

70506-122

12-09-2009

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

DEC 9 2009

Dear Mr. Formella:

Subject: Labeling Amendment; Addition of Use Sites
UPI Imidacloprid Technical Insecticide
EPA Registration No. 70506-122
Submission Date: November 13, 2009

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

1. Should you wish to retain the company's website on your label, then please be aware that the language presented in the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to the false and misleading provisions of 40 CFR 156.10(a)(5). Therefore should the Agency find or if it is brought to our attention that a website contains claims substantially differing from the EPA approved section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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. If you have any questions regarding this label, please contact me at (703) 306-0415.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

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

Enclosure- Stamped Labeling

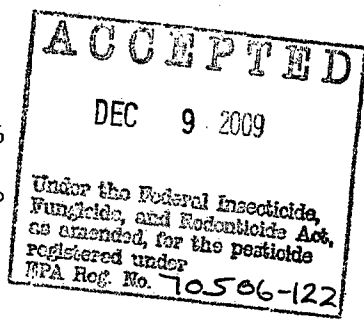
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UPI IMIDACLOPRID TECHNICAL INSECTICIDE

For use in the manufacture of insecticides

ACTIVE INGREDIENT

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2- imidazolidinimine.....	98%
Other Ingredients	2%
Total	100%



KEEP OUT OF REACH OF CHILDREN

WARNING

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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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 mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
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 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 advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Contact the Rocky Mountain Poison Control Center at 1-866-767-5089 for emergency medical treatment information.	
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 # _____

**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 and Commercial Outdoor: lawns, turfgrass, ornamentals around residential or commercial buildings
- (2) Terrestrial Non-Food Crop, Indoor & Outdoor Use: companion animals and poultry houses
- (3) Residential and Commercial Indoor (including Greenhouses): Ornamentals
- (4) Terrestrial Food Crops including:

- | | |
|----------------------------------|---|
| Bananas | Legume Vegetables |
| Barley | Oats |
| Brassica (Cole) Leafy Vegetables | Peanuts |
| Bushberries | Pecans |
| Caneberries | Plantain |
| Canola | Pome Fruit |
| Citrus (containerized and field) | Pomegranate |
| Coffee | Potatoes (including seed piece treatment) |
| Cotton | Root Vegetables |
| Cranberries | Rye |
| Cucurbit Vegetables | edible seed crops for Sorghum |
| Fruiting Vegetables | Stone Fruit |
| Globe Artichokes | Strawberries |
| Grapes | Sugarbeets |
| Greenhouse Vegetables | Tobacco |
| Herbs | Tree Nuts |
| Hops | Tropical Fruit |
| Leafy Green Vegetables | Tuberous and Corm Vegetables |
| Leafy Petiole Vegetables | Wheat |

- (5) UPI Imidacloprid Technical Insecticide is intended for formulation into end use products for the following uses: Above and below ground protection of wood, wood composites, plastics, cables, textiles, geotextiles, and termiticidal wall treatment, from insect infestation.

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Preservatives for Wood and Wood-based Composite Products: UPI Imidacloprid Technical Insecticide is for indoor manufacturing of wood preservatives or preservatives intended for use in wood-based composite products, such as waferboard, fiberboard, particleboard, plywood, and oriented strand board when it is important to prevent the attack of insects, including termites.

Preservatives for Plastic: UPI Imidacloprid Technical Insecticide is for the indoor manufacturing of preservatives intended for use in plastics such as PVC, polyurethane, polyethylene, polypropylene, natural synthetic rubber, and other plastics. These plastics are used in the following applications: boat covers, carpet backing, convertible car tops, flooring, hoses, automotive underbody coatings, pond liners, roofing foils, wall coverings, cable sheeting, film and sheet of agricultural products, and other applications. UPI Imidacloprid Technical Insecticide is labeled for film and sheeting, extruded profiles, plastisols, molded goods, organosols, fabric coatings, and similar systems requiring an effective termiticidal compound.

Textiles: UPI Imidacloprid Technical Insecticide is labeled for use as a termiticide in textiles such as tents and groundsheets, boat and car covers, awnings, tarpaulins, amrine upholstery, seals, felts, and other applications. Formulations must be manufactured indoors.

(6) 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

(7) 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.

Rev. 12/8/2009