



U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 23, 2005

Mr. Premjit P. Halarnkar, Ph.D., MPA
Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105-2633

Subject: Label Amendment - Add Use on Tobacco
Celero™ 16 WSG Insecticide
EPA Registration No. 66330-52
Your Submission Dated February 20, 2005

Dear Dr. Halarnkar:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provisions:

Personal Protective Equipment section:

1. Insert the acronym "(PVC)" immediately following the words "polyvinyl chloride."

Environmental Hazards section:

2. Insert the following text as a 2nd sentence in paragraph 1 of this section: "Do not apply when weather conditions favor drift from treated areas."
3. At the end of the 1st paragraph, insert the words "or rinsate" immediately following the word "washwaters."
4. In the 1st sentence of paragraph 2, replace the words "exposed at treatment" with the words "exposed to treatment."

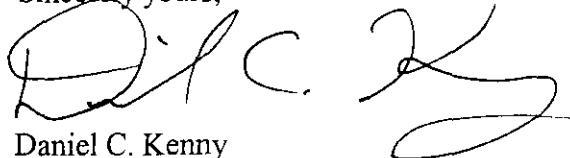
Agricultural Use Requirements section:

5. At the end of this text box, delete the existing statement "chemical-resistant gloves made of waterproof material" and replace with "chemical-resistant gloves made of any waterproof material."

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A stamped copy is attached for your records. Please submit one (1) final printed copy of the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding the label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'D.C. 25', written over a horizontal line.

Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Attachment

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CELERO™ 16 WSG

INSECTICIDE

GROUP 4A INSECTICIDE

FOR USE ON ORNAMENTALS AND TOBACCO

INGREDIENTS	By wt.
Active Ingredient	
*Clothianidin.....	16.0%
Other Ingredients.....	84.0%
Total.....	100.0%
*(E)-1-(2-chloro-1,3-thiazol-5-ylmethyl)-3-methyl-2-nitroguanidine.	

ACCEPTED
with COMMENTS
In EPA Letter Dated:

KEEP OUT OF REACH OF CHILDREN

CAUTION

FEB. 23, 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
66330-52.

See back panel for additional precautionary statements.

Arvesta Corporation
100 First Street, Suite 1700
San Francisco, CA 94105

EPA Registration No. 66330-52
EPA Est. No. _____

NET WEIGHT _____ OUNCES

FIRST AID	
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• Call 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	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment

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	advice.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL 1-800-228-5635 Ext. 174 FOR 24-HOUR CHEMICAL EMERGENCY (Spill, Leak, Fire or Accident) ASSISTANCE: CALL CHEMTREC 1-800-424-9300	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instruction for category A on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride. Follow the manufacturer's instructions for cleaning/maintaining PPE. If no instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS

When handlers use closed systems or enclosed cabs 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.

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.

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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.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply where runoff is likely to occur. 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 cleaning equipment or disposing of equipment washwaters.

This product is toxic to bees exposed at treatment and for more than 5 days following treatment. Do not apply this product to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period, unless the application is made in response to a public health emergency declared by appropriate state or federal authorities.

DRIFT MANAGEMENT

Do not allow this product to drift onto neighboring crops or non-crop areas or use in a manner or at a time other than in accordance with label directions because animal, plant or crop injury, illegal residues or other undesirable results may occur.

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator is responsible for considering all these factors when making decisions. Where states have more stringent regulations, they should be observed.

DIRECTIONS FOR USE

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

Carefully read and understand the Directions for Use and restrictions before applying this product.

Do not apply this product in any 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

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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 on this label about personal protective equipment (PPE), notification to workers 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 entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry into 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, socks, shoes, chemical-resistant gloves made of waterproof material.

GENERAL INFORMATION

CELERO 16 WSG is an insecticide for broad spectrum control of Aphids, Whiteflies and Mealybugs infesting ornamentals and Fleabeetles and Aphids infesting tobacco. When applied as directed, CELERO 16 WSG provides excellent and long residual control of the above listed insects.

NOTICE TO USER

Plant tolerance to this product has been found to be acceptable in research trials for the general plant species listed on the label. However, due to the large number of species and their associated varieties or cultivars, and due to variable growing conditions, it is impossible to test every plant and variety or cultivar for tolerance to this product. Neither the Manufacturer nor the Seller has determined whether or not this product can be safely used on all cultivars. The user should determine if this product can be used safely prior to commercial use. In a smaller test area, test the recommended rates on plants for phytotoxicity prior to general use.

RESISTANCE MANAGEMENT

Certain insects have demonstrated a propensity to develop resistance to insect control products. For these insects avoid treating consecutive generations with the same product or products from the same class. CELERO 16 WSG is one member of the neonicotinoid insecticides and should be rotated with products that belong to different classes. Always consult with your local agricultural specialist for guidance and information on area resistance management programs. In the absence of a locally coordinated program, the following IPM strategy will help to ensure the prolonged usefulness of CELERO 16 WSG and conventional insecticides. In order to reduce selection pressure, which can lead to the development of resistance, the following strategies are recommended.

1. Incorporate IPM techniques into your insect control program.
2. Ensure thorough spray coverage of all foliage.

3. Always apply CELERO 16 WSG at the recommended rates (Don't use less than labeled rates of any insect control product when applied alone or in tank mixtures.) and apply at the proper timing according to label recommendations.
4. Use CELERO 16 WSG in alternation with other insecticides having different modes of action.

PLANT TOLERANCE

Neither the manufacturer nor the seller has determined whether or not CELERO 16 WSG can be used safely on all cultivars. CELERO 16 WSG has been tested on some cultivars with no phytotoxicity observed at label rates. Since all plant species and their varieties and cultivars have not been tested for tolerance, it is recommended that a small number of plants be sprayed to make certain that no phytotoxicity occurs, prior to any large scale application to plants. The end user assumes all risks arising from application of CELERO 16 WSG in a manner inconsistent with its labeling.

