

53883-229

11/9/2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Carroll Draper
Registration Specialist
Control Solutions, Incorporated
5903 Genoa-Red Bluff
Pasadena, TX 7507-1041

NOV 9 2007

RE: Notification of Alternate Brand Name
EPA Registration Number: 53883-229
Date of Submission: October 10, 2007

Dear Ms. Draper:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated October 10, 2007 for the product IMI 2lb Insecticide. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall 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 Joyce Edwards of my staff at 703-308-5479.

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

SIG

2017



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 - 229	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMI 2lb. Insecticide	PM# 01	
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.

NOTIFICATION

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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification for Alternate Brand Name. This product will also be marketed as Dominion 2L Termiticide/Insecticide. 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
* 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 Carroll Draper	Title Registration 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 	3. Title Registration Specialist	
4. Typed Name Carroll Draper	5. Date 10-10-07	

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DOMINION 2L

NOTIFICATION

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Termiticide/Insecticide

FOLIAR AND SYSTEMIC INSECT CONTROL

FOR USE ON TURFGRASS (INCLUDING SOD FARMS, LANDSCAPE ORNAMENTALS, FRUIT AND NUT TREES AND INTERIOR PLANTSCAPES.

PREVENTS AND CONTROLS SUBTERRANEAN TERMITES, DRYWOOD TERMITES, DAMPWOOD TERMITES, CARPENTER ANTS, AND OTHER WOOD-INFESTING INSECTS

For use by professional personnel licensed or registered by the state to apply termiticide, turf maintenance, nursery/greenhouse, and/or landscaping/ornamental products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.]

ACTIVE INGREDIENT:

Imidacloprid: 1-1(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine 21.4%

INERT INGREDIENTS: 78.6%

Total: 100.0%

Contains 2 pounds of imidacloprid per gallon.

Shake well before using.

EPA Reg. No. 53883-229

EPA Est. No. 53883-TX-002

Keep out of reach of children

CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

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 <i>if</i> able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing • Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in Eyes	<ul style="list-style-type: none"> • Hold eyelids 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.

HOT LINE NUMBER

Have the product container or label with you when calling a poison central 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 patient symptomatically.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled, or absorbed through skin. Avoid contact with skin, eyes, or clothing. Avoid breathing.

spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children or pets away from treated area until dry.

Personal Protective Equipment (PPE)

WPS and Termiticide Uses:

Applicators and other handlers (mixers and loaders) who handle this product for uses covered by the Worker Protection Standard (40 CFR part 170) – such as sod farms; or who are using this product as a termiticide, 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. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.
- Shoes plus socks

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

When used as a termiticide, once the product is diluted as directed on the label, shirt, pants, shoes and socks may be worn. All pesticide handlers must wear protective eyewear when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injection.

Non-WPS Uses:

Applicators and other handlers must wear:

- Shirt and pants
- Gloves
- Shoes plus socks

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 thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.
- Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water, 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 product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

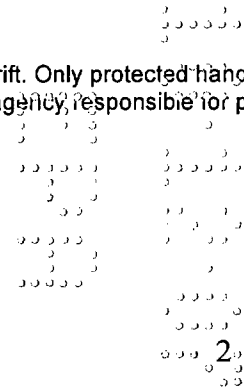
This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treatment area (site) is likely to occur.

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.



CONCRETE SLAB-ON-GROUND OR BASEMENTS: Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floor and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution, to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes should not extend below the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat soil which will be placed in the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor, fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Rodding in trench followed by flooding of trench and treatment of backfill may provide a better opportunity to achieve a continuous chemical treated zone than using soil rodding alone to establish a vertical termiticide treated zone.

CRAWL SPACES: Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

HOLLOW BLOCK FOUNDATIONS OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST-CONSTRUCTION TREATMENT

CONCRETE SLAB-ON-GROUND: To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. **DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS.** Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

An application should be made by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil as it is being placed in the trench.

Rodding can be done from the bottom of a shallow trench. When rodding, rod holes should be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod hole depth should not extend below the footing.

