

66222-200

6/23/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Jennifer Yentel
Mahkteshim Agan of North America, Inc.
4515 Falls of Neuse Rd., Suite 300
Raleigh, NC 27609

JUN 23 2011

Dear Ms. Yentel:

Subject: Revised Basic CSF; New Alternate CSF
Quali-Pro Imidacloprid 0.5G Insecticide
EPA Registration No. 66222-200
Submission Date: January 31, 2011

The Agency has reviewed your submission for the revised basic and new alternate Confidential Statements of Formula, and the following comments apply:

The Confidential Statement of Formula dated June 6, 2011 for the basic formulation agrees with the label claim in compliance with PR Notice 91-2 and is acceptable. The revised CSF will replace the previously accepted CSF dated July 6, 2009. The Confidential Statement of Formula has been added to your file as part of the record.

The Confidential Statement of Formula dated June 6, 2011 for the alternate formulation (alternate #1) agrees with the label claim in compliance with PR Notice 91-2 and is acceptable. The Confidential Statement of Formula has been added to your file as part of the record.

Within 18 months of this letter, submit the results of studies for the 830-6317 (one year storage stability) and 830.6320 (corrosion characteristics) studies. For these studies it is recommended that the observations be made at 0, 3, 6, 9, and 12 month intervals.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment.

Enclosed are the product chemistry, acute toxicity, and efficacy reviews. If you have any questions concerning this letter, please contact Jennifer Urbanski at (703) 347-0156 or urbanski.jennifer@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Hebert".
John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

2086

QUALI-PRO[®]

Quality Turf & Ornamental Products

IMIDACLOPRID 0.5G INSECTICIDE

For systemic insect control in turfgrass and landscape ornamentals.

Contains imidacloprid, the active ingredient in MERIT[®] 0.5 G INSECTICIDE.

Quali-Pro Imidacloprid 0.5G is not manufactured or distributed by Bayer.

Optional marketing language in brackets:

[large picture of a grub on the label]

[Include a picture of the grub life cycle]

[10 Pounds Treats 7000 Sq Ft]

[Controls Billbugs, Green June Beetles and Mole Crickets]

[Apply Once A Year]

[1 Application Provides Season Long Control]

[Apply anytime between Spring throughout Summer]

[Kills Grubs all Season long]

[For Control of Grubs and Listed Insects]

[Include a picture of any listed insects]

ACTIVE INGREDIENT:

% BY WT.

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N- nitro-2-imidazolidinimine..... 0.5%

OTHER INGREDIENTS: 99.5%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

Manufactured for:

Makhteshim Agan of North America, Inc.

4515 Falls of Neuse Rd, Suite 300

Raleigh NC 27609

EPA Reg. No. 66222-200

EPA Est No. [REDACTED]

NET CONTENTS: ____ LBS

FIRST AID	
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.
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.
Have a product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency, contact Prosar at 1-877-250-9291.	
NOTE TO PHYSICIAN: No specific antidote is available. Treat the patient symptomatically.	

ACCEPTED

JUN 23 2011

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

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EPA. Reg. No: 66222-200

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear long sleeved shirt and long pants, shoes and socks.

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. As soon as possible, wash thoroughly and change into clean clothing. If wearing gloves, wash the outside of gloves before removing.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

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

DIRECTIONS FOR USE

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

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

RESTRICTIONS: Not for use in commercial greenhouses, nurseries, on sod farms, or on grass grown for seed. For use on plants intended for aesthetic purposes or climatic modification and being grown in interior plantscapes, ornamental gardens or parks, or on golf courses or lawns and grounds.

TURFGRASS

Quali-Pro® Imidacloprid 0.5G is for use on turfgrass in home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, and athletic fields to control soil-inhabiting pests as listed in the table below. Quali-Pro Imidacloprid 0.5G can also be used for the suppression of cutworms and chinchbugs in turfgrass areas.

Application Instructions

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.

