59639-115 12-20-200-Form Approved, OMB No. 2070-0060, Approval expires 2-28-95 **OPP Identifier Number** Registration United States **Environmental Protection Agency Amendment** 300904 Washington, DC 20460 Other Application for Pesticide - Section I 1. Company/Product Number 2. EPA Product Manager 3. Proposed Classification 59639-115 Mr. Richard Gebken None Restricted 4. Company/Product (Name) ESTEEM 35 WP 10 5. Name and Address of Applicant (Include ZIP Code) 6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling Valent U.S.A. Corporation 1600 Riviera Ave., Suite 200 EPA Reg. No. Walnut Creek, CA 94596-8025 Check if this is a new address **Product Name** Section - II NOTIFICATION Amendment - Explain below. Final printed labels in repsonse to Agency letter dated DEC 2 0 2004 Resubmission in response to Agency letter dated ... "Me Too" Application. Notification - Explain below. Other - Explain below. Explanation: Use additional page(s) if necessary. (For section I and Section II.) NOTIFICATION: Addition of statement to not exceed maximum use fate of pyriproxyfen regardless of the product utilized. Section - III 1. Material This Product Will Be Packaged In: Child-Resistant Packaging Unit Packaging Water Soluble Packaging 2. Type of Container Metal Yes Yes Yes **Plastic** Νo Glagg Paper If "Yas" If "Yes" No. per No. per * Certification must Unit Packaging wgt. Other (Specify) Package wgt container container be submitted 5 oz. 3. Location of Net Contents Information 5. Location of Label Directions 4. Size(s) Retail Container On Labeling Container 6. Manner in Which Label is Affixed to Product Other Lithograph Paper plued Stenciled Section - IV 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) Name Title Telephone No. (Include Area Code) Linda Obrestad Labeling Specialist (925) 256-2791 6. Date Application Certification Received I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlinglly false or misleading statement may be punishable by fine or imprisonment or (Stamped) both under applicable law.

Labeling Specialist

5. Date

Enda Obrestad

4. Typed Name

Linda Obrestad

December 9, 2004

2.24

1600 Riviera Avenue Suite 200 P.O. Box 8025 Walnut Creek, CA 94596-8025 (925) 256-2700



December 9, 2004

ESTEEM® 35 WP EPA Reg No. 59639-115 Notification OPP. Identifier .No. 300904

CERTIFICATION STATEMENT

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Linda Alvrestad Linda Obrestad

Labeling Specialist

Registration and Regulatory Affairs

Valent U.S.A. Corporation

NOTIFICATION

DEC 2 0 2004



(EPA PRODUCT MANAGER: Text in brackets refers to the Alternate Brand Name and size.

[ABN: SEIZE™ 35 WP (INSECT GROWTH REGULATOR)]

ESTEEM® 35 WP (INSECT GROWTH REGULATOR)

Active Ingredient	By Wt.
*Pyriproxyfen	35.0%
Other Ingredients	
Total	

*2-[1-methyl-2-(4-phenoxyphenoxy) ethoxy]pyridine

ESTEEM 35 WP Insect Growth Regulator is a wettable powder formula containing 35% active ingredient.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE NEXT PAGE FOR ADDITIONAL PRECAUTIONARY STATEMENTS

NET CONTENTS 5 OUNCES

[ABN: NET CONTENTS 4 OUNCES]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS CAUTION

Causes moderate eye irritation. Harmful if inhaled, swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling.

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 eve.
- Call a poison control center or doctor for treatment advice.

If inhaled:

- 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 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 do 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.

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 **1-800-892-0099** for emergency medical treatment information.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear: long sleeved shirt, long pants, and socks plus shoes.

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

USER SAFETY RECOMMENDATIONS

Users 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 pesticide is toxic to fish and 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. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water by disposing of equipment washwaters or rinsate. Avoid direct application and/or spray drift to bee hives.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

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.

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 over long-sleeved shirt and long pants, waterproof gloves and socks plus shoes.

DISCLAIMER, RISKS OF USING THIS PRODUCT, LIMITED WARRANTY AND LIMITATION OF LIABILITY

IMPORTANT: Read the entire Label including this Disclaimer, Risks of Using this Product, Limited Warranty, and Limitation of Liability before using this product. If the terms are not acceptable THEN DO NOT USE THE PRODUCT; rather, return the unopened product within 15 days of purchase for a refund of the purchase price.

