

66222-199

09-07-2010

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SEP 7 2010

Anne Stout
Makhteshim Agan of North America, Inc.
4515 Falls of Neuse Rd., Suite 300
Raleigh, NC 27609

Subject: Notification; Per PR-Notice 98-10
Quali-Pro Imidacloprid 75 WSB
EPA Reg. No. 66222-199

Dear Ms. Stout:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated September 3, 2010 for the product the product referenced above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls 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 regarding this letter, please contact me at (703) 306-0415 or davis.kable@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", with a long horizontal flourish extending to the right.

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Please read instructions on reverse before completing form.

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

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 66222-199	2. EPA Product Manager Linda Arrington	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Quali-Pro Imidacloprid 75 WSB	PM# Registration Support Branch	
5. Name and Address of Applicant (Include ZIP Code) Makhteshim Agan of North America, Inc. 4515 Falls of Neuse Rd., Suite 300 Raleigh, NC 27609 <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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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NOTIFICATION

SEP - 7 2010


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

Notification of alternate marketing language to accommodate a state-specific restriction. (This submission supercedes the 8-3-10 submission.) 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 for 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:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted			
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"/> _____
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 Anne Stout	Title Registration Specialist	Telephone No. (Include Area Code) 901-861-4400	
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 Anne Stout	5. Date 9-3-10		



September 3, 2010

Registration Support Branch
Document Processing Desk (NOTIF)
U.S. Environmental Protection Agency
Registration Division (7504P)
Ariel Rios Building
1200 Pennsylvania Ave, NW
Washington, DC 20460

Re: Quali-Pro Imidacloprid 75 WSB, EPA Reg. No. 66222-199
Notification of Addition of Alternate Marketing Language per PRN 98-10
THIS SUBMISSION SUPERCEDES THE SUBMISSION DATED 8-3-10

To Whom It May Concern:

Makhteshim Agan of North America, Inc. is notifying the Agency of its intention to add alternate marketing language to the referenced product as allowed in PRN 98-10. Note that this submission supercedes the submission dated 8-3-10; there was a bad formatting error on page 6 of the label that was submitted with that notification, and we didn't want to leave the incorrect label on file at EPA.

We certify the following:

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 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.

In support of this submission, the following documents are attached:

- Application for registration (EPA Form 8570-1)
- One copy of final printed labeling with the addition marked in yellow

Should you have any questions regarding this submission, please contact me at 901-861-4400 or by email at annies@manainc.com.

Sincerely,

Anne Stout
Registration Specialist

Enclosures

QUALI-PRO

Imidacloprid 75 WSB

Insecticide in Water-Soluble Packets

For foliar and systemic insect control in turfgrass (including sod farms), landscape ornamentals, fruit and nut trees, and interior plantscapes.

ACTIVE INGREDIENT:	% BY WT.
Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	75.0%
OTHER INGREDIENTS:	25.0%
TOTAL:	100.0%

Do not remove packets from container except for immediate use.

Keep water-soluble packets in this container and store in a cool, dry place but not below freezing (32° F).

Contains imidacloprid, the active ingredient in MERIT 75 WSP. Quali-Pro Imidacloprid 75 WSB is not manufactured or distributed by Bayer.

EPA Reg. No. 66222-199

EPA Est. No. 39578-TX-001

KEEP OUT OF REACH OF CHILDREN CAUTION

NOTIFICATION**SEP - 7 2010**

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of 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 eye open and rinse slowly and gently with water for 15 to 20 minutes.• Remove contact lenses, if present, after the first 5 minutes; then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact ProSAR at 1-877-250-9291 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

For additional precautionary, handling, and use statements, see inside of this booklet.

Manufactured for:

Makhteshim Agan of North America, Inc.
4515 Falls of Neuse Rd., Suite 300 • Raleigh, NC 27609

Net Contents: 6.4 Ounces (4 x 1.6 Ounce Water-Soluble Packets)

EPA 042310/Notif 090310/Rev C

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PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

WPS Uses: Applicators and other handlers who handle this product for any use covered by the Worker Protection Standard (40 CFR Part 170) – in general, agricultural plant use (e.g., use on sod farms) 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.

Non-WPS Uses: Applicators and other handlers who handle this product for any use NOT covered by the Worker Protection Standard (40 CFR Part 170) 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(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

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 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.