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BATH TRAPS: Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas should be treated with 3 gallons of solution per square foot. An access door or inspection vent should be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

CRAWL SPACES: When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to **PRE-CONSTRUCTION TREATMENT**). If unable to excavate, crawl space soil and wood treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform chemical treated zone. Use a very coarse spray at a pressure not exceeding 25 PSI at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil, wood and structural members contacting the soil at the above rates. Do not apply to inaccessible crawl space areas using pressures greater than 25 PSI at the treatment tool when the valve is open.

Treatment may also be made by drilling through the foundation wall or through the floor above and treating the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform chemical treated zone.

SHALLOW FOUNDATIONS: For shallow foundations, one foot or less in depth, dig a narrow trench approximately 6 inches wide and deep along the outside and inside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to the top of footer to provide a uniform treated zone. The dilution should be applied to the trench and mixed with the soil as it is placed in the trench.

BASEMENTS - OUTSIDE PERIMETER: Along the outside of the exterior walls, an application must be made by trenching or rodding within the trench. Rodding depth should be to the top of the footer, or to a minimum of 4 feet or according to state or local regulations. When rodding through a trench, dig a narrow trench about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone by rodding through the trench. Use a low pressure spray to treat soil which will be placed into the trench after rodding. Mix spray solution with the soil as it is being placed in the trench.

BASEMENTS - INSIDE PERIMETER: If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around Sewer pipes, floor drains, conduits, expansion joints or any cracks or holes in the basement floor. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone.

Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

HOLLOW BLOCK FOUNDATION OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

PLENUMS: For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing and conduits. The soil should be treated by trenching to a depth of 6 inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 PSI when measured at the treating tool when valve is on).

When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

TREATMENT AROUND WELLS OR CISTERNS: Do not contaminate wells or cisterns.

Structures With Wells/Cisterns Inside Foundations: Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

1. Do not apply within 5 feet of any well or cistern by rodding and/or trenching or by the backfill method. Treat soil between 5 and 10 feet from the well or cistern by the backfill method only. Treatment of soil adjacent to water pipes within 3 feet of grade should only be done by the backfill method.
 - a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
 - b) Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
 - c) After the treated soil has absorbed the solution, replace the soil into the trench.
2. Treat infested and/or damaged wood in place using an injection technique such as described in the **CONTROL OF WOOD INFESTING PESTS** section of this label.

Structures With Adjacent Wells/Cisterns and/or Other Water Bodies: Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipes) coming from the well to the structure, if the pipes) enter the structure within 3 feet of grade.
2. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

FOAM APPLICATIONS

Construction practices, soil subsidence and other factors may create situations in which a continuous chemical treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices, to provide a continuous treated zone.

Foam application may be made alone or in combination with conventional application methods, provided that the labeled amount of active ingredient per unit area is used.

Foam Application Use Directions: Mix appropriate concentration of IMI 2 LB INSECTICIDE in water and add the manufacturer's recommended quantity of foam agent to the IMI 2 LB INSECTICIDE solution (see table for foaming recommendations). Apply a sufficient volume of IMI 2 LB INSECTICIDE foam alone or in combination with liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

NOTE: Add the manufacturer's recommended quantity of foam agent to the IMI 2 LB INSECTICIDE solution.

[Only one of the tables below will be used based upon the size of container offered for sale]

[FOR 240 ML SIZE ONLY]

MIXING TABLE - IMI 2 LB INSECTICIDE FOAM

IMI 2 lb (mL)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM (0.05% ai)
160	1	20:1	20 gal
80	1	10:1	10 gal
40	1	5:1	5 gal

[FOR 55 FL OZ SIZE ONLY]

MIXING TABLE - IMI 2 LB INSECTICIDE FOAM

IMI 2 lb (fl oz)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM (0.05% ai)
6.9	1	25:1	25 gal
	2.5	10:1	
	5	5:1	
13.8	1	50:1	50 gal
	2.5	20:1	
	5	10:1	

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, wall voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

Foam and liquid applications must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of IMI 2 LB INSECTICIDE must be applied as a typical liquid treatment. The remaining 25% or fewer gallons is delivered to appropriate locations using a foam application.

