

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

JUL 1 4 2009

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Timothy M. Formella United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406

Subject: Revision of Storage and Disposal Statements

Dear Mr. Formella:

The Agency is in receipt of your Application(s) for Pesticide Notification under

Pesticide Registration Notice (s) (PRN) 2007-4 dated June 19, 2009 for:

EPA Registration Number 70506-122 EPA Registration Number 70506-142 **EPA Registration Number 70506-143**

UPI Imidacloprid Technical Insecticide

ImiGold 0.5 G Turf, Ornamental, and Termiticide/Insecticide

ImiBloc 0.5 G Termiticide/Insecticide

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and find that the label change(s) requested falls within the scope of PRN 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, at 703 305-5409 or electronically at daniel.dani@epa.gov

Dani Daniel Registration Division (7505P) Insecticide/Rodenticide Branch

NOTIFIC/ ION

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| Please read instructions on reverse befo | re completing form. | | Form Approve | a, OMB No. 2070- | 0060, Approval expires 05-31-98 | |
|---|--|---|--|---|--|--|
| Ω EDΛ | United States | | " 🖺 Registi | ration | OPP Identifier Number | |
| EPA Env | ronmental Protect | ion Agency | ☐ Amend | iment | | |
| | Washington, DC 20 | 0460 | <u></u> | | | |
| | Annlicat | ion for Per | | n I | | |
| Company/Product Number | Applicat | | | - | Proposed Classification | |
| 70506-122 | | Dani Dan | Product Manager niel | | | |
| Company/Product (Name) UPI Imidacloprid Technical Insecticide | | PM# | 1 | | None Restricted | |
| 5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 | | (b)(l), n to: | 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. | | | |
| Check if this is a new address | | Product 1 | Product Name | | | |
| | | Section | on - II | | | |
| Amendment – Explain below. | | | Final printed lat | oels in response to | Agency letter dated | |
| Resubmission in response to A | gency letter dated | | Me Too" Applic | | | |
| Notification - Explain below. | | | Other - Explain | below | | |
| Notification of label change per PF requirements of EPA's regulations the labeling or the Confidential Stamake any false statement to EPA. 156.10, 156.140, 156.144, 156.144 and penalties under sections 12 and penalties. | at 40 CFR §§ 156.10, tement of Formula for t I further understand th 5, and 156.156, this pro | 156.140, 156. this product. I aat if the amer | 144, 156.146, and 1 I understand that it i nded label is not con | I56.156. No oth s a violation of 1 sistent with the | er changes have been made to 8 U.S.C. Sec. 1001 to willfully requirements of 40 CFR §§ | |
| | | Sectio | n - III | | | |
| Material This Product Will Be Page | | |) | 1 | 0.7 | |
| Child-Resistant Packaging Yes* | Unit Packaging Yes | | Water Soluble Packaging Yes | | Type of Container Metal | |
| No res | ⊠ No | | ☐ Fes No | | Plastic | |
| Z 100 | If "Yes" | No. per | If "Yes" | No. per | Glass | |
| *Certification must | Unit Packaging wgt. | container | Package wgt. | container | Paper | |
| be submitted | | 1 | | | Other | |
| Location of Net Contents Information | tion 4. Size(s |) Retail Contain | ner | 5. Location o | f Label Directions | |
| 1 K (| tainer | , | | | I | |
| | 200 and 2 | 225 kg fiber drui | ms | On labeli | ing accompanying product | |
| Manner in Which Label is Affixed | = | graph er glued cìled | Other: | | - | |
| | | Sectio | n - IV | | ر در و ر. رود و | |
| Contact Point (Complete items dia | rectly below for identificati | on of individual | to be contacted, if nec | | | |
| Timothy M. Formella Senior Registration Manager Code) | | | | | | |
| I certify that the statements I have n acknowledge that any knowingly falsunder applicable law. 2. Sighature | Certifical nade on this form and all a se or misleading statemen | attachments the at may be punished. 3. Title | ereto are true, accurate hable by fine or impriso | onment or both | 6. ΒátèºΑβρlication Received ° (Stamped) | |
| 4. Typed Name Timothy M. Formella | | <u> </u> | Date Jane 19, 2009 | | 3333 | |

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

| PROPOSED LABEL | | | | | | |
|--------------------|-----------------------|---------------------------|--|--|--|--|
| EPA Registration # | Date Submitted to EPA | Electronic file name | | | | |
| 70506- 122 | 6/19/2009 | 070506-00122.20090619.pdf | | | | |

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

| Simothy m. Jornella | 06/19/2009 |
|-----------------------------|------------|
| Signature | Date |
| Timothy M. Formella | |
| Name (typed) | |
| Senior Registration Manager | |
| Title | |



United Phosphorus, Inc.

