



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 13, 2018

Sherry Hutcheson
Sr. Regulatory Manager
United Phosphorous, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Subject: Label Amendment – Revise Water Soluble Packaging Directions for Use as per
EPA letter dated April 5, 2017
Product Name: Imigold 75 WSP
EPA Registration Number: 70506-257
Application Date: 03/21/2018
Decision Number: 542251

Dear Ms. Hutcheson:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Paul Di Salvo by phone at 703-347-0322, or via email at disalvo.paul@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Paul P. Salvo, Sr." The signature is written in a cursive style with a large initial "P" and a small "Sr." at the end.

Venus Eagle, Product Manager 07
Invertebrate and Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

GROUP	4	Insecticide
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Imigold 75WSP

Insecticide for foliar and systemic insect control in turfgrass (including sod farms), landscape ornamentals, listed fruit and nut trees and interior plantscapes.

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimin 75.0%

OTHER INGREDIENTS: 25.0%

TOTAL: 100.0%

Keep water soluble packets in this container and store in a cool dry place but not below freezing (32 °F)
Do not remove packets from container except for immediate use.

KEEP OUT OF REACH OF CHILDREN.
CAUTION

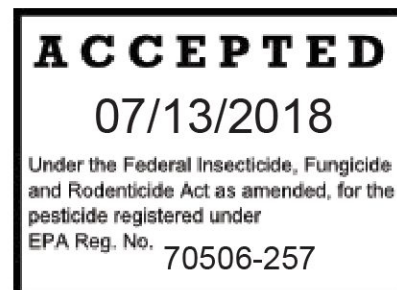
FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF ON SKIN	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15 to 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 to 20 minute. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
In case of emergency call The Rocky Mountain Poison and Drug Center at 1-866-673-6671 . Have a product container or label with you when calling a poison control center or, doctor, or going for treatment.	
Note to Physician: No specific antidote is available. Treat the patient symptomatically.	

**CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident,
call CHEMTREC 1-800-424-9300.**

EPA Reg. No. 70506-257

EPA Est. No.: _____

NET CONTENTS ____ Pounds
United Phosphorus, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
1-800-438-6071



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. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children or pets off treated area until spray is dry.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and Other Handlers Must Wear:

- Long-sleeved shirt 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.
- 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.

ENGINEERING CONTROLS STATEMENT:

Water soluble packets, when used correctly, qualify as a closed mixing/loading system under the Worker Protection Standard [40 CFR 170.607 (d)]. Mixers and loaders handling this product while it is enclosed in intact water soluble packets may elect to wear reduced PPE of long-sleeved shirt, long pants, shoes, socks. 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 break-down.

USER SAFETY RECOMMENDATIONS

User should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. 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, or 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 plants/crops or weeds. Do not apply this product or allow it to drift to blooming plants/crops or weeds if bees are foraging in or adjacent to the treatment area. This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Do not formulate this product into other end-use products.

PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.



Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar.

Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When Using This Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator attractive plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at:

<http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>.

Pesticide incidents (for example, bee kills) should immediately be reported to the state/tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at: www.npic.orst.edu or directly to EPA at:

beekill@epa.gov

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.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, care-fully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may call CHEMTREC 800-434-9300 for decontamination procedures or any other assistance that may be necessary.

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

CONTAINER HANDLING:

(For Product Packaged in Plastic Container) Non-refillable container. Do not reuse or refill this container. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available 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 smoke.

(For Product Packaged in Water-Soluble Packaging) Completely empty bag into application equipment. Then dispose of in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.

See individual sites for specific pollinator protection application restrictions. If non exist under the specific site, for foliar applications, follow these application directions for food/feed crops and commercially grown ornamentals that are attractive to pollinators, and for non-agricultural uses:

FOR FOOD/FEED CROPS AND COMMERCIALY GROWN ORNAMENTALS NOT UNDER CONTRACT FOR POLLINATION SERVICES BUT ARE ATTRACTIVE TO POLLINATORS

Do not apply this product while bees are foraging. Do not apply this product until flowering is complete and all petals have fallen unless one of the following conditions is met:



- The application is made to the target site after sunset
- The application is made to the target site when temperatures are below 55°F
- The application is made in accordance with a government-initiated public health response
- The application is made in accordance with an active state-administered apiary registry program where beekeepers are notified no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying
- The application is made due to an imminent threat of significant crop loss, and a documented determination consistent with an IPM plan or predetermined economic threshold is met. Every effort should be made to notify beekeepers no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying.