NOTE: When foam is used solely to kill subterranean termites in above ground locations (such as feeding galleries in wooden framing, or in voids with framed walls), and whenever the target pest is other than subterranean termites (drywood termites, beetles, ants, etc.) dilute solutions of IMI 2 LB INSECTICIDE may be expanded by foaming without concentrating the IMI 2 LB INSECTICIDE solution as previously described for soil applications. Add the manufacturers' recommended volume of foaming agent to produce foam of the desired expansion ratio. Use application tips and methods suitable to the site and pest.

CONTROL OF WOOD INFESTING PESTS

For control of above ground termites and carpenter ants in localized areas, apply a 0.05 to 0.1% solution of sufficient volume of IMI 2 LB INSECTICIDE foam to voids and galleries in damaged wood, and in spaces between wooden structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to inaccessible areas by drilling, and then injecting the suspension or foam with a suitable directional injector into the damaged wood or wall voids. Termite carton nests in building voids may be injected with a 0.05 to 0.1% suspension or foam. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such nests are found. Application, to attics, crawl spaces, unfinished basements, or man-made voids may be made with a coarse fan spray of 0.05 to 0.1% solution or foam to control exposed worker and winged reproductive forms of termites or carpenter ants. This type of application is intended to be a supplemental treatment for control of above ground subterranean termites and carpenter ants.

It is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure. This may allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of IMI 2 LB INSECTICIDE can be made to these nests,

Use a 0.05% to 0.1% solution to control existing infestations of or to prevent infestation by termites or carpenter ants in trees, utility poles, fencing and decking materials, landscape timbers and similar non-structural wood-to-soil contacts. If possible, locate the interior infested cavity and inject a 0.05 to 0.1% solution or sufficient volume of IMI 2 LB INSECTICIDE foam using an appropriate treatment tool with a splashback guard. These non-structural wood-to-soil contacts may also be treated by applying a solution to the soil as a spot application or continuous treated zone applied as a drench or by rodding around the base of the plant(s) of soil contact(s). Rod holes should be placed approximately 3 inches away from the soil contact point(s) and spaced no more than 12 inches along the perimeter of the soil contact(s). For small poles or posts (< 6 inches in diameter), apply 1 gallon per foot of depth. For larger constructions, apply 4 gallons per 10 linear feet per foot of depth. Retreat as needed to maintain protection.

Termite carton nests in trees may be injected with a 0.05 to 0.1% solution or sufficient volume of foam using a pointed injection tool. Multiple injection points to varying depths may be necessary. Removal of carton material from trees is desirable but may not be necessary when foam application is used. In some instances, a perimeter application of a 0.05% to 0.1% solution applied to soil around the root flare of the tree may be necessary to prevent reinfestation by termites in the soil. For small trees (< 6 inches in diameter), apply 1 gallon of solution. For larger trees, apply 4 gallons per 10 linear feet (measured as the circumference at the root flare).

For protection of firewood or other wood products stored in contact with soil from carpenter ants and termites, treat soil prior to stacking with a 0.05 to 0.1% solution at 1 gallon per 10 square feet to prevent infestation. Curative application to the soil around firewood or other wood products stored in contact with soil may be made as described for non-structural wood-to-soil contacts (above).