RESTRICTIONS: Follow treatment by rainfall or irrigation 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 80 lb (0.4 lb of active ingredient) per acre per year.

Application Equipment

Apply Quali-Pro Imidacloprid 0.5G uniformly over the area being treated with granular application equipment. Both drop-type and rotary-type spreaders may be used. Do not use spreaders which apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately.

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

APPLICATIONS OF QUALI-PRO IMIDACLOPRID 0.5G 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>Spherophorus</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) European chafer (<i>Rhizotroqus majalis</i>)	For optimum control of grubs, billbugs, european crane fly, and annual bluegrass weevil, make application prior to egg hatch of the target pest.	60 to 80 lb per acre or 1.2 to 1.8 lb per 1000 sq ft
Chinchbug (suppression) Mole Crickets (<i>Scapteriscus</i> spp.)	For suppression of chinchbugs, 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.	80 lb per acre or 1.8 lb per 1000 sq ft

ORNAMENTALS

Quali-Pro Imidacloprid 0.5G can be used as a broadcast application on ornamentals in commercial and residential landscapes.

Application Instructions

Quali-Pro Imidacloprid 0.5G is a systemic product which is translocated upward within the plant system. Follow applications with sufficient mechanical incorporation, irrigation, or rainfall to move the active ingredient into the soil. Irrigate within 24 hours after application if rainfall has not occurred. Apply prior to pest infestation to achieve optimum control.

Apply as a broadcast treatment. Prior to application, remove black plastic or other weed barrier material that will not permit water permeability.

NOTES: Do not allow runoff or puddling of irrigation water following application. Do not apply Quali-Pro Imidacloprid 0.5G 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 80 lb (0.4 lb of active ingredient) per acre per year.

Application Equipment

Apply Quali-Pro Imidacloprid 0.5G uniformly over the area being treated with granular application equipment. Both drop-type and rotary-type spreaders may be used to apply Quali-Pro Imidacloprid 0.5G. Do not use the type of spreaders which would apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately.

APPLICATION OF QUALI-PRO IMIDACLOPRID 0.5G ON ORNAMENTALS

For use only in and around industrial and commercial buildings and residential areas.

CROP	PEST	RATE
Landscape Plantings (including trees, shrubs, evergreens, flowers, foliage plants, and ground covers)	White grub larvae (such as Japanese beetle larvae, Chafers, <i>Phyllophaga</i> spp., Asiatic garden beetle, Oriental beetle)	1.4 to 1.8 lb per 1000 sq ft

Spreader Settings

The following chart can be used as a guide in establishing an accurate rate of Quali-Pro Imidacloprid 0.5G. Application rates will vary depending upon speed, equipment wear, and condition of spreader. Carefully calibrate application equipment prior to commercial use of this product.

SPREADER	SPEED (mph)	SETTINGS	
		60 lb/acre	80 lb/acre
Cyclone Model CB4000	3	3 ¼	3 ½
Earthway Drop	3	9	10
Earthway 10' Rotary	3	11	12
GandyTurf Tender 24"	3	16	19
GandyTurf Tender 42"	3	21	23
Lely	4.5	3.5	-
Lesco Model 6000	3	B ½	C
PSB Prizelawn CBR-II	3	3 ¼	3 ½
Scott's Proturf R-8A	3	H	I
Scott's Proturf SR-1	3	H	I
Scott's PF-1, PF-2, PF-3, PF-4 Drop	3	4	4 ½
Scott's SS-1 Drop	3	4	4 ½
Spyker Model 34	3	3.1	3.2
Vicon Model PS-203	4.5	13	16

RESTRICTIONS

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.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in 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.

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

CONTAINER HANDLING:

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. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid-greater than fifty lbs): 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. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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

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.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Makhteshim Agan of North America, 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 Makhteshim Agan of North America, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Makhteshim Agan of North America, Inc. disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Makhteshim Agan of North America, Inc.'s election, the replacement of product.

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

Merit is a registered trademark of Bayer.