Do not formulate this product into other end-use products.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

Exception: If the product is applied by drenching, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants, soil, or water is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC), or Viton
- Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Keep children and pets off treated area until dry.

State Specific Restrictions:

- The state of Arizona has not approved this product for use on agricultural sites. Do not use this product on uses considered by the Arizona statutes to be agricultural uses.

TURFGRASS (INCLUDING SOD FARMS, LANDSCAPE ORNAMENTALS, FRUIT AND NUT TREES, AND INTERIOR PLANTSCAPES)

Mixing: Inside each foil pouch is a clear, inner, water-soluble packet containing the Quali-Pro Imidacloprid 75 WSB. Do not allow packets to become wet prior to adding to the spray tank. Do not handle the clear, inner packets with wet hands or wet gloves. Rough handling may cause breakage. Reseal outer carton to protect remaining packets.

To prepare the spray mixture, remove the outer foil pouch and drop the required number of unopened, clear water-soluble packets, as determined under **Applications**, into the spray tank while filling with water to the desired level. Operate the agitator while mixing. Depending on water temperature and amount of agitation, the packets should completely dissolve within a few minutes after they are added to the water. Allow longer time for the clear packet to dissolve when using cooler water.

Do not use Quali-Pro Imidacloprid 75 WSB packets in a tank mix with products that contain boron or release free chlorine. The resultant reaction of PVA and boron or free chlorine is a plastic which is not soluble in water or solvents such as diesel oils, kerosene, gasoline, or alcohol. Do not attempt to use the packets directly in diesel oils or summer spray-type oils as in ULV or LV uses. PVA packets are water soluble, not oil soluble. Use of chlorinated water is acceptable.

Quali-Pro Imidacloprid 75 WSB 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.

Restrictions

Do not apply through any irrigation system.

Do not graze treated areas or use clippings from treated areas for feed or forage. Do not allow runoff or puddling of irrigation water following application. Keep children and pets off treated area until dry. Do not apply Quali-Pro Imidacloprid 75 WSB to areas which are waterlogged or saturated or frozen which will not allow penetration into the root zone of the plant. Do not apply more than 8.6 oz. (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 must be observed.

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

TURFGRASS

Quali-Pro Imidacloprid 75 WSB can be used as directed on turfgrass in sites such as home lawns, business and office complexes, shopping centers, residential complexes, golf courses, airports, cemeteries, parks, playgrounds, athletic fields, and sod farms to control soil-inhabiting pests as listed in the table below.

Effective control can be achieved when applications are made before or during the egg-laying period. The timing of applications can be based on historical monitoring of the site, previous records or experiences, current season adult trapping, or other methods. For best control, apply prior to egg hatch of the target pests followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

Irrigation or rainfall must occur within 24 hours after application to move the active ingredient through the thatch. Do not make applications when turfgrass areas are waterlogged or the soil is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist. The area to be treated must be able to accept vertical penetration of rainfall or irrigation water. Do not mow turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.

Do not apply more than 8.6 oz. (0.4 lb. of active ingredient) per acre per year.

Application Instructions

Apply Quali-Pro Imidacloprid 75 WSB 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.

Consult your local State Agricultural Experiment Station or State Extension Turf Specialists for more specific information regarding timing of application.

APPLICATIONS ON TURFGRASS		
PEST	USE DIRECTIONS	RATE
Larvae of: European crane fly, (<i>Tipula paludosa</i>) Annual bluegrass weevil, (<i>Hyperodes</i> spp.) Green June beetle, (<i>Cotinis nitida</i>) May or June beetle, (<i>Phyllophaga</i> spp.) Asiatic garden beetle, (<i>Maladera castanea</i>) Japanese beetle, (<i>Popillia japonica</i>) Billbug, (<i>Sphenophorus</i> spp.) Northern masked chafer and Southern masked chafer, (<i>Cyclocephala borealis</i> , <i>C. immaculata</i> , and/or <i>C. lurida</i>) Black turfgrass ataenius, (<i>Ataenius spretulus</i> and <i>Aphodius</i> spp.) Oriental beetle, (<i>Anomala orientalis</i>) Cutworms (suppression), (<i>Phyllophaga</i> spp.) European chafer, (<i>Rhizotrogus majalis</i>)	For best results, for the control of grubs, billbugs, European crane fly, and annual bluegrass weevil, make application prior to egg hatch of the target pest. Refer to Application Instructions section of the label.	1.6 oz. (1 packet) per 8250 to 11,000 sq. ft.
Chinch bug (suppression) Mole crickets, (<i>Scapteriscus</i> spp.)	For suppression of chinch bugs, make application prior to hatching of the instar nymphs. For control of mole crickets, make application prior to or during the peak egg-hatch period. When adults or large nymphs are present and actively tunneling, application should be accompanied by a curative insecticide. Follow label instructions for other insecticides when tank mixing.	1.6 oz. (1 packet) per 8250 sq. ft.