Drywood termites and wood-infesting beetles or borers (such as, but not limited to, powder post beetles, anobiid or deathwatch beetles, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles). **Galleries and structure voids** can be treated with sprays, mists, or foams of a 0.05% to 0.1% IMI 2 LB INSECTICIDE solution. Locate galleries by using visual signs (frass or pellets, blistered wood, emergence or clean out holes), the presence of live insects, mechanical sounding techniques, or listening devices (e.g., stethoscopes, acoustic emission detectors). Penetrate the gallery system by drilling holes to receive the injector tip or treatment tool. Distribute drill holes to adequately cover the gallery system. [NOTE: Avoid drilling where electrical wiring, plumbing lines, etc. are located.] Apply IMI 2 LB INSECTICIDE solutions as a low pressure (about 20 psi) spray or by misting or, where appropriate, by foaming. It is not necessary to treat to the point where runoff is detected from adjacent holes. [NOTE: Do not apply where electrical shock hazards exist.] Drill holes should be sealed after treatment. Also, **wood surfaces** can be sprayed or misted with a 0.05% to 0.1% solution or, where appropriate, use a sufficient volume of foam. For inaccessible surfaces, drill and treat the interior of structural voids. Surfaces treated may include exposed wooden surfaces in crawlspaces, basements, or attics; wooden exterior surfaces such as decks, fencing, or siding, structural voids, channels in damaged wood, in spaces between wooden members of a structure, and junctions between wood and foundations. Apply by brushing or as a coarse, low pressure (about 20 psi) spray to the wood surface; apply sufficient volume to cover the surface to the point of wetness, but avoid applying to the point of runoff. When spraying overhead in living areas, cover surfaces below the treated area with plastic sheeting or similar material. Avoid contact with treated surfaces until spray deposits have dried. Retreat as needed to maintain protection.

Localized treatment for carpenter bees: Apply a 0.05% to 0.1% solution as a spray or mist, or sufficient volume of foam, directly into gallery entrance holes. Following treatment, entrance holes may be plugged with small pieces of steel wool or similar material.

RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide treated zone in the soil. The vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the treated zone. Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgment of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment, the applicator should consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

When another registered termite control product/system is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas, IMI 2 LB INSECTICIDE may be applied as a spot application in a secondary treatment to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks. The outside foundation wall, and areas of known or suspected activity at either a pre-construction or post-construction timing. These secondary treatments must be made applied in amounts and concentration in accordance with label directions relevant to the treatment area(s) to receive the secondary treatment.

PERIMETER PEST CONTROL

For control of ants in houses and other structures, apply a 0.05 to 0.1% solution as a general surface, spot crack and crevice or wall void application. Apply to surfaces on buildings, porches, patios and other structures, around doors and windows, eaves or attic vents. Utility entry points, soffit areas and other exterior openings (including foundation cracks or drilled holes) where the pests enter the structure or where they crawl or hide. Spray into cracks and crevices. Spray, mist or foam into voids where these ants or their nests are present. Apply the volume of spray mist or foam sufficient to cover the area, but do not allow excessive dripping or run-off to occur from vertical or overhead surfaces.

Treat soil, turf or ground cover adjacent to the structure where ants are trailing or may find food or harborage. Apply to flower, shrub or ornamental plant beds adjacent to the structure where ants may find food or forage. To control ants tunneling in soil apply a 0.05% to 0.1% solution as a drench or soil injection at intervals to establish a continuous treated zone. Treat along the edge of walls, driveways or other hard surfaces where ants are tunneling beneath the surface.

Aerial Nests: If ant nests are located in tree hollows or non-structural wooden construction (e.g.; posts, fences, decks) treat the interior cavity and/or the nest site by injecting a 0.05%-0.01% solution as a spray mist, or sufficient volume of foam.

Apply in sufficient water to cover the foliage and soil area being treated. Maximum application is once per month to maintain control.

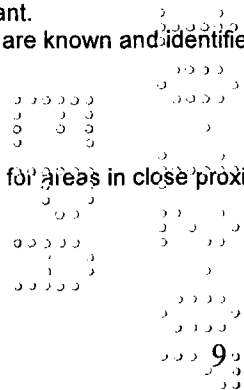
Do not allow residents or pets into the immediate area during the application or contact with treated areas until spray has dried. Interior applications for ant control are limited to spot, crack and crevice, or wall void applications only.

Do not use this product against native or imported fire ants, pharaoh or harvester ants.