RISKS OF USING THIS PRODUCT

The Buyer and User (referred to collectively herein as "Buyer") of this product should be aware that there are inherent unintended risks associated with the use of this product which are impossible to eliminate. These risks include, but are not limited to, injury to plants and crops to which this product is applied, lack of control of the target pests or weeds, resistance of the target pest or weeds to this product, injury caused by drift, and injury to rotational crops caused by carryover in the soil. Such risks of crop injury, non-performance, resistance or other unintended consequences are unavoidable and may result because of such factors as weather, soil conditions, disease, moisture conditions, irrigation practices, condition of the crop at the time of application, presence of other materials either applied in the tank mix with this product or prior to application of this product, cultural practices or the manner of use or application, (or a combination of such factors) all of which are factors beyond the control of Valent. The Buyer should be aware that these inherent unintended risks may reduce the harvested yield of the crop in all or a portion of the treated acreage, or otherwise affect the crop such that additional care, treatment and expense are required to take the crop to harvest. If the Buyer chooses not to accept these risks, THEN THIS PRODUCT SHOULD NOT BE APPLIED. By applying this product Buyer acknowledges and accepts these inherent unintended risks AND AGREES THAT ALL SUCH RISKS ASSOCIATED WITH THE APPLICATION AND USE ARE ASSUMED BY THE BUYER.

Valent shall not be responsible for losses or damages (including, but not limited to, loss of yield, increased expenses of farming the crop or such incidental, consequential or special damages that may be claimed) resulting from use of this product in any manner not set forth on the label. Buyer assumes all risks associated with the use of this product in any manner or under conditions not specifically directed or approved on the label.

LIMITED WARRANTY

Valent warrants only that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the label, under average use conditions, when used strictly in accordance with the label and subject to the Risks of Using This Product as described above. EXCEPT AS SET FORTH ABOVE, VALENT MAKES NO OTHER WARRANTIES, EITHER EXPRESSED OR IMPLIED. No agent or representative of Valent or Seller is authorized to make or create any other express or implied warranty.

LIMITATION OF LIABILITY

In no event shall Valent or Seller be liable for any incidental, consequential, indirect or special damages resulting from the use or handling of this product. The limitation includes, but is not limited to, loss of yield on all or any portion of the treated acreage, increased care, treatment or other expenses required to take the crop to harvest, increased finance charges or altered finance ratings, emotional or mental distress and/or exemplary damages. THE EXCLUSIVE REMEDY OF THE BUYER, AND THE EXCLUSIVE MAXIMUM LIABILITY OF VALENT OR SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE THE RETURN OF THE PURCHASE PRICE OF THIS PRODUCT OR, AT THE ELECTION OF VALENT OR SELLER, THE REPLACEMENT OF THE PRODUCT.

PROMPT NOTICE OF CLAIM

Valent must be provided notice as soon as Buyer has reason to believe it may have a claim, but in no event later than twenty-one days from date of planting, or twenty-one days from the date of application, whichever is latter, so that an immediate inspection of the affected property and growing crops can be made.

If Buyer does not notify Valent of any claims, in such period, it shall be barred from obtaining any remedy.

NO AMENDMENTS

Valent and Seller offer this product, and Buyer accepts it, subject to the foregoing **Disclaimer**, **Risks of Using This Product**, **Limited Warranty** and **Limitation of Liability**, which may not be modified by any oral or written agreement.

TANK MIXES

NOTICE: Tank mixing or use of this product with any other product which is not specifically and expressly authorized by the label shall be the exclusive risk of user, applicator and/or application advisor.

Read and follow the entire label of each product to be used in the tank mix with this product.

WATER SOLUBLE PACKAGING

MULTIPLE PACKAGING

This bag contains multiple water soluble packets of ESTEEM 35 WP Insect Growth Regulator. Do not handle the packets with wet gloves or allow the packets to become wet prior to addition to spray tank. Do not break open packets. Refer to the Tables of Equivalents to calculate the number of packets to use. If all packets are not used, close and reseal outer container to protect remaining packet(s).

SINGLE PACKAGING

This bag contains one water soluble packet of ESTEEM 35 WP Insect Growth Regulator. Do not handle the packet with wet gloves or allow the packet to become wet prior to addition to spray tank. Do not break open packet. Refer to the Table of Equivalents to calculate the number of packets to use. Open outer bag by pulling perforated tearstrip and drop the unopened inner packet of ESTEEM 35 WP Insect Growth Regulator into spray tank.

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RATES OF ESTEEM 35 WP PER ACRE	# OF WATER SOLUBLE PACKETS TO TREAT 5 ACRES [ABN: 4 ACRES]
3 oz.	3
4 oz.	4
5 oz.	5

GENERAL INFORMATION

Do not apply this product through any type of irrigation system.