ORNAMENTALS

Quali-Pro Imidacloprid 75 WSB is for use on ornamentals in commercial and residential landscapes and interior plantscapes.

Foliar Applications

Quali-Pro Imidacloprid 75 WSB mixes with water and may be used in a variety of application equipment. Mix product with the required amount of water and apply as directed for 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 must be used on the area sprayed, as would be used in a dilute application.

Application Instructions

Quali-Pro Imidacloprid 75 WSB is a systemic product and will be translocated upward into the plant system from root uptake. Place the product 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 translocated 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 8.6 oz (0.4 lb. of active ingredient) per acre per year.

Ant Management Programs

Use Quali-Pro Imidacloprid 75 WSB to control aphids, scale insects, mealybugs, and other sucking pests on ornamentals to limit the honeydew available as a food source for ant populations. Quali-Pro Imidacloprid 75 WSB applications can then be supplemented with residual sprays, bait placements, or other ant control tactics to further reduce the pest population.

APPLICATIONS		
Trees, Shrubs, Evergreens, Flowers, Foliage Plants, Ground Covers, and Interior Plantscapes		
For use only in industrial and commercial buildings and on residential areas.		
PEST	RATE	INSTRUCTIONS
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	1.6 oz. (1 packet) per 300 gals. of water	Foliar Applications: Start treatments prior to establishment of high pest populations and reapply on an as-needed basis.
White grub larvae (such as Japanese beetle larvae, Chafer, <i>Phyllophaga</i> spp., Asiatic garden beetle, Oriental beetle)	1.6 oz. (1 packet) per 8250 to 11,000 sq. ft.	Broadcast Applications: Mix required amount of product in sufficient water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of water per 1000 sq. ft. Irrigate thoroughly to incorporate Quali-Pro Imidacloprid 75 WSB into the upper soil profile. Refer to FLOWERS and GROUND COVERS for additional use directions.

APPLICATIONS		
Trees, Shrubs, Flowers, and Ground Covers		
For use only in industrial and commercial buildings and on residential areas and state, national, and private wooded and forested areas to control the insect pests listed below.		
PEST	CROP/RATE	INSTRUCTIONS
Adelgids Aphids Armored scales (suppression) Black vine weevil larvae Eucalyptus longhorned borer Flatheaded borers (including bronze birch borer and alder borer) Japanese beetles Lace bugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Leafminers Mealybugs Pine tip moth larvae Royal palm bugs Sawfly larvae Soft scales Thrips (suppression) White grub larvae Whiteflies	TREES 1.6 oz. (1 packet) per 24 to 48 inches of cumulative trunk diameter	Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. Keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per tree. SOIL INJECTION¹: For application to trees - Grid System: Holes must be spaced on 2.5-foot centers in a grid pattern extending to the drip line of the tree. Circle System: Apply in holes evenly spaced in circles (use more than one circle dependent upon the size of the tree) beneath the drip line of the tree extending in from that line. Basal System: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base. For application to shrubs - Apply to individual plants using dosage indicated.
	SHRUBS 1.6 oz. (1 packet) per 24 to 48 inches of cumulative shrub height	SOIL DRENCH: Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone. For Control of Specified Borers: Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing pest damage and tree stress.
	FLOWERS & GROUND COVERS 1.6 oz. (1 packet) per 8250 to 11,000 sq. ft.	Apply as a broadcast treatment and incorporate into the soil before planting or apply after plants are established. If application is made to established plants, irrigate thoroughly after application.
¹ No Soil-Injection Applications Allowed in Nassau or Suffolk Counties of New York.		

