

70506-150

09/15/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 15 2008

Dave Olsen
United Phosphorus, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Dear Mr. Olsen:

Subject: Labeling Amendment, adding Termiticide usage and updated CSF
Imigold 2 F Turf & Ornamental Insecticide
EPA Registration No. 70506-150
Date Submitted: July 23, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, and is acceptable with the following provisions:

1. In the "**GENERAL PRECAUTIONS FOR TERMITICIDE APPLICATIONS**" heading, revise the heading to read "**PRECAUTIONS FOR TERMITICIDE APPLICATIONS.**" The information below this header is mandatory, not advisory.
2. 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 Assurance. As an alternative, you may refer consumers to the company's phone number or email address.

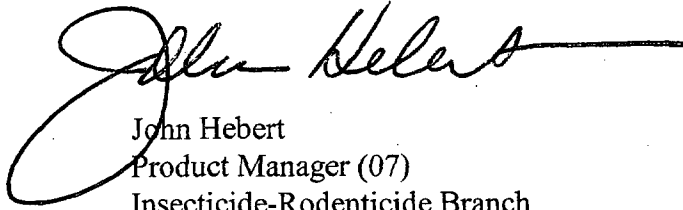
The new product brand name based on the amendment of the label is acceptable.

The confidential statements of formula dated July 23, 2008 for both the basic and alternative formulations have been reviewed and are acceptable. All other previous basic confidential statements of formula are considered obsolete.

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A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact Autumn Bonomi at (703) 305-5314.

Sincerely,



John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

IMIGOLD 2 F Turf, Ornamental, and Termiticide/Insecticide

For insect control (both foliar and systemic) in turfgrass (including sod farms), ornamentals, fruit and nut trees, and interior plantscapes
Not for Sod Farm use in Arizona

ALSO

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 prevention and control of subterranean termites and carpenter ants
Not registered for Termiticide use in New York State

ACTIVE INGREDIENT

Imidacloprid - 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....21.4%

OTHER INGREDIENTS78.6%

Total 100%

ACCEPTED
With COMMENTS
In EPA Letter Dated:
SEP 15 2008

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

70506-150

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
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 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 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 Control 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

Net Contents:
EPA Reg. No. 70506-150
EPA Est. No.

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

Harmful if swallowed or absorbed through skin or if inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist.

Personal Protective Equipment (PPE):

WPS and Termiticide Uses: Applicators and other handlers (mixers and loaders) who handle this product for any use covered by the Worker Protection Standard (40 CFR part 170) – in general, agricultural plant uses such as sod farms, must wear:

- Long-sleeved shirts and long pants
- Chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.
- Shoes plus socks.

Follow manufacturer’s instructions for cleaning/maintaining personal protective equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

When used as a termiticide, once the product is diluted as directed on the label, shirt, pants, shoes and socks may be worn. All pesticide handlers must wear protective eyewear when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injection.

Non WPS Uses: Applicators and other handlers who handle this product for any use NOT covered by the Worker Protection Standard (40 CFR part 170) must wear:

- Shirt and pants
- Gloves
- Shoes plus socks

Engineering Controls Statements:

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

Important: when reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for “Applicators and Other Handlers” and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

<p>USER SAFETY RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. • Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. • Remove PPE immediately after handling. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water, to 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 product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

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.

Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treatment area (site) is likely to occur.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treatment areas during the restricted entry interval (REI) of 12 hours. Earlier entry by exception.

Exception: If the product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material such as, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.
- Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Keep children and pets off treated area until dry.

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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of the smoke.

TURFGRASS/GRASSY AREA APPLICATIONS

Do not apply more than a total of 1.6 pints (0.4 lb a.i.) per acre per year.

Apply ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide to the following sites, to control/suppress the pests listed in the chart below.

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

PESTS CONTROLLED

- Northern and Southern masked chafers
- Asiatic garden beetle
- European chafer
- Green June beetle
- May or June beetle
- Japanese beetle
- Oriental beetle
- Billbugs
- Annual bluegrass weevil
- Annual bluegrass ataenius
- European crane fly
- Mole crickets

PESTS SUPPRESSED

- Cutworms
- Chinchbugs

* NOTE: Not for Sod Farm use in Arizona.