NOTE: In instances of high pest pressures and quick knockdown or elimination at pest entry points is needed, additional treatments using IMI 2 LB INSECTICIDE with targeted applications of a pyrethroid such as TEMPO® SC ULTRA or SUSPEND® SC to doors and windows, utility entry points, and other places where these pests enter the structure may be made. Read and follow all label directions for use of this companion product.

GENERAL PRECAUTIONS FOR APPLICATIONS

- After treatment, plug and fill all holes drilled in concrete slab areas of the building with a suitable sealant.
- Do not apply solution until location of heat pipes, ducts, water and sewer lines and electrical conduits are known and identified. Caution must be taken to avoid puncturing and injection into the structural elements.
- Do not plant for the purpose of consumption, edible plants into the treated areas of soil.
- Avoid contamination of public and private water supplies.
- Use anti-backflow equipment or an air gap on filling hoses.
- Consult State, Federal, or local authorities for information regarding the approved treatment practices for areas in close proximity to potable water supplies.



APPLICATION ON TURFGRASS

IMI 2 LB INSECTICIDE may be used to control insect pests on turfgrass in home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, athletic fields and sod farms.

IMI 2 LB INSECTICIDE controls soil inhabiting pests such as Northern & Southern masked chafers, *Cyclocephala borealis*, *C. immaculata*, and/or *C. lurida*; Asiatic garden beetle, *Maladera castanea*; European chafer, *Rhizotrogus majalis*; Green June beetle, *Cotinis nitida*; May or June beetle, *Phyllophaga* spp.; Japanese beetle, *Popillia japonica*; Oriental beetle, *Anomala orientalis*; Billbugs, *Sphenophorus* spp.; Annual bluegrass weevil, *Hyperodes* spp.; Black turfgrass atenioides, *Ataenius spretulus* and *Aphodius* spp. European Crane Fly *Tipula paludosa*, and mole crickets, *scapteriscus* spp. IMI 2 LB INSECTICIDE can also be used for suppression of cutworms and chinch bugs.

For optimum control, make applications preceding or during the egg laying period of the target pest. The active ingredient in IMI 2 LB INSECTICIDE has enough residual activity so that applications can be made preceding the egg laying activity. Application timing can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. Most favorable control will be achieved when applications are made prior to egg hatch of the target pests, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

Do not make applications when turfgrass areas are waterlogged or the soil is saturated with water. Sufficient distribution of the active ingredient cannot be achieved under these conditions. The treated turf area must be in such a condition that the rainfall or irrigation will penetrate vertically in the soil profile. Applications cannot exceed a total of 1.6 pints (0.4 lb of active ingredient) per acre per year.

APPLICATION EQUIPMENT FOR USE ON TURFGRASS

Apply IMI 2 LB INSECTICIDE in sufficient water to provide adequate distribution in the treated area. The use of accurately calibrated equipment normally used for the application of turfgrass insecticides is required. Use equipment which will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off target drift. Check calibration periodically to ensure that equipment is working properly.

Do not apply through any irrigation system.

RECOMMENDED APPLICATIONS

TURF GRASSES

PEST	RATE	APPLICATION INSTRUCTIONS
Larvae of: Annual bluegrass weevil Asiatic garden beetle Billbug Black turfgrass atenioides Cutworms (suppression) European chafer European crane fly Green June Beetle Japanese beetle Northern Masked chafer Oriental beetle <i>Phyllophaga</i> spp. Southern masked chafer	1.25 to 1.6 pt/A or 0.46 to 0.6 fl. oz. (14 to 17 mL) per 1000 sq. ft.	For best control of grubs, billbugs, annual bluegrass weevil, and European Crane Fly, apply prior to egg hatch of the target pest. Read APPLICATION EQUIPMENT section of this label.
Chinchbugs (suppression) Mole crickets	1.6 pt /A or 0.6 fl. oz. (17 mL) per 1000 sq. ft.	For suppression of chinchbugs, apply before hatching of the first instar nymphs. To control mole crickets apply before or during the peak egg hatch period. Use a curative insecticide in addition to IMI 2 LB INSECTICIDE when adults or large nymphs are present and actively tunneling. Follow label instructions for other insecticides when tank-mixing.