Non-Agricultural Uses:



Do not apply Imigold75 WSP while bees are foraging. Do not apply Imigold75 WSP] to plants that are flowering. Only apply after all flower petals have fallen off.

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 treated areas during the restricted-entry interval (REI) of 12 hours.

Exception: If the product is applied by drenching, 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.
- 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 (including sod farms), forests, nurseries, or greenhouses.

Keep children and pets off treated area until dry.

WATER SOLUBLE PACKAGING

Multiple Packaging: This bag contains multiple water soluble packets of this product. Do not handle the packets with wet gloves or allow the packets to become wet prior to addition to spray tank. Do not break open packets. Refer to the Tables of Equivalents to calculate the number of packets to use. If all are not used, close and reseal outer container to protect remaining packet(s).

Single Packagaing: This bag contains one water soluble packet of this product. Do not handle the packet with wet gloves or allow the packet to become wet prior to addition to spray tank. Do not break open packet. Refer to the Tables of Equivalents to calculate the number of packets to use. Open outer bag and drop the unopened inner packet of this product into spray tank.

Preparation of Spray Solution: Do not add any liquid fertilizers, micronutrients or adjuvants to the

spray solution until after the packet and its contents have completely dissolved. Water soluble packet(s) should completely dissolve in approximately five minutes. Dissolution rate may be slowed by cold water, lack of agitation or water containing high concentrations of boron or sulfur.

INSTRUCTIONS FOR USING WATER SOLUBLE PACKAGES DIRECTLY INTO SPRAY TANKS

Water Soluble Packages (WSPs) are designed to dissolve in water. Agitation may be used, if necessary, to help dissolve the WSP. Failure to follow handling and mixing instructions can increase your exposure to the pesticide products in WSPs. WSPs, when used properly, qualify as a closed mixing/loading system under the Agricultural Worker Protection Standard [40 CFR 170.607 (d)].

Handling Instructions:

Follow these steps when handling pesticide products in WSPs.

1. Mix in spray tank only.
2. Handle WSP(s) in a manner that protects package from breakage and/or unintended release of contents. If package is broken, put on PPE required for clean-up and then continue with mixing instructions.
3. Keep the WSP(s) in outer packaging until just before use.
4. Keep the WSP dry prior to adding to the spray tank.
5. Handle with dry gloves and according to the label instructions for PPE.
6. Keep WSP intact. Do not cut or puncture WSP.
7. Reseal the WSP outer packaging to protect any unused WSP(s).

Mixing Instructions:

Follow the steps below when mixing this product, including if tank mixed with other pesticide products. If being tank mixed, the mixing directions 1 through 9 below take precedence over the mixing directions of the other tank mix products. WSPs may, in some cases, be mixed with other pesticide product so long as the directions for use of all mixed products do not conflict. Do not tank mix this product with products that prohibit tank mixing or have conflicting mixing directions.

1. If a basket or strainer is present in the tank hatch, remove prior to adding the WSP to the tank.
2. Fill tank with water to approximately one-third to one-half of the desired final volume of spray.
3. Stop adding water and stop any agitation.
4. Place intact/unopened WSP(s) into the tank.
5. Do not spray water from a hose or fill pipe to break or dissolve the WSP(s).
6. Start mechanical and recirculation agitation from the bottom of tank without using any overhead recirculation, if possible. If overhead recirculation cannot be turned off, close the hatch before stating agitation.
7. Dissolving the WSP(s) may take up to 5 minutes or longer, depending on water temperature, water hardness and intensity of agitation.
8. Stop agitation before tank lid is opened.
9. Open the lid to the tank, exercising caution to avoid contact with dusts or spray mix, to verify that the WSPs have fully dissolved and the contents have been thoroughly mixed into the solution.
10. Do not add other allowed products or complete filling the tank until the bags have fully dissolved and pesticide is thoroughly mixed.
11. Once the WSP have fully dissolved and any other products have been added to the tank, resume filling the tank with water to the desired level, close the tank lid, and resume agitation.
12. Use the spray solution when mixing is complete.
13. Maintain agitation of the diluted pesticide mix during transport and application.

