

70506-143

7/14/2009

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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 70506-142**  
**EPA Registration Number 70506-143**

**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](mailto:daniel.dani@epa.gov)

Sincerely,

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

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

2009

# NOTIFICATION

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98



United States  
**Environmental Protection Agency**  
Washington, DC 20460

- Registration
- Amendment
- Other:

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 70506-143	2. EPA Product Manager Kable Bo Davis	3. Proposed Classification  <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ImiBloc 0.5 G 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. <b>Expedited Review.</b> 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 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:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other _____		
*Certification must be submitted If "Yes" Unit Packaging wgt.    No. per container		If "Yes" Package wgt.    No. per container			
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	
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 <b>Timothy M. Formella</b>	Title Senior Registration Manager	Telephone No. (Include Area Code) 610-491-2813
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 <b>(Stamped)</b>
2. Signature 		
3. Title Senior Registration Manager		
4. Typed Name Timothy M. Formella		5. Date June 19, 2009

# 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- 143	6/19/2009	070506-00143.20090619.pdf

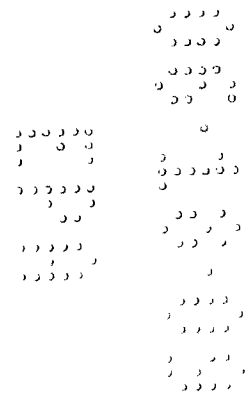
I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Timothy M. Formella  
 Signature

06/19/2009  
 Date

Timothy M. Formella  
 Name (typed)

Senior Registration Manager  
 Title



4089



# United Phosphorus, Inc.

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**

<b>UPI Imidacloprid Technical Insecticide</b>	<b>EPA Reg. No. 70506-122</b>
<b>ImiGold 0.5 G Turf, Ornamental, and Termiticide/Insecticide</b>	<b>EPA Reg. No. 70506-142</b>
<b>ImiBloc 0.5 G Termiticide/Insecticide</b>	<b>EPA Reg. No. 70506-143</b>
<b>ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide</b>	<b>EPA Reg. No. 70506-150</b>
<b>Imidacloprid 2 F MUP Insecticide</b>	<b>EPA Reg. No. 70506-151</b>
<b>Aura 2 F Insecticide</b>	<b>EPA Reg. No. 70506-152</b>
<b>Imidacloprid 70 DF Agricultural Insecticide</b>	<b>EPA Reg. No. 70506-153</b>
<b>Fist 1.6 F Insecticide</b>	<b>EPA Reg. No. 70506-154</b>
<b>ImidaMax 4 F Insecticide</b>	<b>EPA Reg. No. 70506-155</b>
<b>ImiGold 70 DF Turf and Ornamental Insecticide</b>	<b>EPA Reg. No. 70506-156</b>
<b>ImiGold 70 DF Turf, Ornamental, and Greenhouse Insecticide</b>	<b>EPA Reg. No. 70506-157</b>
<b>ImiBloc 70 DF Termiticide/Insecticide</b>	<b>EPA Reg. No. 70506-158</b>
<b>ImiBloc 4 F Termiticide/Insecticide</b>	<b>EPA Reg. No. 70506-168</b>

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:

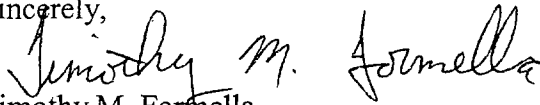
**FILE COPY**

United Phosphorus, Inc.  
June 19, 2009

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](mailto:tim.formella@uniphos.com).

Sincerely,



Timothy M. Formella  
Senior Registration Manager

red-lined copy  
60af9

# NOTIFICATION GROUP 4 INSECTICIDE

## SOL 1A AND IMIBLOC 0.5 G Termiticide/Insecticide

Not For Use in New York State

For use by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For 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**

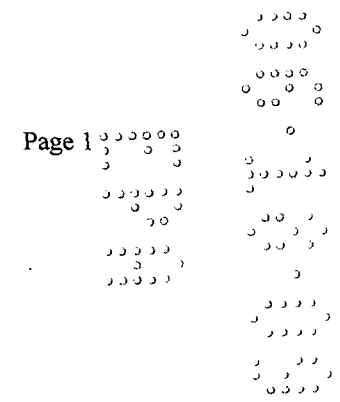
<b>FIRST AID</b>	
If Swallowed	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If on Skin or Clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If In Eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
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.	
<b>NOTE TO PHYSICIAN:</b> 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](http://www.upi-usa.com)

Contents:  
EPA Reg. No. 70506-143  
EPA Est. No.  
Batch/Lot # \_\_\_\_\_

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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 For Use in New York State

**GENERAL 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 ImiBloc 0.5 G Termiticide/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.

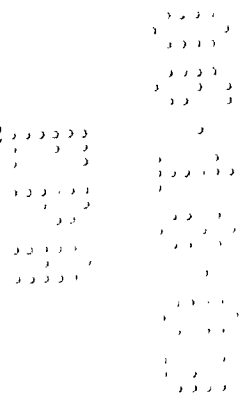
**APPLICATION**

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 ImiBloc 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 ImiBloc 0.5 G Termiticide/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) ImiBloc 0.5 G Termiticide/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) ImiBloc 0.5 G Termiticide/Insecticide per square foot of surface at critical spots such as around plumbing, bath



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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 ImiBloc 0.5 G Termiticide/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

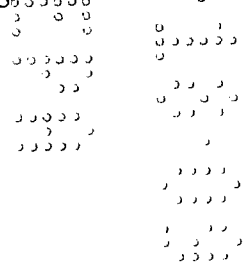
**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

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.

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**

Deleted: 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.





**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. 06/19/09