Consult your local turf, state Agricultural Experiment Station, or State Extension Service Specialists for more specific information regarding timing of application.

NOTE: For best control, irrigation or rainfall should occur within 24 hours after application to move the active ingredient through the thatch. Do not apply more than 1.6 pt (0.4 lb of active ingredient) per acre per year. Avoid mowing turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.

APPLICATION TO ORNAMENTALS

IMI 2 LB INSECTICIDE is for use on ornamentals in commercial and residential landscapes and interior plantscapes. IMI 2 LB INSECTICIDE is a systemic product and will be taken up into the plant system from root uptake. To assure optimum effectiveness, the product must be placed where the growing portion of the target plant can absorb the active ingredient. The addition of a nitrogen containing fertilizer, where applicable, into the solution may enhance the uptake of the active ingredient. Application can be made by foliar application or soil applications; including soil injection, drenches, and broadcast sprays. Foliar applications offer locally systemic activity against insect pests.

When making soil applications to plants with woody stems, systemic activity will be delayed until the active ingredient is taken up throughout the plant. In some cases, this translocation delay could take 60 days or longer. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control.

For outdoor ornamentals, broadcast applications cannot exceed a total of 1.6 pints (0.4 lb of active ingredient) per acre per year.

Ant Management Programs

Use IMI 2 LB INSECTICIDE to control aphids, scale insects, mealybugs and other sucking pests on ornamentals to limit the honeydew available as a food source for ant populations. IMI 2 LB INSECTICIDE applications can be then be supplemented with residual sprays, bait placements or other ant control tactics to further reduce the pest population.

NOTE: Not for use in commercial greenhouses, nurseries, or on grass grown for seed, or on commercial fruit and nut trees.

APPLICATION EQUIPMENT FOR FOLIAR APPLICATIONS

IMI 2 LB INSECTICIDE mixes readily with water and may be used in many types of application equipment. Mix product with the required amount of water and apply as desired dependent upon the selected use pattern.

When making foliar applications on hard to wet foliage such as holly, pine, or ivy, the addition of a spreader/ sticker is recommended. If concentrate or mist type spray equipment is used, an equivalent amount of product should be used on the area sprayed, as would be used in a dilute application.

IMI 2 LB INSECTICIDE has been found to be compatible with commonly used fungicides, miticides, liquid fertilizers, and other commonly used insecticides. Check physical compatibility using the correct proportion of products in a small jar test if local experience is unavailable.

Do not apply through any irrigation system.

RECOMMENDED APPLICATIONS

FOR USE ONLY IN AND AROUND INDUSTRIAL AND COMMERCIAL BUILDINGS AND RESIDENTIAL AREAS.

CROP	PEST	RATE	APPLICATION INSTRUCTIONS
Trees Shrubs Evergreens Flowers Foliage plants Groundcovers Interior plantscapes	Adelgids Aphids Japanese beetles Lace bugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Mealybugs Psyllids Sawfly Larvae Thrips (suppression) Whiteflies	1.5 fl. oz. (45 mL) per 100 gal of water	Foliar Applications: Begin applications before the onset of high pest populations and reapply as needed.
	White grub larvae (such as Japanese beetle larvae, Chafer, Phyllophaga spp. Asiatic garden beetle, Oriental beetle)	0.46 to 0.6 fl. oz. (14 to 17 mL) per 1000 sq. ft.	Broadcast Applications: Use enough water to mix the product and thoroughly apply to the treatment area. Do not use less than 2 gallons of water per 1000 sq ft. For best results, irrigate after application to incorporate IMI 2 LB INSECTICIDE into the upper soil layer. For additional use directions, refer to the FLOWERS and GROUND COVERS section of this label.