14. It is unlawful to use any registered pesticide, including WSPs, in a manner inconsistent with its label.

APPLICATION TO TURFGRASS

IMIGOLD75WSP will control the following soil inhabiting pests found in turfgrass

PEST	SCIENTIFIC NAME
Northern & Southern masked chafers	<i>Cyclocephala borealis</i> , <i>C. immaculata</i> , and/or <i>C. lurida</i>
Asiatic garden beetle	<i>Maladera castanea</i>
European chafer	<i>Rhizotroqus majalis</i>
Green June beetle	<i>Cotinis nitida</i>
May or June beetle	<i>Phyllophaga spp.</i>
Japanese beetle	<i>Popillia japonica</i>
Oriental beetle	<i>Anomala orientalis</i>
Billbugs	<i>Spherophorus spp.</i>
Annual bluegrass weevil	<i>Hyperodes spp.</i>
Black turfgrass ataenius	<i>Ataenius spretulus</i> and <i>Aphodius spp</i>
European Crane Fly	<i>Tipula paludosa</i>
Mole crickets	<i>Scapteriscus spp.</i>

IMIGOLD75WSP will suppress cutworms and chinch bugs.

IMIGOLD75WSP can be applied on turfgrass in the following sites:

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

IMIGOLD75WSP has adequate residual activity that applications can be made preceding the egg laying activity of the target pests. Best control is achieved when applications are made prior to egg hatch of the pests. Sufficient irrigation or rainfall is required to move the active ingredient through the thatch.

Avoid application when infested turfgrass areas are waterlogged or soil beneath turf is saturated with water. These conditions prevent thorough and consistent distribution. Best results are achieved when rainfall or irrigation after application will penetrate vertically in the soil column carrying the active ingredient into the zone where insects are normally located.

Do not exceed a total of 8.6 ounces application (0.4 lb of active ingredient) per acre per year.
Do not allow product to contact plants in bloom if bees are foraging in the treatment area.
For sod farms, do not use for seed production.

To control Larvae of:

European Crane Fly	Black turfgrass atenioides
Annual bluegrass weevil	Oriental beetle
Green June beetle	Cutworms (suppression)
Asiatic garden beetle	<i>Phyllophaga</i> spp.
Japanese beetle	European chafer
Billbug	Southern masked chafer
Northern masked chafer	

Apply 1.6 ounces (1 packet) per 8,250 to 11,000 sq ft). Make application prior to egg hatch of grubs, billbugs, annual bluegrass weevil, and European Crane Fly to maximize control.

For chinch bugs (suppression) and mole crickets apply 1.6 ounces (1 packet) per 8,250 sq. ft. For suppression of chinchbugs, make application before the hatching of the first instar nymphs.

For control of mole crickets make application before or during the peak egg hatch period. If adults or large nymphs are actively tunneling, IMIGOLD75WSP application should be combined with a curative insecticide. Follow label instructions for other insecticides when tank-mixing.

Consult your local turf, state Agricultural Experiment Station, or State Extension Service Specialists for more specific Information regarding timing of application.

Notes and Restrictions for Turf Grass:

- Irrigation or rainfall should occur within 24 hours after application to move the active ingredient through the thatch.
- Do not apply more than 8.6 ounces (0.4 lb of active ingredient) per acre per year.
- Avoid mowing turf or lawn area, until after adequate irrigation or rainfall has occurred.
- Do not allow product to contact plants in bloom if bees are foraging in the treatment area.

APPLICATION EQUIPMENT FOR USE ON TURFGRASS

Dilute IMIGOLD75 WSP with enough water to provide adequate volume to promote thorough distribution into the pest zone. Use only accurately calibrated equipment for application to turfgrass. Apply a uniform, coarse droplet spray, using a low pressure setting to eliminate off target drift. Calibration should be performed on a regular basis to ensure that equipment is distributing product properly.

APPLICATION TO ORNAMENTALS

IMIGOLD75WSP can be applied to ornamental plants in commercial and residential landscapes and interior plantscapes. IMIGOLD75WSP is a systemic insecticide that is transported within the plant system from the roots to upper foliage. IMIGOLD75WSP must be applied into a growing area of the plant that allows absorption of the active ingredient. Adding soluble nitrogen type fertilizers to the spray solution when appropriate can promote the uptake of the active ingredient.

Application can be made by foliar application or soil applications; including soil injection, drenches, and broadcast sprays. Foliar applications offer locally systemic activity against insect pests.

The systemic translocation of active ingredient will be slower when applied to woody plants with soil applications. This delay can take 60 days or longer depending on species and size of plant. To offset this, make applications before anticipated pest infestation.

For outdoor ornamentals, do not exceed a total of 8.6 ounces (0.4 lb of active ingredient) per acre per year.