ESTEEM 35 WP is intended for use in Insect Pest Management (IPM) or Insect Resistance Management (IRM) programs. ESTEEM 35 WP will not control insect adults, and it is recommended to be used in combination and/or rotation with other IPM or IRM materials. Contact your local state extension service for details.

ESTEEM 35 WP acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

COTTON

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

ESTEEM 35 WP does exhibit translaminar movement which means that ESTEEM 35 WP applied to the upper surfaces of the leaves will move to the lower surface of the leaf. This translaminar movement is very important to chemical control of whitefly since one of the major obstacles is getting the product to the underside of the leaves where whitefly are present.

CROP	PESTS	PRODUCT RATE PER ACRE	SPECIAL INSTRUCTIONS
Cotton	Banded Wing Whitefly Greenhouse Whitefly	2.5 to 3 oz.	Apply with air or ground equipment in adequate water for uniform coverage:
	Silverleaf Whitefly Sweetpotato Whitefly	Do not apply less than 2.5 oz./A	By Air: 3 to 10 gals./A By Ground:10 to 50 gals./A
			HIGHER WATER VOLUMES MAY PROVIDE IMPROVED INSECT CONTROL.
			Make only one application per growing season.
			Begin application when whiteflies reach threshold levels per University/Extension recommendations (e.g. 3 to 5 adults per leaf and/or equivalent levels of immatures).
			Under severe pressure, use the higher recommended rates.
			Only whole fields should be treated.
	Do not exceed 3 oz. ESTEEMRegardless of formulation do	TEEM 35 WP application per growing I 35 WP per acre per season. not exceed 0.067 lb. pyriproxyfen per	Only whole fields should be treated.

MANAGING WHITEFLY RESISTANCE: Repeated use of the same class of insecticides with similar modes of action can lead to the buildup of resistant whitefly strains. To optimize resistance management practices, Valent U.S.A. Corporation is restricting ESTEEM 35 WP Insect Growth Regulator to one application per growing season. ESTEEM 35 WP may be used in alternation with other IGR materials possessing dissimilar modes of action and/or with other chemical classes of insecticides. Valent also does not recommend using rates below 2.5 oz. per acre for whitefly control because reduced rates can lead to a greater potential for resistance development. Follow local, state and federal IPM and Insect Resistance Management (IRM) recommendations. Read and follow all product labels before applying any insecticide.

POME FRUIT

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

CROP	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS
Pome Fruit: Apple Crabapple Loquat Mayhaw Quince	Codling Moth Suppression of: Pandemis Leafroller Obliquebanded Leafroller	4 to 5 oz.	Apply by ground with airblast equipment in a minimum of 50 gals./A. Thorough coverage is critical for control. It is essential to use adequate water volume to ensure thorough coverage. 1st Generation Codling Moth: Apply at Biofix plus 100 degree days (this is usually close to petal fall). Make a second application 14 to 21 days later or timed to coincide with peak moth flights. For subsequent applications, if needed, apply other insecticides registered for Codling Moth control. The addition of oil has been shown to increase Codling Moth activity of ESTEEM 35 WP. Follow local recommendations regarding inseason use and rates of oil in your area. Obliquebanded and Pandemis Leafroller: Apply to the overwintering larvae at pink to petal fall tree growth stage. ESTEEM 35 WP does not directly control the larvae but inhibits normal pupation and adult emergence.
	Florida Red Scale Lecanium Scale San Jose Scale	4 to 5 oz.	Apply by ground with airblast equipment in a minimum of 50 gals./A. Thorough coverage is critical for control. It is essential to use adequate water volume to ensure thorough coverage. Apply at delayed dormant through pink. For delayed dormant use a superior spray oil at the manufacturer's recommended rate of oil. Under heavy scale pressure, use the higher rate of ESTEEM 35 WP. Scale: For control in-season, make application in cover sprays when scale crawlers first emerge. The use of oil at the crawler emergence stage has been shown to improve control. Follow local recommendations regarding in-season use and rates of oil in your area.

