



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 18, 2016

Sherry Hutcheson
Regulatory Affairs Manager
United Phosphorus, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Subject: Label Amendment – Listing out the tropical fruits
Product Name: UPI Imidacloprid Technical Insecticide
EPA Registration Number: 70506-122
Application Date: August 15, 2016
Decision Number: 520217

Dear Ms. Hutcheson:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Dee Colby by phone at 703-347-8657, or via email at colby.deanna@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'VE', followed by a horizontal line extending to the right.

Venus Eagle, Product Manager 01
Invertebrate and Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

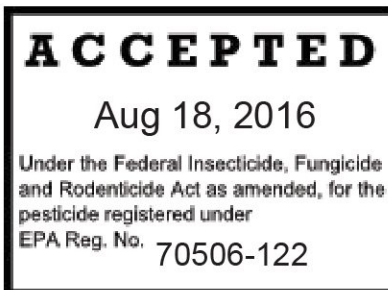
Enclosure: stamped label

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 1-866-673-6671 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: poultry houses
- (3) Residential and Commercial Indoor (including Greenhouses): Ornamentals
- (4) Terrestrial Food Crops including:

Bananas
Barley
Brassica (Cole) Leafy Vegetables
Bushberries
Caneberries
Canola
Citrus (containerized and field)
Coffee
Cotton
Cranberries
Cucurbit Vegetables
Fruiting Vegetables
Globe Artichokes
Grapes
Greenhouse Vegetables
Herbs
Hops
Leafy Green Vegetables
Leafy Petiole Vegetables

Legume Vegetables
Oats
Peanuts
Pecans
Plantain
Pome Fruit
Pomegranate
Potatoes (including seed piece treatment)
Root Vegetables
Rye
edible seed crops for Sorghum
Stone Fruit
Strawberries
Sugarbeets
Tobacco
Tree Nuts
Tropical Fruit (Acerola, Atemoya, Avocado, Biriba, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Jaboticaba, Guava, Llama, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Perisimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu)

(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.

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.

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.