APPLICATIONS For use only on residential areas.			
CROP	PEST	RATE	INSTRUCTIONS
POME FRUIT: Apple, Crabapple, Loquat, Mayhaw, Pear, Pear (Oriental), Quince	Aphids (except Woolly apple aphid) Leafhoppers (including glassy-winged sharpshooter) Leafminer Mealybugs ² San Jose scale ²	1.6 oz. (1 packet) per 300 gals. of water (2.1 oz. per acre ¹)	<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 control will result from the earliest possible application. For second and succeeding generations, best 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. Quali-Pro Imidacloprid 75 WSB 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 Quali-Pro Imidacloprid 75 WSB while most leafhoppers are in the nymphal stage.</p> <p>For optimal control of mealybug, ensure good spray coverage of the trunk and scaffolding limbs or other resting sites.</p> <p>Do not apply more than 2.1 oz. 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>
Pecan ³	Yellow pecan aphid Blackmargined aphid Pecan leaf phylloxera Pecan spittlebug Pecan stem phylloxera	1.6 oz. (1 packet) per 300 gals. of water (2.1 oz. per acre ¹)	<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 re-treat 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 6.3 oz. of Quali-Pro Imidacloprid 75 WSB per acre per year. Do not make more than 3 applications. Allow 10 or more days between applications.</p>
<p>¹ The amount of Quali-Pro Imidacloprid 75 WSB 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.</p> <p>² Not for use in California for control on pears.</p> <p>³ Use on pecans not permitted in California unless directed by specific supplemental labeling.</p>			

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APPLICATIONS			
For use only in industrial and commercial buildings and on residential areas.			
CROP	PEST	RATE	INSTRUCTIONS
Grapes	Leafhoppers (including glassy-winged sharpshooter) Mealybugs	1.6 oz. (1 packet) per 300 gals. of water (1.0 oz. per acre)	Apply specified dosage as a foliar spray using 200 gallons of water per acre. Do not apply more than a total of 2.0 oz. of Quali-Pro Imidacloprid 75 WSB per acre per year. Allow at least 14 days between applications. Applications may be applied up to and including day of harvest.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area. Do not store below freezing (32°F). Exposure to moisture or excessive handling of water-soluble packets may cause breakage. Store water-soluble packets in original container and out of reach of children, preferably in a locked storage area.

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: Nonrefillable Container (flexible-bag-all weights): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid-fifty lbs. or less): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Handle and open container carefully. Do not cut water-soluble packets when opening. If container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to **PRECAUTIONARY STATEMENTS** on label for hazards associated with the handling of this material. Do not walk through spilled material. Dispose of pesticide as directed above. In spill or leak incidents, keep unauthorized people away.

LIMITATION OF WARRANTY AND LIABILITY

Read the entire directions for use, conditions 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, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Makhteshim Agan of North America, Inc. All such risks shall be assumed by the user or buyer.

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Quali-Pro is a registered trademark of Makhteshim Agan of North America, Inc.

Merit is a registered trademark of Bayer.

QUALI-PRO

Imidacloprid 75 WSB

Insecticide in Water-Soluble Packets

For foliar and systemic insect control in turfgrass (including sod farms), landscape ornamentals, fruit and nut trees, and interior plantscapes.

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine **% BY WT.** 75.0%

OTHER INGREDIENTS: 25.0%

TOTAL: 100.0%

Do not remove packets from container except for immediate use.

Keep water-soluble packets in this container and store in a cool, dry place but not below freezing (32° F).

Contains imidacloprid, the active ingredient in MERIT 75 WSP. Quali-Pro Imidacloprid 75 WSB is not manufactured or distributed by Bayer.

EPA Reg. No. 66222-199

EPA Est. No. 39578-TX-001

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of 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 eye open and rinse slowly and gently with water for 15 to 20 minutes.• Remove contact lenses, if present, after the first 5 minutes; then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact Prosar at 1-877-250-9291 for emergency medical treatment information	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

For additional precautionary, handling, and use statements, see inside of this booklet.

Manufactured for:

Makhteshim Agan of North America, Inc.

4515 Falls of Neuse Rd., Suite 300 • Raleigh, NC 27609

Net Contents: 6.4 Ounces (4 x 1.6 Ounce Water-Soluble Packets)

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