continued

CROP	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS
Pome Fruit (continued): Apple Crabapple Loquat Mayhaw Quince	Green Apple Aphid Rosy Apple Aphid Spirea Aphid Spotted Tentiform Leafminer Western Tentiform Leafminer	3 to 5 oz.	Apply by ground with airblast equipment in a minimum of 50 gals./A. Thorough coverage is critical for control. It is essential to use adequate water volume to ensure thorough coverage. Leafminers: Apply at peak moth flight for control of 1st or 2nd generation. This usually occurs at pre-pink to pink apple stage for 1st generation and 2nd cover for 2nd generation.
			Rosy Apple Aphid: Apply at 1/2" green apple growth stage.
			Green Apple & Spirea Aphid: Apply when aphids first appear, but before aphids are colonized.
			TIMING IS CRITICAL FOR ACCEPTABLE APHID CONTROL.
Pear Oriental Pear	Pear Psylla	4 to 5 oz.	Apply by ground with airblast equipment in 75 to 400 gals./A with a superior spray oil at manufacturer's recommended rates for the stage of growth. It is essential to use adequate water volume to ensure thorough coverage.
			Apply a single application during the delayed dormant to pink stage of growth at 5 oz./A or make two applications from delayed dormant through petal fall stage of growth at 4 to 5 oz./A. Make application just before sustained egg lay is anticipated.
			DO NOT USE SKIP ROWS DURING APPLICATION.
		_	For in-season control of pear psylla, use an insecticide recommended for this use.
	Lecanium Scale San Jose Scale	4 to 5 oz.	Apply by ground with airblast equipment in 100 to 400 gais./A at delayed dormant with a superior spray oil at the manufacturer's recommended rates. Under heavy scale pressure, use the higher rate.
			Apply in sufficient water volume for tree size. Thorough coverage is critical for control. It is essential to use adequate water volume to ensure thorough coverage.
			For control of scale in-season make application in cover sprays when scale crawlers first emerge. The use of oil at the crawler emergence stage has been shown to improve performance. Follow local recommendations regarding in-season use and rates of oil in your area.

continued

СКОР	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS		
Pome Fruit (continued): Pear Oriental Pear	Codling Moth Suppression of: Obliquebanded Leafroller Pandemis Leafroller	4 to 5 oz.	Apply by ground with airblast equipment in 100 to 400 gals./A. 1st Generation Codling Moth: Apply at Biofix plus 100 degree days. Make a second application 14 to 21 days later or timed to coincide with peak moth flights. For subsequent applications, if needed, apply other insecticides registered for Codling Moth control. The addition of oil has been shown to increase Codling Moth activity of ESTEEM 35 WP. Follow local recommendations regarding in-season use and rates of oil in your area. For additional generations apply other insecticides registered for Codling Moth Control.		
	ESTEEM 35 WP may be mixed and/or alternated with commonly used insecticides to comply with local IPM programs and Resistance Management programs. Do not apply within 45 days of harvest. Do not make more than 2 ESTEEM 35 WP applications per growing season. Do not exceed 10 oz. of ESTEEM 35 WP per acre per season. Regardless of formulation do not exceed 0.218 lb. pyriproxyfen per acre per season. Do not apply earlier than 14 days after last ESTEEM 35 WP treatment.				

CITRUS

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

CROP	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS	
Citrus	Black Scale Brown Soft Scale California Red Scale Florida Red Scale Snow Scale	5 oz.	Apply with ground equipment in 200 to 1500 gals /A. Apply in sufficient water volume for tree size. Thorough coverage is critical for control. It is essential to use adequate water volume to ensure thorough coverage. Apply anytime prior to fruit becoming infested when scale is in the crawler stage. Thorough coverage is essential for good control. ESTEEM 35 WP may be applied with superior spray oils at 1/2 to 1%. Follow the manufacturer's directions and recommendations on timing and rates. NOTE: For scale apply only one application	
	Citrus Black Fly Citrus Leafminer Citrus Whitefly	3 oz.	during emergence of scale crawlers per calendar year. Apply with ground application in 200 to 1500 gals./A. Apply in sufficient water volume for tree size. Thorough coverage is critical for control. It is essential to use adequate water volume to ensure thorough coverage. Apply when pests are just beginning to build and before infestation has occurred. Thorough coverage is essential for good control.	
	ESTEEM 35 WP may be mixed and/or alternated with commonly used insecticides to comply with local IPM programs and Resistance Management programs. Do not apply within 1 day of harvest. Do not make more than 2 ESTEEM 35 WP applications per growing season. Do not exceed 8 oz. of ESTEEM 35 WP per acre per season. Regardless of formulation do not exceed 0.134 lb. pyriproxyfen per acre per season. Do not apply earlier than 21 days after last ESTEEM 35 WP treatment.			