Due to the residual activity of the active ingredient, applications of ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide may be made before target pests lay their eggs. For best control, apply before the eggs hatch. 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.

Application

Apply ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide in sufficient water to provide adequate distribution in the treated area. Use a low pressure setting, and apply a uniform coarse droplet spray. Calibrate equipment regularly to ensure that the product is being distributed properly.

PESTS	RATE IMIGOLD 2 F	INSTRUCTIONS
Larvae of: Annual bluegrass weevil Asiatic garden beetle Billbug Black turfgrass ataenius Chinchbugs (suppression) Cutworms (suppression) European crane fly European chafer Green June beetle Japanese beetle Mole crickets Northern masked chafer Oriental beetle <i>Phyllophaga</i> spp Southern masked chafer	1.25 to 1.6 pt/A or 0.46 to 0.6 fl oz (14 to 17 mL) per 1000 square ft	For best control, apply before egg hatch. To ensure that the active ingredient moves into the turf, irrigation or rainfall should occur within 24 hours of application. Avoid mowing until after sufficient irrigation or rainfall has occurred. <u>For chinch bugs (suppression)</u> , apply the maximum rate before the first instar nymphs hatch. <u>For mole crickets</u> , apply before or during the peak egg hatch period. For adults or large nymphs that are actively tunneling, combine ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide with a curative insecticide. Do not apply more than 1.6 pt (0.4 lb a.i.) per acre per year.

ORNAMENTAL APPLICATIONS

For use on ornamental plants in commercial and residential landscapes and interior plantscapes.

For outdoor ornamentals, do not apply more than a total of 1.6 pt (0.4 lb a.i.) per acre per year.

Because ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide is a systemic insecticide that is transported within the plant system from the roots to the upper foliage, it must be applied into a growing area of the plant so that the active ingredient can be absorbed. To promote the uptake of active ingredient, soluble nitrogen type fertilizers can be added to the spray solution.

Applications can be made by foliar or soil applications, including soil injection, drenches, and broadcast sprays. Foliar applications provide locally systemic activity against insect pests.

When the product is applied to woody plants using soil application, the systemic translocation of the active ingredient will be slower, and can take as much as 60 days and sometimes longer, depending on the species and size of the plant.

Resistance

Some species of insects can develop resistance to neonicotinoid class insecticides such as imidacloprid, following repeated use. Use this product with resistance management strategies established for the use area.

Use for Ant Management

Use ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide to control ants by removing honeydew as their food source. ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide will control the aphids, scale insects, mealybugs and other sucking pests on ornamentals. For greater ant control, supplement foliar application with residual sprays, baits, or other ant control tactics.

Application

ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide may be used in many types of application equipment. It mixes well with water. For better coverage on hard to wet foliage on plants such as holly, ivy, or pine, add a commercial spreader/sticker.

ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide is compatible with many fungicides, miticides, liquid fertilizers, and insecticides. If the applicator does not have experience with a particular tank mix, use a clear jar to test compatibility using the proportions of the proposed tank mixture.

Media with 30% or higher bark content may confer a shorter period of protection when treated with ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide.

Do not apply through any irrigation system.

PLANTS	PESTS	RATE IMIGOLD 2 F	INSTRUCTIONS
Trees Shrubs Evergreens Flowers Foliage plants Groundcovers Interior Plantscapes	Adelgids Aphids Japanese beetles Lace bugs Leaf beetles (including elm & viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Mealybugs Psyllids Sawfly larvae Thrips (suppr.) Whiteflies White grub larvae (Japanese beetle, chafers, Phyllaphaga spp, Asiatic garden	1.5 fl oz (45 mL) per 100 gallons of water	Before pest populations become established, make foliar applications. Apply as needed. Mix the required amount of product in enough water for uniform and accurate coverage. Do not use less than 2 gallons of water per 1000 sq ft. It may be necessary to irrigate thoroughly to incorporate ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide into the upper soil zone. To control white grub larvae, apply 0.46 to 0.6 fl oz (14 to 17 mL) per 1000 sq ft.

	beetle, Oriental beetle)		
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Only for this use in and around industrial and commercial buildings and residential areas, and interiorscapes, and state, national, and private wooded and forested areas.