FOLIAR APPLICATIONS FOR USE ONLY IN AND AROUND RESIDENTIAL AREAS

CROP	PEST	RATES	APPLICATION INSTRUCTIONS
<p>POME FRUITS Apple Crabapple Loquat Mayhaw Pear Pear (oriental) Quince</p>	<p>Aphids (except Woolly apple aphid) Leafhoppers (including glassy-winged sharpshooter) Leafminer Mealybugs* San Jose scale*</p>	<p>1.5 fl. oz. (45 mL) per 100 gal or 6.0 fl. oz./A¹</p>	<p>Apply specified dosage as foliar spray as needed after petal-fall is complete.</p> <p>For control of rosy apple aphid, apply prior to leafrolling caused by the pest.</p> <p>For first generation leafminer control, make first application as soon as petal-fall is complete. Greatest leafminer control will result from the earliest possible application. For second and succeeding generations of leafminer, optimal control is obtained from applications made early in the adult flight against egg and early instar larvae. A second application may be required 10 days later if severe pressure continues or if generations are overlapping. A single application may result in suppression only. IMI 2 LB INSECTICIDE will not control late stage larvae.</p> <p>For San Jose Scale, time applications to the crawler stage. Treat each generation.</p> <p>For late season (preharvest) control of leafhopper species, apply IMI 2 LB INSECTICIDE while most leafhoppers are in the nymphal stage.</p> <p>For optimal control of mealybug, insure good spray coverage of the trunk and scaffolding limbs or other resting sites of the mealybug.</p> <p>Do not apply more than 6.0 fluid ounces per acre in a single application. Do not make more than 5 applications.</p> <p>Allow 10 or more days between applications. Allow at least 7 days between last application and harvest.</p> <p>* Not for use in California for control on pears.</p>
<p>Pecan*</p>	<p>Yellow pecan aphid Black margined aphid Pecan leaf phylloxera Pecan spittlebug Pecan stem phylloxera</p>	<p>1.5 fl. oz. (45 mL) per 100 gal or 6.0 fl. oz./A¹</p>	<p>Make foliar applications as pests begin to build before populations become extreme. Two applications at a 10 to 14 day interval may be required to achieve control. Scout and retreat if needed.</p> <p>Thorough uniform coverage of foliage is necessary for optimal control. Addition of an organosilicone-based spray adjuvant at a rate not to exceed the adjuvant manufacturer's recommended use rate may improve coverage.</p> <p>Do not apply more than a total of 18.0 fluid ounces of IMI 2 LB INSECTICIDE per acre per year. Do not make more than 3 applications.</p> <p>Allow 10 or more days between applications.</p> <p>* Use on pecans not permitted in California unless directed by specific supplemental labeling.</p>

¹ The amount of IMI 2 LB INSECTICIDE required per acre will depend on tree size and volume of foliage present. The rate per acre is based on a standard of 400 gallons of dilute spray solution per acre for large trees.

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FOLIAR APPLICATION FOR USE ONLY IN AND AROUND INDUSTRIAL AND COMMERCIAL BUILDINGS AND RESIDENTIAL AREAS.

CROP	PEST	RATE	APPLICATION INSTRUCTIONS
Grapes	Leafhoppers (including glassy-winged sharpshooter) Mealybugs	1.5 fl. oz. (45 mL) per 100 gal or 3.0 fl. oz/A (90 mL/A)	Apply specified dosage as a foliar spray using 200 gallons of water per acre. Do not apply more than a total of 6.0 ounces of IMI 2 LB INSECTICIDE per acre per year. Allow at least 14 days between applications. Applications may be applied up to and including day of harvest.

RESTRICTIONS

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Avoid runoff or puddling of irrigation water following application. Keep children and pets off treated area until dry.
- Avoid application of IMI 2 LB INSECTICIDE to areas which are water logged or saturated, which will not allow penetration into the root zone of the plant.
- Do not apply more than 1.6 pt (0.4 lb of active ingredient) per acre per year.

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 tolerances for the active ingredient have been established, a 12-month plant-back interval should be observed.

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 water soluble packets in original container and out of reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking, invert to prevent leakage. If container is leaking or material spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticide below. In spill or leak incidents, keep unauthorized people away.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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 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 ALLOWED BY 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 ALLOWED BY 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.

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