TREE NUTS

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

CROP	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS
Tree Nuts: Almond	Black Scale San Jose Scale Suppression of: Peach Twig Borer	4 to 5 oz.	Apply with ground equipment in 100 to 400 gals./A. Coverage is essential for good control. Apply in sufficient water volume for tree size. Use of higher water volume will assure better coverage. Apply at either dormant, delayed dormant or an in-season cover spray. At dormant, delayed dormant use a spray oil at the manufacturer's recommended oil rate. In a cover spray make applications when scale crawlers first emerge. Follow local recommendations regarding inseason use and rates of oil in your area. ESTEEM 35 WP has provided good suppression of Peach Twig Borer when applied delayed dormant through bloom sprays.
	Do not exceed 5 oz.	han 1 ESTEEM 35 WP app of ESTEEM 35 WP per act	olication per growing season. re per season. lb. pyriproxyfen per acre per season.

continued

CROPS	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS
Tree Nuts (continued): Beechnut Brazil Butternut Cashew Chestnut Chinquapin Filbert (Hazelnut) Hickory Macadamia Pecan Pistachio Walnut	Codling Moth Dusky Veined Aphid Walnut Aphid	5 oz.	Apply with ground equipment in 100 to 400 gals./A. Apply in sufficient water volume for tree size. Thorough coverage is critical for control. It is essential to use adequate water volume to ensure thorough coverage. 1st Generation Codling Moth: Apply at Biofix plus 100 degree days. Make a second application 14 to 21 days later or timed to coincide with peak moth flights. For subsequent applications, if needed, apply other insecticides registered for Codling Moth control. The addition of oil has been shown to increase Codling Moth activity of ESTEEM 35 WP. Follow local recommendations regarding in-season use and rates of oil in your area.
	Black Scale Brown Soft Scale Italian Scale Lecanium Scale San Jose Scale Walnut Scale Suppression of: Peach Twig Borer	4 to 5 oz.	Apply with ground equipment in 100 to 400 gals./A at either dormant, delayed dormant or an in-season cover spray. The addition of a superior spray oil at dormant or delayed dormant may improve scale control. However, do not use a spray oil in oil sensitive crops such as Walnut. Follow manufacturer's recommendations regarding use and rates of oil for your area. In a cover spray make applications when scale crawlers first emerge. Follow local recommendations regarding in-season use and rates of oil in your area. Under heavy scale pressure, use the higher rate. Coverage is essential for good control. Apply in sufficient water volume for tree size. Use of higher water volume will assure better coverage.
	Do not apply within a Do not exceed 10 oz Regardless of formu	Resistance Management 21 days of harvest. han 2 ESTEEM 35 WP ap z. of ESTEEM 35 WP per alation do not exceed 0.21	pplications per growing season.

FRUITING VEGETABLES

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

ESTEEM 35 WP does exhibit translaminar movement which means that ESTEEM 35 WP applied to the upper surfaces of the leaves will move to the lower surface of the leaf. This translaminar movement is very important to chemical control of whitefly since one of the major obstacles is getting the product to the underside of the leaves where whitefly are present.

CROPS	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS
Fruiting Vegetables: Eggplant Ground Cherry Okra Pepino Pepper Tomatillo Tomato	Banded Wing Whitefly Greenhouse Whitefly Silverleaf Whitefly Sweetpotato Whitefly	2.5 to 3 oz. Do not apply less than 2.5 oz./A. of ESTEEM 35 WP when used as a stand alone application.	Apply with air or ground equipment in adequate water for uniform coverage: By Air:
	Banded Wing Whitefly Cabbage Looper Green Peach Aphid Greenhouse Whitefly (immatures & aduits) Silverleaf Whitefly Sweetpotato Whitefly Tobacco Hornworm	1.8 to 2.5 oz. + ORTHENE® 75 S 0.66 to 1.33 lbs./A or ORTHENE 97 0.5 to 1.0 lb./A	Apply as a tank mix with ground equipment for uniform coverage (25 to 150 gals./A. by ground). Make application when eggs or insects first appear. If control is needed during this period use an alternate insecticide registered for the target pest. ESTEEM 35 WP may also be mixed or alternated with commonly used insecticides to comply with local IPM programs. Comply with all applicable directions, restrictions and precautions on the registered labels for ORTHENE 75 S or ORTHENE 97.
	 Do not exceed 6 oz. ESTE Regardless of formulation Do not apply earlier than 1 	ESTEEM 35 WP applications p EM 35 WP per acre per seasor do not exceed 0.134 lb. pyripro 4 days after last ESTEEM 35 W r than those with registered pyr	n. xyfen per acre per season.