ORNAMENTAL PLANTS	PESTS	RATE IMIGOLD 2 F	INSTRUCTIONS
Trees Shrubs Flowers Groundcovers	Adelgids Aphids Armored scales (suppression) Black vine weevil Elm and viburnum) Eucalyptus longhorned borer Flatheaded borers (incl. bronze birch and alder borer) Japanese beetles Lace bugs Leafminers Leaf beetles (incl. Pine tip moth larvae) Leafhoppers (incl. glassywinged sharpshooter) Mealybugs Psyllids Royal palm bugs Sawfly larvae Soft scales Thrips (suppression) larvae White grub larvae Whiteflies	TREES* 0.1 to 0.2 fl oz (3 to 6 mL) per inch trunk diameter (D.B.H.) SHRUBS** 0.1 to 0.2 fl oz (3 to 6 mL) per foot of shrub height FLOWERS & GROUNDCOVERS 0.46 to 0.6 fl oz (14 to 17 mL) per 1000 sq ft	TREES, SOIL INJECTION: for a grid system, apply in a grid pattern on 2.5 centers within the tree's drip line. For a circle system, apply in evenly spaced holes approximately 1-3 ft apart in a circle within the tree's drip line. More circles may be needed for larger trees. For a basal system, apply in evenly spaced holes no more than 6 to 12 inches out from the tree's base. TREES, SOIL DRENCH: Apply in at least 10 gallons water per 1000 sq ft as a drench around the base of the tree, directed to the root zone. Remove any barrier that may prevent the solution from reaching the root zone. SHRUBS, SOIL INJECTION: Apply to individual plants using dosage indicated. SHRUBS, SOIL DRENCH: Apply as a uniform drench around the base of the shrub, in at least 10 gallons water per 1000 sq ft. Remove any barrier that may prevent the solution from reaching the root zone. FLOWERS AND GROUNDCOVERS: Apply as a broadcast treatment, incorporating into the soil before planting. Application can also be made after the plants are established; in this case best control is achieved if plants are irrigated after application.

* Notes and restrictions for TREES: Use enough water so that an equal amount of solution may be injected in each hole. Use low pressure and enough solution to ensure thorough distribution. Keep soil moist for 7-10 days. Use at least 4 holes per tree. No soil injection applications are allowed in Nassau or Suffolk Counties of New York. If trees are already heavily infested with borers, application may not save the tree.

** Notes and restrictions for SHRUBS: Use enough water so that an equal amount of solution may be injected in each hole. Use low pressure and enough solution to ensure thorough distribution. Use at least 4 holes per shrub. No soil injection applications are allowed in Nassau or Suffolk Counties of New York.

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FOR USE ON POME FRUITS IN AND AROUND RESIDENTIAL AREAS ONLY

(Apple, Crabapple, Loquat, Mayhaw, Pear, Pear (oriental), Quince)

PESTS	RATE IMIGOLD 2 F	INSTRUCTIONS
<p>Aphids (except Woolly apple aphid) Leafhoppers (incl. glassy-winged sharpshooter) Leafminer Mealybugs (not for use on this pest in pears in California) San Jose Scale</p>	<p>1.5 fl oz (45 mL) per 100 gallons or 6.0 fl oz/Acre Note: the amount of product per acre will vary according to tree size and volume of foliage. This rate is based on a standard 400 gallons dilute solution per acre for large trees.</p>	<p>Apply at the recommended rate as needed once petal fall is complete. Do not apply more than 6.0 fl oz per acre in one single application. Do not make more than 5 applications. Do not apply more often than every 10 days. Preharvest interval: 7 days. <u>Rosy apple aphid</u>: apply before the pest begins leafrolling. <u>First generation leafminers</u>: apply as soon as petal fall is complete. For best control, apply as early as possible. <u>Second and later generation leafminers</u>: apply early in the adult flight to control eggs and early instar larvae. If necessary under conditions of severe pressure or overlapping generations, make a second application 10 days later. Applying only once may result only in suppression. This product will not control late stage larvae. <u>San Jose Scale</u>: make application at the crawler stage. Treat each generation. <u>Leafhoppers, late season control</u>: apply when most leafhoppers are nymphs. <u>Mealybug</u>: for best control, good coverage of trunk, scaffolding limbs, or other resting sites is essential.</p>

