

70506-142
10A-33

04/18/2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

APR 18 2008

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Primary Brand Name "ImiGold 0.5 G Turf, Ornamental, and
Termiticide/Insecticide"
EPA Reg. No. 70506-142
Application Dated March 25, 2008

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 03/25/08 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



EPA

United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other: Notification

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 70506-142	2. EPA Product Manager George LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ImiGold 0.5 G Turf, Ornamental, & Termiticide/Insecticide	PM#	
5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 <input type="checkbox"/> Check if this is a new address	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. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
 Notification of change in Primary Brand Name. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
*Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Including but not limited to 2.0 oz gel per tube		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____		
			<input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Timothy M. Formella	Title Senior Registration Manager	Telephone No. (Include Area Code) 610-491-2813
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete; I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Senior Registration Manager	
4. Typed Name Timothy M. Formella	5. Date March 25, 2008	



United Phosphorus, Inc.

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

March 25, 2008

VIA: UNITED PARCEL SERVICE

Document Processing Desk (NOTIF)
Sherada Hobgood
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 of change in Primary Brand Name
EPA Reg. No. 70506-142**

Dear Ms. Hobgood:

United Phosphorus, Inc. hereby advises the Agency of our intent to change the Primary Brand Name for the following registered insecticide end-use product containing the active ingredient imidacloprid.

<u>EPA Reg. No.</u>	<u>Current Primary Brand Name</u>
70506-142	ImiBloc 0.5 G Turf, Ornamental, and Termiticide/Insecticide
	<u>New Primary Brand Name</u>
	ImiGold 0.5 G Turf, Ornamental, and Termiticide/Insecticide

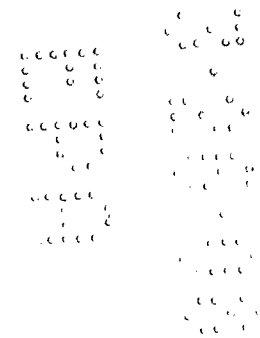
This change is consistent with the notification provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46. Enclosed please find the following materials to support this registration notification:

1. Completed Application for Pesticide Registration (EPA Form 8570-1)
2. One copy of the amended label reflecting the new primary brand name

If you have any questions on this submission please call me at 610-491-2813.

Sincerely,

Timothy M. Formella
Senior registration Manager



IMIGOLD 0.5 G

Turf, Ornamental, and Termiticide/Insecticide

For systemic insect control in turfgrass and landscape ornamentals

ALSO

For pest management professionals use, to kill worker termites and reproductive forms of termites (*Coptotermes, Heterotermes, Reticulitermes, Zootermopsis*) present at the time of application only. Does not provide structural protection or substitute for mechanical alteration, soil or foundation treatment with termiticide. Do not use as sole protection against termites, as this product will not prevent future infestations. A professional inspection is recommended.

ACTIVE INGREDIENT

Imidacloprid – 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....	0.5%
Other Ingredients	99.5%
Total	100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

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 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.
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.
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 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

Contents:
EPA Reg. No. 70506-142
EPA Est. No.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Caution. Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water, 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 ground water. 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.

TURF & ORNAMENTAL APPLICATIONS INFORMATION

Use Precautions

- Do not apply more than 80 lbs ImiGold 0.5 G Insecticide (0.4 lb ai) per acre per year
- Apply so as to avoid runoff or puddling of irrigation water.
- Do not apply to areas which are waterlogged or saturated, which will not allow penetration into the root zone.
- Before application, ensure that application equipment is properly calibrated.
- Do not use this product on commercial sod farms.
- Do not use this product in commercial greenhouses, nurseries, on sod farms, or on grass grown for seed.
- 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 should be observed.

Turfgrass Applications

Apply ImiGold 0.5 G to turf and ornamentals in sites such as:

- | | |
|-------------------------------|------------------------------------|
| Airports | Home lawns |
| Athletic fields | Multi-family residential complexes |
| Business and office complexes | Parks |
| Cemeteries | Playgrounds |
| Golf courses | Shopping complexes |

Due to the residual activity of the active ingredient, applications of ImiGold 0.5 G Insecticide may be made before target pests lay their eggs. For best control, apply before the eggs hatch, basing the need for application on historical monitoring, current season trapping, or other methods. All applications should be followed by rainfall or irrigation to move the active ingredient through the thatch.

When infested turfgrass areas are waterlogged, or soil beneath turf is saturated with water, avoid making applications because it is difficult to obtain thorough and consistent distribution of the product. For best results, ensure that rainfall or irrigation after application will vertically penetrate the soil, allowing the active ingredient to be carried into the zone where the pests are found.

PESTS	RATE	INSTRUCTIONS
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IMIGOLD 0.5 G		
Larvae of: Annual bluegrass weevil Asiatic garden beetle Billbugs Black turfgrass ataenius Cutworms (suppression) European chafer European Crane Fly Green June beetle Japanese beetle Northern masked chafer Oriental beetle Phyllophaga spp. Southern masked chafer	50 to 80 lb per acre or 1.2 to 1.8 lb per 1000 sq. ft.	For best control of grubs, billbugs, European crane fly and annual bluegrass weevil, apply before egg hatch. <u>Chinchbugs (suppression)</u> : apply before first instar nymphs hatch. <u>Mole crickets</u> : apply before or during the peak egg hatch period. When adults or large nymphs are present and actively tunneling, ImiGold 0.5 G Insecticide application should be accompanied by a curative insecticide. Consult your local State Agricultural Experiment Station or State Extension Turf
Chinch bug (suppression) Mole crickets	80 lb per acre or 1.8 lb per 1000 sq. ft.	Specialists for assistance regarding timing of application. NOTE: For best control, irrigation or rainfall should occur within 24 hours after application to move the active ingredient through the thatch. On golf courses, irrigate treated areas following application. Avoid mowing turf or lawn area until sufficient irrigation or rainfall has occurred. Do not apply more than 80 lb. ImiGold 0.5 G Insecticide (0.4 lb. of active ingredient) per acre per year.