continued

CROP	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS
Fruiting Vegetables (continued): Tomato	Banded Wing Whitefly Beet Armyworm Fruitworm Greenhouse Whitefly (immatures & adults) Potato Aphid Silverleaf Whitefly Sweetpotato Whitefly Thrips Tomato Pinworm Yellowstriped Armyworm	1.8 to 2.5 oz. + MONITOR® 4 Spray 24 fl. oz. + DANITOL® 2.4 EC Spray 10 ¾ fl. oz.	EARLY SEASON WHITEFLY CONTROL PROGRAM FOR REDUCTION OF GEMINIVIRUS: Apply as a tank mix with ground equipment for uniform coverage (10 to 120 gals./A). Make application when scouting first indicates adult whiteflies are on young plants. NOTE: This may result in treatment immediately following transplanting. MID TO LATE SEASON WHITEFLY CONTROL PROGRAM FOR PREVENTION OF IRREGULAR FRUIT RIPENING: Apply as a tank mix with ground equipment for uniform coverage (20 to 120 gals./A. by ground). Make application when scouting indicates whiteflies are present. ESTEEM 35 WP may also be mixed or alternated with commonly used insecticides to comply with local IPM programs. Comply with all applicable directions, restrictions and precautions on the registered labels for MONITOR 4 Spray and DANITOL 2.4 EC Spray.
	 Do not exceed 5 oz. ESTE Regardless of formulation Do not apply earlier than 1 	ESTEEM 35 WP applications per g EM 35 WP per acre per season. do not exceed 0.109 lb. pyriproxyfe 4 days after last ESTEEM 35 WP t r than those with registered pyripro	en per acre per season.

STONE FRUIT

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

CROPS	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS
Stone Fruit: Apricot Cherry Chickasaw Plum Damson Plum Fresh Prune Japanese Plum Nectarine Peach Plum Plumcot Prune	Lecanium Scale San Jose Scale Suppression of: Peach Twig Borer Oriental Fruit Moth	4 to 5 oz.	Apply in 100 to 400 gals./A. with ground equipment. Coverage is essential for good control. Apply in sufficient water volume for tree size. Use of higher water volume will assure better coverage. Scale: Apply at dormant, delayed dormant or as an in-season cover spray: At dormant, delayed dormant, use a spray oil at the manufacturer's recommended oil rate. Under heavy scale pressure, use the higher rate of ESTEEM 35 WP. Peach Twig Borer: ESTEEM 35 WP has provided good suppression of Peach Twig Borer when applied delayed dormant through bloom sprays. Use a spray oil at the manufacturer's recommended rate for the stage of crop growth.
	In-season sprays of ESTEEM 35 WP may not protect fruit from blemishes by scale. ESTEEM 35 WP may be mixed and/or alternated with commonly used insecticides to comply with local IPM programs and Resistance Management programs. Do not apply within 14 days of harvest. Do not make more than 3 ESTEEM 35 WP applications per growing season. Do not exceed 15 oz. of ESTEEM 35 WP per acre per season. Regardless of formulation do not exceed 0.327 lb. pyriproxyfen per acre per season. Do not apply earlier than 14 days after last ESTEEM 35 WP treatment.		

BRASSICA LEAFY VEGETABLES

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

ESTEEM 35 WP does exhibit translaminar movement which means that ESTEEM 35 WP applied to the upper surfaces of the leaves will move to the lower surface of the leaf. This translaminar movement is very important to chemical control of whitefly since one of the major obstacles is getting the product to the underside of the leaves where whitefly are present.

CROPS	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS
Brassica Leafy Vegetables: Broccoli Broccoti Raab (rapini) Brussels Sprouts Cabbage Cauliflower Cavalo Broccolo Chinese Broccoli (gailon) Chinese Cabbage (bok choy and napa) Chinese Mustard (gai choy) Collards Kale Kohlrabi Mizuna Mustard Greens Mustard Spinach Rape Greens	 Do not exceed 6 oz. ESTE Regardless of formulation of Do not apply earlier than 14 	ESTEEM 35 WP applice EM 35 WP per acre per do not exceed 0.134 lb 4 days after last ESTE r than those with regist	o, pyriproxyfen per acre per season.

MANAGING WHITEFLY RESISTANCE: Repeated use of the same class of insecticides with similar modes of action can lead to the buildup of resistant whitefly strains. To optimize resistance management practices, Valent U.S.A. Corporation is restricting ESTEEM 35 WP Insect Growth Regulator to two applications per growing season. ESTEEM 35 WP may be used in alternation with other IGR materials possessing dissimilar modes of action and/or with other chemical classes of insecticides. Valent also does not recommend using rates below 2.5 oz./A for whitefly control because reduced rates can lead to a greater potential for resistance development. Follow local, state and federal IPM and Insect Resistance Management (IRM) recommendations. Read and follow all product labels before applying any insecticide.

