

70506-142

08-14-2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 14 2009

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

Subject: **Notification:** Revision of Primary Product Name
ImiGold 0.5 G Turf, Ornamental, and Termiticide/Insecticide
EPA Reg. No. 70506-142
Date Submitted: July 31, 2009

Dear Mr. Formella:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated July 31, 2009 for the product referenced above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

Please note that, with the acknowledgment of this notification, the official product name for this product has been changed to ImiGold 0.5 G Turf & Ornamental Insecticide. Please use this product name in all future correspondences with the Agency regarding this product.

If you have any questions regarding this letter, please contact me at (703) 306-0415 or davis.kable@epa.gov.

Sincerely,

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

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Office of Pesticide Programs

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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 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. _____ NOTIFICATION AUG 14 2009 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 to change 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:

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 pound bag	5. Location of Label Directions <input checked="" 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 checked="" 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
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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.

6. Date Application Received
(Stamped)

2. Signature 	3. Title Senior Registration Manager
4. Typed Name Timothy M. Formella	5. Date July 31, 2009



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)

July 31, 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 of change in Primary Brand Names

Dear Ms. Arrington:

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

<u>EPA Reg. No.</u>	<u>Current Primary Brand Name</u>	<u>New Primary Brand Name</u>
70506-142	ImiGold 0.5 G Turf, Ornamental, and Termiticide/Insecticide	ImiGold 0.5 G Turf & Ornamental Insecticide
70506-150	ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide	ImiGold 2 F Turf & Ornamental Insecticide

In addition we are removing the restrictions from the labels against use in New York State. 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 product, to support this registration notification:

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: 070506-00142.20090731.pdf and 070506-00150.20090731.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.

Sincerely,

Timothy M. Formella
Senior Registration Manager

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GROUP 4 INSECTICIDE

**IMIGOLD 0.5 G
Turf & Ornamental Insecticide**

Deleted: ,
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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.

Deleted: ¶
This Product is Not Registered for Use in New York State

ACTIVE INGREDIENT

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

NOTIFICATION

AUG 14 2009

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.
Batch/Lot # _____

PRECAUTIONARY STATEMENTS

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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.

Deleted: 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 ataeenius 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, 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.

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 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.

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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.

**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.

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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. AND SELLER MAKE NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ON THIS LABEL.

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