FOR USE ON PECANS IN AND AROUND RESIDENTIAL AREAS ONLY

Note: use on pecans is not allowed in California unless specific supplemental labeling exists

PESTS	RATE IMIGOLD 2 F	INSTRUCTIONS
<p>Yellow pecan aphid Black margined aphid Pecan leaf phyloxera Pecan spittlebug Pecan stem phylloxera</p>	<p>1.5 fl oz (45 mL) per 100 gallons or 6.0 fl oz/Acre Note: the amount of product per acre will vary according to tree size and volume of foliage. This rate is based on a standard 400 gallons dilute solution per acre for large trees.</p>	<p>Make foliar applications before pest population becomes severe. For optimum control, 2 applications at 10- to 14-day intervals may be needed. Scout and retreat if necessary. Treat foliage to ensure thorough, uniform coverage. An organosilicone-based spray adjuvant may be added at a rate not exceeding the manufacturer's recommendation, to improve coverage. Do not apply more than 18.0 fl oz ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide per acre per year. Do not apply more than 3 times per year. Do not apply more often than every 10 days.</p>

FOR USE ON GRAPES IN AN AROUND INDUSTRIAL AND COMMERCIAL BUILDINGS AND RESIDENTIAL AREAS

PESTS	RATE IMIGOLD 2 F	INSTRUCTIONS
Leafhoppers, incl. glassy-winged sharpshooter Mealybugs	1.5 fl oz (45 mL) per 100 gallons or 3.0 fl oz/Acre (90 mL/A)	Apply as a foliar spray using 200 gallons water per acre. Do not apply more than 6.0 fl oz ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide per acre per year. Do not apply more often than every 14 days. ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide may be applied up to and including the day of harvest.

RESTRICTIONS

Do not graze treated areas or use clippings from treated areas for feed or forage.
 Avoid runoff or puddling of irrigation water following application.
 Keep children and pets off treated area until dry.
 Avoid application of ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant.
 Do not apply more than 1.6 pt (0.4 lb ai) per acre per year.
 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 plantback interval should be observed.

APPLICATION AS A TERMITICIDE

NOTE: Not registered for Termiticide use in New York State.

ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide may be used in and around structures and building construction to control and prevent termite infestations.

GENERAL INSTRUCTIONS

For subterranean termite control, specific treatment recommendations may differ due to local regulations, treatment procedures, soil types, construction practices, and other factors. The purpose of chemical soil treatment for termite control is to establish a continuous chemical treated zone (vertical and/or horizontal) between the wood and other cellulose material in the structure and the termite colonies in the soil. Follow all federal, state, and local regulations and treatment standards for protection of a structure from termites. The establishment of an aerial or above ground colony may require additional treatments to control the termites, as well as landscape modifications, and/or structural repairs to deny termites of a moisture source. Use a 0.05% to 0.1% solution based on current recommendations. For a typical control situation, a 0.05% solution is used. A 0.1% solution may be used when a severe or persistent infestation exists.

When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or

residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed.

Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated area, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

MIXING: Refer to the MIXING TABLE for correct amount of ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide to be used.