Ornamental Applications

Apply ImiGold 0.5 G Insecticide to plants used for aesthetic purposes or climatic modification that are being grown in interior landscapes, ornamental gardens or parks, or on golf courses or lawns and grounds.

ImiGold 0.5 G Insecticide can be used as a broadcast application on ornamentals in commercial and residential landscapes. Because ImiGold 0.5 G Insecticide is a systemic product that is translocated upward within the plant system, best control will be achieved when applications are followed by sufficient mechanical incorporation, irrigation or rainfall to move the active ingredient into the soil. Apply before anticipated pest infestation for best control.

Application

Apply ImiGold 0.5 G Insecticide uniformly over the area being treated with drop-type or rotary-type spreaders. Avoid the use of spreaders which apply material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions, and check frequently to be sure equipment is working properly and distributing granules uniformly and accurately.

ORNAMENTAL APPLICATIONS		
Landscape plantings including trees, shrubs, evergreens, flowers, foliage plants, ground covers		
PESTS	RATE	INSTRUCTIONS

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.	Apply as a broadcast treatment. Before applying, remove black plastic or other weed barrier material that will not permit water to reach soil surface. NOTE: For best control, mechanical incorporation, irrigation or rainfall should occur within 24 hours after application to move the active ingredient into the soil. Refer to label sections below for application equipment and spreader settings.
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Spreader Settings for ImiGold 0.5 G Insecticide			
The following chart can be used as a guide in establishing an accurate rate of ImiGold 0.5 G Insecticide. 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/A	80 lb/A
Cyclone Model CB4000	3	3.25	3.50
Earthway Drop	3	9	10
Earthway 10' Rotary	3	11	12
Gandy Turf Tender 24"	3	16	19
Gandy Turf Tender 42"	3	21	23
Lely	4.5	3.50	-
Lesco Model 6000	3	B ½	C
PSB Prizelawn CBR-11	3	3.25	3 1/2
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	3	4	4.50
Drop			
Scott's SS-1 Drop	3	4	4.50
Spyker Model 34	3	3.1	3.2
Vicon Model PS-203	4.5	13	16

TERMITICIDE APPLICATIONS INFORMATION

This ready-to-use formulation of imidacloprid will kill subterranean termite species of *Coptotermes*, *Heterotermes*, *Reticulitermes*, and *Zootermopsis*. Formulated as a granule, this product may be used for perimeter band application and/or soil incorporated. When it has been applied to soil, moisture and/or precipitation will cause the active ingredient to release from the granule. The residue established in the top few inches of soil will kill termites present at the time of application. This product may be applied as a spot treatment in advance of structural treatment or treatment with a conventional soil-applied termiticide or foundation treatment.

USE SITES

Apply ImiGold 0.5 G Insecticide to bare soils, landscaped areas, and turfgrass immediately surrounding sites such as residential structures, and other wooden structures which may be subject to termite infestations.

When infested areas are waterlogged, or soil beneath turf is saturated with water, avoid making applications because it is difficult to obtain thorough and consistent distribution of the product.

APPLICATION

Perimeter use (band application 3 to 10 feet wide around and next to the structure's foundation):
To kill subterranean termites near commercial and residential structures, apply 1.8 lb ImiGold 0.5 G (29 oz) per 1,000 square feet. For best results, irrigate the treated area (though not to the point of runoff) to move the active ingredient into the soil where termites forage. Use standard granular application equipment (hand-held spreaders, shaker cans, wheel-mounted spreaders) to apply ImiGold 0.5 G Insecticide uniformly. Calibrate the application equipment before use, and check frequently to ensure equipment is working properly to distribute the granules uniformly.

Soil incorporation: make spot treatments to kill termites in the soil. Incorporate the product into localized areas of soil along the foundation of structures, or in soil next to threatened wooden constructions. First dig a narrow trench (about 6 inches wide by 6 inches deep), then incorporate 1/6 lb (3.0 oz) ImiGold 0.5 G Insecticide per linear foot of trench. Mix the product completely with the soil used to refill the trench. Or incorporate 1/3 lb (5.0 oz) ImiGold 0.5 G Insecticide per square foot of surface at critical spots such as around plumbing, bath traps, utility services or wells/cisterns, and around poles or posts, fencing and decking materials, landscape timbers and similar non-structural places where wood comes into contact with soil.

One level cup of ImiGold 0.5 G Insecticide equals approximately 8.5 oz.

STORAGE AND DISPOSAL

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

To Confine Spills: 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 Disposal: 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.

**IMPORTANT INFORMATION
READ BEFORE USING PRODUCT**

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product reflect the opinion of experts based on field use and tests, and must be followed carefully. 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 manner of use or application, weather or crop conditions, presence of other

materials or other influencing factors in the use of the product, which are beyond the control of United Phosphorus, Inc. or Seller. Handling, storage, and use of the product by Buyer or User are beyond the control of United Phosphorus, Inc. and Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold United Phosphorus, Inc. and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, United Phosphorus, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or United Phosphorus, Inc., and Buyer and User assume the risk of any such use. To the extent consistent with applicable law, UNITED PHOSPHORUS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, United Phosphorus, Inc. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product and **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF UNITED PHOSPHORUS, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF UNITED PHOSPHORUS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

United Phosphorus, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by the duly authorized representative of United Phosphorus, Inc.

Rev. 3/25/2008