OLIVE

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

CROP	PESTS	PRODUCT RATES PER ACRE	SPECIAL INSTRUCTIONS		
Olive	Black Scale San Jose Scale	4 to 5 oz.	Apply with ground equipment in 100 to 400 gals./A. Apply in sufficient water volume for tree size. Thorough coverage is critical for adequate control. It is essential to use adequate water volume to ensure thorough coverage. Apply at either dormant, delayed dormant or an in-season cover spray. At dormant, delayed dormant use a spray oil at the manufacturer's recommended oil rate. In a cover spray make applications when scale crawlers first emerge. Follow local recommendations regarding inseason use and rates of oil in your area. Under heavy scale pressure, use the higher rate of ESTEEM 35 WP.		
	ESTEEM 35 WP may be mixed and/or alternated with commonly used insecticides to comply with local IPM programs and Resistance Management programs. Do not apply within 7 days of harvest. Do not make more than 2 ESTEEM 35 WP applications per growing season. Do not exceed 10 oz. of ESTEEM 35 WP per acre per season. Regardless of formulation do not exceed 0.218 lb. pyriproxyfen per acre per season. Do not apply earlier than 14 days after last ESTEEM 35 WP treatment.				

CUCURBITS

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

ESTEEM 35 WP does exhibit translaminar movement which means that ESTEEM 35 WP applied to the upper surfaces of the leaves will move to the lower surface of the leaf. This translaminar movement is very important to chemical control of whitefly since one of the major obstacles is getting the product to the underside of the leaves where whitefly are present.

CROP	PESTS	PRODUCT RATE PER ACRE	SPECIAL INSTRUCTIONS	
Cucurbits: Balsam Apple Balsam Pear Bitter Melon Cantaloupe Chayote Chinese Cucumber Chinese Waxgourd Citron Melon Cucumber Edible Gourd Gherkin Momordica spp Muskmelon Pumpkin Summer Squash Watermelon Winter Squash	Banded Wing Whitefly Greenhouse Whitefly Silverleaf Whitefly Sweetpotato Whitefly	2.5 to 3 oz. Do not apply less than 2.5 oz./A.	Apply with air or ground equipment in adequate water for uniform coverage: By air:	
	 Do not apply within 7 days of harvest. Do not make more than 2 ESTEEM 35 WP applications per growing season. Do not exceed 6 oz. ESTEEM 35 WP per acre per season. Regardless of formulation do not exceed 0.134 lb. pyriproxyfen per acre per season. Do not apply earlier than 14 days after last ESTEEM 35 WP treatment. Do not plant any crop other than those with registered pyriproxyfen uses in treated areas sooner than 30 days after the last application. 			

MANAGING WHITEFLY RESISTANCE: Repeated use of the same class of insecticides with similar modes of action can lead to the buildup of resistant whitefly strains. To optimize resistance management practices, Valent U.S.A. Corporation is restricting ESTEEM 35 WP Insect Growth Regulator to two applications per growing season. ESTEEM 35 WP may be used in alternation with other IGR materials possessing dissimilar modes of action and/or with other chemical classes of insecticides. Valent also does not recommend using rates below 2.5 oz./A for whitefly control because reduced rates can lead to a greater potential for resistance development. Follow local, state and federal IPM and Insect Resistance Management (IRM) recommendations. Read and follow all product labels before applying any insecticide.

TROPICAL & SUBTROPICAL FRUIT

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

CROPS	PEST	PRODUCT RATE PER ACRE	SPECIAL INSTRUCTIONS
Acerola Atemoya Avocado Biriba Black Sapote Canistel Cherimoya Custard Apple Feijoa Guava Ilama Jaboticaba Longan Lychee Mamey Sapote Mango Papaya Passionfruit Pulasan Rambutan Sapodilla	Scale	5 oz.	Apply with ground or air equipment as a full coverage spray (minimum of 5 gals./A by air or 50 gals./A by ground). Thorough coverage is critical for adequate control. It is essential to use adequate water volume to ensure thorough coverage. Apply at either dormant, delayed dormant or as an in-season cover spray. At dormant or delayed dormant use a spray oil at the manufacturer's recommended oil rate. In a cover spray make applications when scale crawlers first emerge. Follow local recommendations regarding inseason use and rates of oil in your area.
Soursop Spanish Lime Star Apple Starfruit Sugar Apple Wax Jambu	ESTEEM 35 WP may be mixed and/or alternated with commonly used insecticides to comply with local IPM programs and resistance management programs. Do not apply within 14 days of harvest. Do not make more than 2 ESTEEM 35 WP applications per growing season. Do not exceed 10 oz. of ESTEEM 35 WP per acre per season. Regardless of formulation do not exceed 0.218 lb. pyriproxyfen per acre per season. Do not apply earlier than 14 days after last ESTEEM 35 WP treatment.		