Follow this procedure for preparing the termiticide solution:

1. Fill tank to 1/3 full.
2. If using large sprayer, start pump to begin bypass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide and remaining amount of water.
4. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

MIXING TABLE FOR IMIGOLD 2 F TURF, ORNAMENTAL, AND TERMITICIDE/INSECTICIDE		
EMULSION CONCENTRATE	GALLONS of WATER	AMOUNT OF IMIGOLD 2 F (fl oz)
0.05%	100	27.5
	50	13.8
	25	6.9
	1	0.3
0.1%	100	55.0
	50	27.5
	25	13.8
	1	0.6

IN-LINE INJECTION: Use the table below to mix the appropriate amount of ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide for the desired injection volume of finished emulsion.

MIXING TABLE FOR INJECTION	
CONCENTRATION	INJECTION VOLUME
0.05%	0.3 fl oz/gal
0.1%	0.6 fl oz/gal

CONVERSION KEY: 128 fl oz = 1 gal; 16 fl oz = 1 pint; 8 pints = 1 gal; 1 fl oz = 29.5 mL

APPLICATION VOLUME

The application volumes listed in the ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide DIRECTIONS FOR USE should be used whenever possible. However, where soil conditions will not accept application of 4 gallons of solution per 10 linear feet, twice the concentration of

ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide may be applied in 2 gallons of solution per 10 linear feet. For example, if 0.05% is the correct use rate to be applied in 4 gallons of water, then 2 gallons of 0.1% solution may be used per 10 linear feet to deliver an equivalent amount of ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide per unit of soil.

PRE-CONSTRUCTION TREATMENT

Do not apply at a lower dosage and/or concentration than specified on this label for application prior to installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

CONCRETE SLAB-ON-GROUND OR BASEMENTS: Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floor, and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other course aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes should not extend below the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat soil which will be placed in the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Rodding in trench followed by flooding of trench and treatment of backfill may provide a better opportunity to achieve a continuous chemical treated zone than using soil rodding alone to establish a vertical termiticide treated zone.

CRAWL SPACES: Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with

the soil, plumbing, and utility services. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot depth to provide a uniform treated zone. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

HOLLOW BLOCK FOUNDATIONS OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST-CONSTRUCTION TREATMENT

CONCRETE SLAB-ON-GROUND: To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. **DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS.** Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

An application should be made by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil as it is being placed in the trench.

Rodding can be done from the bottom of a shallow trench. When rodding, rod holes should be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod hole depth should not extend below the footing.

BATH TRAPS: Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas should be treated with 3 gallons of solution per square foot. An access door or inspection vent should be cut and installed, if not already present.

After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

CRAWL SPACES: When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to **PRE-CONSTRUCTION TREATMENT**). If unable to excavate, crawl space soil treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform chemical treated zone. Use a very coarse spray at a pressure not exceeding 25 PSI at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil at the above rates. Do not apply to inaccessible crawl space areas using pressures greater than 25 PSI at the treatment tool when the valve is open.

Treatment may also be made by drilling through the foundation wall or through the floor above and treating the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform chemical treated zone.

SHALLOW FOUNDATIONS: For shallow foundations, one foot or less in depth, dig a narrow trench approximately 6 inches wide and deep along the outside and inside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to the top of footer to provide a uniform treated zone. The solution should be applied to the trench and mixed with the soil as it is placed in the trench.

BASEMENTS – OUTSIDE PERIMETER: Along the outside of the exterior walls, an application must be made by trenching or rodding within the trench. Rodding depth should be to the top of the footer, or to a minimum of 4 feet, or according to state or local regulations. When rodding through a trench, dig a narrow trench about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone by rodding through the trench. Use a low pressure spray to treat soil which will be placed into the trench after rodding. Mix spray solution with the soil as it is being placed in the trench.

BASEMENTS – INSIDE PERIMETER: If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around sewer pipes, floor drains, conduits, expansion joints or any cracks or holes in the basement floor. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone.

Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

HOLLOW BLOCK FOUNDATION OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

Treatments of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **PRECAUTIONARY STATEMENTS**). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

PLENUMS: For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing, and conduits. The soil should be treated by trenching to a depth of 6 inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 PSI when measured at the treatment tool when the valve is open).

When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

TREATMENT AROUND WELLS OR CISTERNS: Do not contaminate wells or cisterns.