COMPATIBILITY OF MIXTURES

To obtain broad-spectrum pest control, CELERO 16 WSG can be tank-mixed with other pesticides. However, all plant species and their varieties and cultivars have not been tested with possible tank mix combinations, sequential pesticide treatments and adjuvants and surfactants. The user should conduct a spray mix compatibility and phytotoxicity trial under local conditions to ensure compatibility prior to any large-scale use.

PREPARATION OF SPRAY SOLUTION

Begin with clean equipment. Add sufficient clean water to the spray tank for one-half of the mix load. Start tank agitation. Add and properly suspend the necessary amount of CELERO 16 WSG before adding any other products. Agitate to ensure thorough mixing while adding the remaining required water. A high quality wetting agent or other spray adjuvant, approved for use on your crop, may be added to spray solutions according to the manufacturer's use instructions. CELERO 16 WSG should be properly suspended and diluted prior to the addition of any adjuvant. Consult the adjuvant label or manufacturer for crop tolerance and safety information when used with this product. Maintain agitation during mixing and application. DO NOT allow the spray mixture to stand without agitation. Apply with properly calibrated spray equipment. If agitation is stopped for any reason, the spray solution must be thoroughly re-mixed prior to any further use.

ORNAMENTALS

CELERO 16 WSG should be applied when threshold populations are observed. Do not wait until large insect populations have been established. Apply CELERO 16 WSG in sufficient water to ensure uniform and thorough coverage of foliage. Thorough coverage is required for optimum control. To achieve adequate coverage, use proper spray pressures, nozzles, nozzle spacing, and water volume per acre.

Apply at planting or after planting to established plants. For optimum control on established plants, irrigate the treated area thoroughly but do not allow leaching and runoff from containers for at least 10 days.

Do not apply more than a total of 40 oz of CELERO 16 WSG (0.4 lbs active ingredient) per acre per season.

Choose lower rates for light infestations and/or smaller plants and higher rates for heavy infestations and/or larger plants.

FOLIAR APPLICATION		
USE PATTERN	PEST	DOSAGE (OZ/100 GALLONS OF WATER)
Trees (including non-bearing fruit and nut) Shrubs Evergreens Flowers Foliage plants Ground covers Interior landscapes	Aphids	2 - 4
	Whiteflies Mealybugs	3 - 4

DRENCH APPLICATION*					
USE PATTERN	PEST	DOSAGE (OZ)	CONTAINER SIZE (INCHES)	NO. POTS	
Plants in containers	Herbaceous species (one or two plants per pot)	Aphids	2 - 4	2	6000
				3	4000
				4	3000
				5	2400
				6	2000
				7	1700
	Whiteflies Mealybugs	3 - 4		8	1500
				9	1350
				10	1200
				11	1100
				12	1000
	Woody perennials	Aphids	2 - 4	2	4000
				3	2680
				4	2000
				5	1600
				6	1320
				7	1120
	Whiteflies Mealybugs	3 - 4		8	1000
				9	880

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				10	800		
				11	720		
				12	640		
		Aphids	2 – 4	2	4000		
				3	2680		
				4	2000		
	Herbaceous species (three or more plants per pot)	Whiteflies Mealybugs	3 – 4	5	1600		
				6	1320		
				7	1120		
				8	1000		
				9	880		
				10	800		
				11	720		
				12	640		
Ornamental plants grown in flats, benches, or beds				Aphids	2 – 4 oz per 7500 square feet		
				Whiteflies Mealybugs	3 – 4 oz per 7500 square feet		

*The specified amount of product should be mixed with a sufficient volume of water to evenly disperse the solution into the pots and to thoroughly wet the planting medium, without resulting in overflow or leaching and the loss of product. When watering treated pots, avoid watering to the point of overflowing or leaching for 10 days after application.

TOBACCO (SOIL APPLICATION)

CELERO 16 WSG must be mixed with water prior to application. Keep the CELERO 16 WSG solution agitated or mix regularly to avoid settling in the spray or transplant tank. Apply CELERO 16 WSG at the specified dosage to the soil in transplant water or by drench to trays or flats prior to transplanting. Plants in flats or trays should be watered by overhead irrigation to wash CELERO 16 WSG from the foliage into the potting media. Failure to wash CELERO 16 WSG from foliage may result in a reduction of control.

RECOMMENDED APPLICATION RATES

SOIL APPLICATION: in transplant water application or tray or flat drench application	
PEST	APPLICATION RATE
Fleabeetles	5 to 10 oz of product per acre (0.8-1.6 oz ai/A)
Aphids	10 oz of product per acre (1.6 oz ai/A)
SPECIAL INSTRUCTIONS AND LIMITATIONS	
<ul style="list-style-type: none"> Soil applications may sometimes cause yellowing on the leaves present at the time of transplanting. This effect does not have any impact on plant growth and yields. Do not apply more than a total of 0.2 lb active ingredient of CELERO 16 WSG per acre per season. 	

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a dry place away from excessive heat. Do not store near food or feed. Store in original container only. To close package, replace and tighten cap to form an airtight seal.

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: Triple rinse (or equivalent), 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.

CONDITIONS OF SALE

1. Arvesta Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the Directions for Use under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Arvesta. **ARVESTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. ARVESTA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
3. Critical and unforeseeable factors beyond Arvesta's control prevent Arvesta from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the use stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liabilities resulting from handling, storage, and use of this product.

CELERO is a trademark of Arvesta Corporation.