VIA: United Parcel Service

630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 (610) 491-2813 (phone) (610) 491-2810 (fax)

June 19, 2009

Document Processing Desk (NOTIF)
Linda Arrington
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Notification Regarding PR Notices 2007-4 and 2001-5

| UPI Imidacloprid Technical Insecticide | EPA Reg. No. 70506-122 |
|---|------------------------|
| ImiGold 0.5 G Turf, Ornamental, and Termiticide/Insecticide | EPA Reg. No. 70506-142 |
| ImiBloc 0.5 G Termiticide/Insecticide | EPA Reg. No. 70506-143 |
| ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide | EPA Reg. No. 70506-150 |
| Imidacloprid 2 F MUP Insecticide | EPA Reg. No. 70506-151 |
| Aura 2 F Insecticide | EPA Reg. No. 70506-152 |
| Imidacloprid 70 DF Agricultural Insecticide | EPA Reg. No. 70506-153 |
| Fist 1.6 F Insecticide | EPA Reg. No. 70506-154 |
| ImidaMax 4 F Insecticide | EPA Reg. No. 70506-155 |
| ImiGold 70 DF Turf and Ornamental Insecticide | EPA Reg. No. 70506-156 |
| ImiGold 70 DF Turf, Ornamental, and Greenhouse Insecticide | EPA Reg. No. 70506-157 |
| ImiBloc 70 DF Termiticide/Insecticide | EPA Reg. No. 70506-158 |
| ImiBloc 4 F Termiticide/Insecticide | EPA Reg. No. 70506-168 |

Dear Ms. Arrington:

United Phosphorus, Inc. hereby notifies the Agency of our intent to revise the labels for our registered pesticide products containing the active ingredient imidacloprid.

These label notifications include revision of the Storage and Disposal text in order to comply with the requirements of PR Notice 2007-4 regarding Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment." In addition, with the exception of the Technical and MUP product labels (EPA Reg. Nos. 70506-122 and 70506-151, "respectively), the Insecticide Resistance Action Committee (IRAC) mode of action group code has been added to the first page of the labels per the Agency guidance in PR Notice 2001-5. The UPI warranty statements on these labels have been updated as well.

These changes are consistent with the notification provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46. Enclosed please find the following materials for each of the thirteen products to support these registration notifications:

United Phosphorus, Inc. June 19, 2009

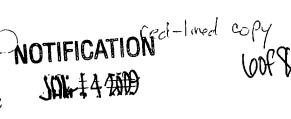
- 1. Completed Application for Pesticide Registration (EPA Form 8570-1)
- 2. A "red-lined" copy of the amended label showing the changes being made
- 3. A clean copy version of the revised label
- 4. CD with the labels in electronic format (file names: 070506-00122.20090619.pdf, 070506-00142.20090619.pdf, 070506-00143.20090619.pdf, 070506-00150.20090619.pdf, 070506-00151.20090619.pdf, 070506-00152.20090619.pdf, 070506-00153.20090619.pdf, 070506-00154.20090619.pdf, 070506-00155.20090619.pdf, 070506-00157.20090619.pdf, 070506-00158.20090619.pdf, and 070506-00168.20090619.pdf)
- 5. Completed Certification with Respect to Label Integrity form

If you have any questions on this submission please call me at 610-491-2813 or email at tim.formella@uniphos.com.

Sincerely,

Timothy M. Formella

Senior Registration Manager



UPI IMIDACLOPRID TECHNICAL INSECTICIDE

For use in the manufacture of insecticides

KEEP OUT OF REACH OF CHILDREN

WARNING

| FIRST AID | | | | |
|---|--|--|--|--|
| 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 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 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, the continue rinsing eye. Call a poison control center or doctor for treatment advice. | | | |
| 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. | | | |
| treatment. Contact the Roc treatment information. | or label with you when calling a poison control center or doctor, or going for ky Mountain Poison Control Center at 1-866-767-5089 for emergency medical | | | |
| NOTE TO PHYSICIAN: | No specific antidote is available. Treat symptomatically. | | | |

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident, call CHEMTREC at 1-800-424-9300

United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 1-800-438-6071 • www.upi-usa.com Net Contents: 50 kg (110 lb) EPA Reg. No. 70506-122

EPA Est. No. Batch/Lot #

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Warning. May be fatal if swallowed. Harmful if inhaled. Wash thoroughly with soap and warm water after handling and before eating, drinking, chewing gum or using tobacco products. Avoid breathing dust. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, and ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

UPI Imidacloprid Technical is intended for formulation into end use products for:

- (1) Terrestrial Non-Food Crop, Residential Outdoor, Commercial Outdoor: Lawns, turfgrass, ornamentals
- (2) Residential and Commercial Indoor (including Greenhouses): Ornamentals
- (3) Terrestrial Food Crops including:

Barley

Head and Stem Brassica Vegetables

Bushberries Canola

Citrus (containerized and field)

Cotton Cranberries

Cucurbits
Fruiting Vegetables

Grapes

Greenhouse Vegetables

Hops

Leafy Petiole Vegetables Leafy Vegetables Legume Vegetables Pecan

Pome Fruits

Potato (including seed piece treatment)

Root Vegetables Strawberries Stone Fruit Sugarbeet Tobacco

Tuberous and Corm Vegetables

Tropical Fruits

Oats Rye Sorghum Wheat

- (4) Uses for which U.S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration; and
- (5) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

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STORAGE AND DISPOSAL

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

Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below. Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. Pesticide Disposal: Pesticides wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA regional Office for guidance.

Container Handling: Nonrefillable container. Do not reuse or refill this container.

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles.

Empty residue into application equipment. Then offer for recycling if available or dispose of liner in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

Warranty Limitations and Disclaimer

United Phosphorus, Inc. (UPI) warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. UPI EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

Deleted: or

Deleted: To Confine Spills:

Deleted: You may contact the Emergency Response Team for decontamination procedures or any other assistance that may be necessary.

Deleted: Disposal

Deleted: Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Rev. 06/19/2009

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