ANT MANAGEMENT PROGRAMS

Using IMIGOLD75WSP to control aphids, scale insects, mealybugs and other sucking pests on ornamentals will ant populations because it removes honeydew as a food source. To enhance control of ants, supplement with residual sprays, bait placements or other ant control tactics approved for such use.

Not for use in commercial greenhouses, nurseries, or on grasses grown for seed, or on commercial fruit and nut trees.

APPLICATION EQUIPMENT FOR FOLIAR APPLICATIONS

IMIGOLD75WSP mixes readily with water and may be used in many types of application equipment. Add a commercial spreader/sticker promote coverage on hard to wet foliage such as holly, pine, or ivy.

IMIGOLD75WSP is compatible with many commonly used fungicides, miticides, liquid fertilizers, and other insecticides. If applicator has no prior experience with a particular tank mix, physical compatibility should be checked by making a small clear jar test using correct proportions of products to be tank mixed.

Do not apply through any irrigation system

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 IMIGOLD75WSP to areas which are water logged or saturated, which will not allow penetration into the root zone of the plant.
- Do not apply more than 8.6 ounces (0.4 lb of active ingredient) 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 plant-back interval must be observed.

Use Site: TREES, SHRUBS, EVERGREENS, FLOWERS, FOLIAGE PLANTS, GROUNDCOVERS
AND INTERIOR PLANTSCAPES
(Only in and around Industrial and Commercial Buildings and Residential Areas)

To control:

Adelgids	Leafhoppers
Aphids	(Including glassy-winged sharpshooter)
Japanese beetles	Mealybugs
Lace bugs	Psyllids
Leaf beetles	Sawfly larvae
(Including elm and viburnum leaf beetles)	Thrips (suppression)
	Whiteflies

Apply 1.6 ounces (1 packet) of Imigold75WSP per 300 gallons of water. Make foliar applications before high pest populations become established. Reapply on an as needed basis, not to exceed 8.6 ounces or 0.4 lbs. active ingredient per acre per year (except for interior plantscape applications).

To control White grub larvae, (such as Japanese beetle larvae, Chafers, *Phyllophaga* spp. Asiatic garden beetle, Oriental beetle) apply 1.6 ounces (1 packet) per 8,250 to 11,000 sq ft.

Make broadcast applications by mixing specified rate in enough water to uniformly cover the treated area. Do not use less than 2 gallons of water per 1000 sq ft. If necessary, irrigate thoroughly to incorporate IMIGOLD75WSP into the upper soil profile.

Refer to use directions specific for FLOWERS and GROUND COVERS concerning additional use directions.

Use Site: TREES, SHRUBS, FLOWERS AND GROUNDCOVERS
(Only in and around industrial and commercial buildings and residential areas, and state, national, and private wooded and forested areas)

To control:

Adelgids	Thrips (suppression)
Japanese beetles	Black vine weevil larvae
Leafminers	Psyllids
Sawfly larvae	White grub larvae
Aphids	Eucalyptus longhorned borer
Lace bugs	Leafhoppers
Mealybugs	(including glassywinged sharpshooter)
Soft scales	Royal Palm Bugs
Armored scales (suppression)	Whiteflies
Leaf beetles	Flatheaded borers
(including elm and viburnum leaf beetles)	(including bronze birch and alder borer)
Pine tip moth larvae	

For TREES, apply 1.6 ounces (1 packet) of Imigold75WSP per 24 to 48 inches of cumulative trunk diameter.

Application Technique:

Soil Injection

GRID SYSTEM: Make applications in a grid pattern on 2.5 foot centers within the drip line of the tree.

CIRCLE SYSTEM: Make applications in holes evenly spaced approximately 2 – 3 feet apart in a circle within the drip line of the tree. Larger trees may require additional application circles.

BASAL SYSTEM: Make applications into holes evenly spaced around the base of the tree trunk no more than 6 to 12 Inches out from the base.

Soil Drench

Apply in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Any plastic or other barrier that may prevent drench solution from reaching the root zone must be removed.

Notes and Restrictions for Trees:

- Use sufficient water to able to inject an equal amount of solution in each hole.
- Use low pressure and sufficient solution for thorough distribution into the treatment zone.
- Maintain soil moisture for 7 to 10 days.
- Do not use less than 4 holes per tree.
- No Soil Injection Applications Allowed In Nassau or Suffolk Counties of New York.
- Application to trees already heavily infested with borers listed may not prevent the eventual loss of the trees.
- Do not exceed 8.6 ounces or 0.4 lbs active ingredient per acre per year.
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.