Structures with Wells/Cisterns inside Foundations: Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

- 1 Do not apply within 5 feet of any well or cistern by rodding and/or trenching or by the backfill method. Treat soil between 5 and 10 feet from the well or cistern by the backfill method only. Treatment of soil adjacent to water pipes within 3 feet of grade should be done by the backfill method.
 - a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
 - b) Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
 - c) After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies: Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipes coming from the well to the structure if the pipes enter the structure within 3 feet of grade.
2. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These

precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

- 3. When appropriate (i.e., on water side of the structure); the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

FOAM APPLICATIONS

Construction practices, soil subsidence and other factors may create situations in which a continuous chemical treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices, to provide a continuous treated zone.

Foam application may be made alone or in combination with conventional application methods, provided that the labeled amount of active ingredient per unit area is used.

Foam Application Use Directions: Mix appropriate concentration of ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide in water and add the manufacturer's recommended quantity of foam agent to the ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide solution (see table for foaming recommendations). Apply a sufficient volume of ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide foam alone or in combination with liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

Note: Add the manufacturer's recommended quantity of foam agent to the ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide solution.

MIXING TABLE FOR IMIGOLD 2 F TURF, ORNAMENTAL, AND TERMITICIDE/INSECTICIDE FOAM			
Amount of ImiGold 2 F (fl oz)	Gallons of Water	Foam Expansion Ratio	Finished Foam (0.05 % a.i.)
6.9	1	25:1	25 gal
	2.5	10:1	
	5	5:1	
13.8	1	50:1	50 gal
	2.5	20:1	
	5	10:1	

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, wall voids, under slabs, stoops, porches, or into the soil in crawlspaces, and other similar voids.

Foam and liquid applications must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide must be applied as a typical liquid treatment. The remaining 25% or fewer gallons are delivered to appropriate locations using a foam application.

RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide treated zone in the soil. The vulnerable or

reinfested areas may be treated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions, and other factors which may reduce the effectiveness of the treated zone. Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgment of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment, the applicator should consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

When another registered termite control product/system is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas, ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide may be applied as a spot application in a secondary treatment to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, and foundation cracks, the outside foundation wall, and areas of known or suspected activity at either a pre-construction or post-construction timing. These secondary treatments must be applied in amounts and concentration in accordance with label directions relevant to the treatment area(s) to receive the secondary treatment.

PERIMETER PEST CONTROL

Treat soil, turf or ground cover adjacent to the structure where ants are trailing or may find food or harborage. Apply to flower, shrub or ornamental plant beds adjacent to the structure where ants may find food or forage. To control ants tunneling in soil apply a 0.05% to 0.1% solution as a drench or soil injection at intervals to establish a continuous treated zone. Treat along the edge of walls, driveways or other hard surfaces where ants are tunneling beneath the surface.

Apply in sufficient water to cover the foliage and soil area being treated. Maximum application is once per month to maintain control.

Do not allow residents or pets into the immediate area during the application or contact with treated areas until spray has dried.

Do not use this product against native or imported fire ants, pharaoh or harvester ants.

NOTE: In instances of high pest pressure and quick knockdown or if elimination at pest entry points is needed, additional treatments using ImiGold 2 F Turf, Ornamental, and Termiticide/Insecticide with targeted applications of a pyrethroid to places where pests enter the structure may be made. Read and follow all label directions for use of this companion product.

GENERAL PRECAUTIONS FOR TERMITICIDE APPLICATIONS

- After treatment, plug and fill all holes drilled in concrete slab areas of the building with a suitable sealant.
- Do not apply solution until location of heat pipes, ducts, water and sewer lines, and electrical conduits are known and identified.
Caution must be taken to avoid puncturing and injection into the structural elements.
- Do not plant for the purpose of consumption, edible plants into the treated areas of soil.
- Avoid contamination of public and private water supplies.
- Use anti-backflow equipment or an air gap on filling hoses.

- Consult State, Federal, or local authorities for information regarding the approved treatment practices for areas in close proximity to potable water supplies.

**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.