ Lacebugs Mealybugs Root weevil Thrips (suppression) ³ Leaf beetles (including Elm and Viburnum leaf beetles) Complex (such as Black vine weevil, Apopka weevil, Citrus Root weevil ²)
<p>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.</p> <p>² Citrus Root weevil: For use on non-bearing nursery stock.</p> <p>³ Thrips suppression on foliage only. Thrips in buds and flowers will not be suppressed.</p>	

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

3 teaspoons = 1 tablespoons

HERBACEOUS AND WOODY PERENNIAL SPECIES

Herbaceous Species (one or two plants per pot)				
Container Size (inches)	Application Rates			
	Bulk Application		Topical Application	
	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
Woody Perennial Species or Herbaceous Species (three or more plants per pot)				
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
<p>Bulk Rate Application: Mix the required amount of IMI 1% G Insecticide per cubic yard of medium. Mix thoroughly before filling pots and transplanting.</p> <p>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 runoff for at least 3 irrigations or 10 days whichever is longer.</p>				

CONTAINERIZED PLANTS

Container Size (Gallons)	Application Rate			
	Bulk Application		Topical Application	
	Pots/cu. yd. of mix	Bulk Rate lbs./cu. yard	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 runoff for at least 3 irrigations or 10 days, whichever is longer.

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**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 oz 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.

* White grub larvae include Japanese beetle, Masked chafer, Oriental beetle, and Asiatic garden beetle.

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: 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.

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Control Solutions, Inc.
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