BUSHBERRIES

GENERAL: ESTEEM 35 WP Insect Growth Regulator acts by suppressing embryogenesis within the insect egg and by inhibiting metamorphosis and adult emergence of target insects. ESTEEM 35 WP has no activity on adult insects, but hatching of eggs laid by treated adults will be suppressed. Since ESTEEM 35 WP is an Insect Growth Regulator (IGR) and activity depends on the insect's development, evidence of activity will be slower than typical contact insecticides.

CROPS	PESTS	PRODUCT RATE PER ACRE	SPECIAL INSTRUCTIONS	
Bushberries: Blueberry Currant Elderberry Gooseberry Huckleberry Juneberry Lingonberry Salal	Cherry Fruitworm Cranberry Fruitworm Lecanium Scale	5 oz.	Apply with ground or air equipment as a full coverage spray (minimum of 5 gals./A by air or 50 gals./A by ground). Thorough coverage is critical for adequate control. It is essential to use adequate water volume to ensure thorough coverage. Fruitworms: Apply when egg laying begins and again at petal fall. Additional applications of another insecticide, at 10 - 14 day intervals, may be needed under high population pressure or sustained moth flight. Lecanium Scale: Apply at either dormant, delayed dormant or as an in-season cover spray. At dormant or delayed dormant use a spray oil at the manufacturer's recommended oil rate. In a cover spray make applications when scale crawlers first emerge. Follow local recommendations regarding in-season use and rates of oil in your area.	
	ESTEEM 35 WP may be mixed and/or alternated with commonly used insecticides to comply with local IPM programs and Resistance Management programs. Do not apply within 7 days of harvest. Do not make more than 2 ESTEEM 35 WP applications per growing season. Do not exceed 10 oz. of ESTEEM 35 WP per acre per season. Regardless of formulation do not exceed 0.218 lb. pyriproxyfen per acre per season. Do not apply earlier than 14 days after last ESTEEM 35 WP treatment.			

STORAGE AND DISPOSAL

PROHIBITIONS

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

PESTICIDE STORAGE

Store in a cool dry place.

Keep pesticide in original container.

Keep container closed when not in use.

Do not put concentrate or dilute into food or drink containers.

Not for use or storage in or around the home.

For help with any spill, leak, fire or exposure involving this material, call day or night 1-800-892-0099.

PESTICIDE DISPOSAL

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

CONTAINER DISPOSAL

Do not reuse the outer bag. Dispose the outer bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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DANITOL® - Reg. TM of Sumitomo Chemical Company, Ltd. ESTEEM® - Reg. TM of Valent U.S.A. Corporation MONITOR® - Reg. TM of Valent U.S.A. Corporation ORTHENE® - Reg. TM of OMS Investments, Inc.

Manufactured for:

Valent U.S.A. Corporation P.O. Box 8025 Walnut Creek, CA 94596-8025 www.valent.com

Made in U.S.A.

EPA Reg. No. 59639-115	
EPA Est. No.	

December 9, 2004



Knack® Insect Growth Regulator EPA Reg. No. 59639-95 Esteem® Ant Bait (Insect Growth Regulator) EPA Reg. No. 59639-114 Esteem® 35 WP (Insect Growth Regulator) EPA Reg. No. 59639-115

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Dear 'Mr. Gebken:

Valent JU.S.A. is submitting notifications for revised labeling for our products Knack Insect Growth Regulator (EPA Reg. No. 59639-95, OPP ID. No. 300902) and Esteem 35 WP (EPA Reg. No. 59639-115, OPP ID. No. 300904). The current labels for these products are being amended to include a statement to not exceed the maximum use fate of pyriproxyfen regardless of the product utilized.

Esteerm Ant Bait (EPA Reg. No. 59639-114, OPP ID. No. 300903) label was amended to correct the current maximum use fate of pyriproxyfen regardless of the product utilized for Citrus only on page 18.

We have enclosed a label clearly marked in red and a clean copy, applications for all 3 products (OPP ID. No's. 300902, 300903 & 300904), a Certification Statement, a CD that includes both a word important and pdf document of each label and a Certification with Respect to Label Integration.

If you sanould have any questions, please contact me at (925) 256-2791 or Eric Maurer in our Washington DC office at (202) 872-4682.

Sincerely, Linda (Hirestad

Linda Obrestad Labeling Specialist

Registration and Regulatory Affairs

Enclos:ures