For SHRUBS apply 1.6 ounces (1 packet) of Imigold75WSP per 24 to 48 foot of shrub height.

Application Techniques:

Soil Injection:

Apply to individual plants using dosage Indicated.

Soil Drench:

Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.

Notes and Restrictions for Shrubs:

- Mix required dosage in sufficient water to inject an equal amount of solution in each hole.
- Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. Maintain soil moisture for 7 to 10 days.
- Do not use less than 4 holes per shrub.
- No Soil Injection Applications Allowed In Nassau or Suffolk Counties of New York.

For FLOWERS and GROWDCOVERS apply 1.6 ounces (1 packet) of Imigold75WSP per 8,250 to 11,000 sq ft.

Apply as a broadcast treatment and incorporate into the soil before piling or apply prior to bloom or after all petals have fallen off for established plants. If application is made to established plants, best control is achieved by irrigating after application.

Restrictions:

- Do not exceed 8.6 ounces or 0.4 lbs. active ingredient per acre per year.

Use site: POME FRUITS: (only in and around residential area)
Includes: Apple, Crabapple, Loquat, Mayhaw, Pear, Pear (oriental), Quince

To control:

Aphids (except Wooly apple aphid)	Leafminer
Leafhoppers (including glassy-winged sharpshooter)	Mealybugs*
	San Jose Scale*

Apply 1.6 ounces (1 packet) per 300 gallons of water

OR

2.1 ounces per acre¹.

Notes and Restrictions for Residential Pome Fruits:

- Apply specified dosage as foliar spray as needed after petal-fall is complete.
- For control of rosy apple aphid, apply prior to leafrolling caused by the pest.
- For first generation leafminer control, make first application as soon as petal fall is complete. Greatest leafminer control will result from the earliest possible application. For second and succeeding generations of leafminer, optimal control is obtained from applications made early in the adult flight against egg and early instar larvae. A second application may be required 10 days later if severe pressure continues or if generations are overlapping a single application may result in suppression only. IMIGOLD75WSP will not control late stage larvae.
- For San Jose Scale, time applications to the craw/tar stage. Treat each generation.
- For late season (preharvest) control of leafhopper species, apply IMIGOLD75WSP while most leafhoppers are in the nymphal stage.
- For optimal control of mealybug, insure good spray coverage of the trunk and scaffolding limbs or other resting sites of the mealybug.
- Do not apply more than 2.1 ounces per acre in a single application. Do not make more than 5 applications per year.
- Allow 10 or more days between applications.
- Allow at least 7 days between last application and harvest.
- Not for use in California for control on pears.

¹The amount of Imigold75WSP required per acre depends on tree size and/or volume of foliage. The rate per acre is based on a standard of 400 gallons of dilute spray solution per acre for large trees with full foliage.

PECAN (Only in and around residential area)

(Use on pecans not permitted in California unless directed by state specific 24 (c) supplemental labeling)

To control:

Yellow pecan aphid
Pecan spittlebug
Black margined aphid

Pecan stem phylloxera
Pecan leaf phylloxera

Apply 1.6 ounces (1 packet) per 300 gal

OR

2.1 ounces per acre¹.

Make foliar applications as pest pressure begins to increase. Make a second application 10 to 14 days after first if field scouting reveals continued pest pressure. Use of an organosilicone based spray adjuvant at specified rate can insure thorough coverage of foliage.

Notes and Restrictions for Residential Pecan Trees:

- Do not apply more than a total of 6.3 ounces of IMIGOLD75WSP per acre per year.
- Do not make more than 3 applications.
- Allow 10 or more days between applications.

¹ The amount of Imigold75WSP required per acre depends on tree size and/or volume of foliage. The rate per acre is based on a standard of 400 gallons of dilute spray solution per acre for large trees with full foliage.

GRAPES (For use only in and around industrial and commercial buildings and residential areas)

To control Leafhoppers (including glassy-winged sharpshooter) and Mealybugs apply 1.6 ounces (1 packet) per 300 gallons of water

OR

1.0 ounces per acre as a foliar spray using 200 gallons of water per acre.

Notes and Restrictions for Residential Grapes:

- Do not apply more than a total of 2.0 ounces of IMIGOLD75WSP per acre per year.
- Allow at least 14 days between applications.
- Applications may be applied up to and including day of harvest.

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READ BEFORE USING PRODUCT
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