

70506-142

07/14/2009

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

JUL 14 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 70506-143

EPA Registration Number 70506-142 ✓

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

Sincerely,

A handwritten signature in black ink, appearing to read "Dani Daniel".

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

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0068, Approval expires 05-31-98



EPA

United States
Environmental Protection Agency
 Washington, DC 20460

- Registration
 Amendment
 Other:

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 70506-142	2. EPA Product Manager Kable Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ImiGold 0.5 G Turf, Ornamental, and Termiticide/Insecticide	PM# 1	
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

Amendment - Explain below. Final printed labels in response to Agency letter dated _____
 Resubmission in response to Agency letter dated _____ "Me Too" Application
 Notification - Explain below. Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of label change per PR Notices 2007-4 and 2001-5. This notification is consistent with the guidance in PR Notices 2007-4 and 2001-5, and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, 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:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other _____
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*Certification must be submitted

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 30 lb bags	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product
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6. Manner in Which Label is Affixed to Product
 Lithograph Other: _____
 Paper glued
 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
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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.

2. Signature <i>Timothy M. Formella</i>	3. Title Senior Registration Manager	6. Date Application Received (Stamped)
4. Typed Name Timothy M. Formella	5. Date <i>June 19, 2009</i>	

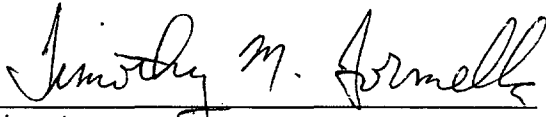
Certification with Respect to Label Integrity

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- 142	6/19/2009	070506-00142.20090619.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.



 Signature

06/19/2009

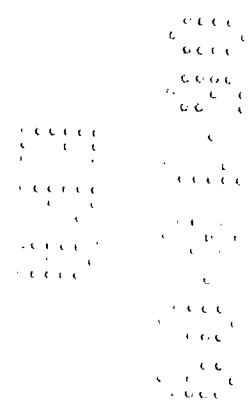
 Date

Timothy M. Formella

 Name (typed)

Senior Registration Manager

 Title





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)

June 19, 2009

VIA: United Parcel Service

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:

FILE COPY

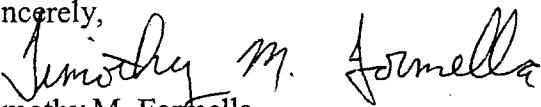
United Phosphorus, Inc.
June 19, 2009

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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, 070506-00156.20090619.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

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**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.

NOTE: Not registered for use in New York State.

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.

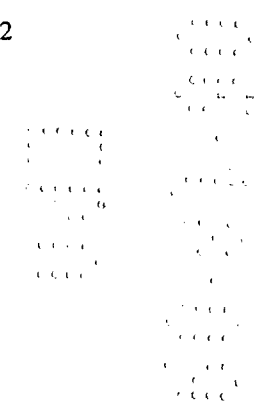
Turfgrass Applications

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 IMIGOLD 0.5 G	INSTRUCTIONS
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.

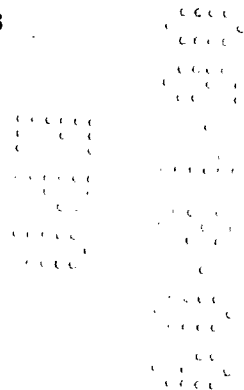
Ornamental Applications

Apply ImiGold 0.5 G Insecticide to plants used for aesthetic purposes or climatic modification that are being grown in interior plantscapes, 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.



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ORNAMENTAL APPLICATIONS		
Landscape plantings including trees, shrubs, evergreens, flowers, foliage plants, ground covers		
PESTS	RATE	INSTRUCTIONS
White grub larvae (such as Japanese beetle larvae, Chafer, <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.

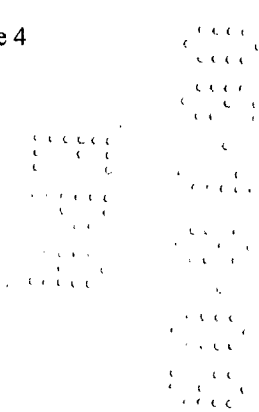
Spreader Settings for ImiGold 0.5 G Insecticide			
The following chart can be used as a guide in establishing an accurate rate of ImiGold 0.5 G Insecticide. Application rates will vary depending upon speed, equipment wear and condition of spreader. Carefully calibrate application equipment prior to commercial 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 1/2	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 Drop	3	4	4.50
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 and disposal.

Pesticide Storage: Store in a cool, dry area 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 bag into application equipment. Then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Deleted: or

Deleted: place

Deleted: To Confine Spills:

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.

**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.

