

71368-61

12/29/2010

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

DEC 29 2010

Nathan Ehresman
Nufarm Americas Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

Dear Mr. Ehresman:

Subject: Fast track amendment to add use sites to technical label
Imidacloprid Technical
EPA Registration No. 71368-61
Your Submissions Dated 10/06/10

The labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide Act, is amended as acceptable provided you make the following change:

Under the DIRECTIONS FOR USE section, delete the word "general" in the last sentence of the first paragraph so the sentence will read "This product is for manufacturing use only and is intended for formulation into end use products with the following use patterns:"

A stamped copy of the labeling is enclosed for your records. Please submit one final printed copy of the labeling before releasing the product for shipment. If you have any questions regarding this label, please contact Autumn Metzger at (703) 305-5314.

Sincerely,

Venus Eagle
Product Manager 01
Insecticide-Rodenticide Branch
Registration Division (7505P)

Imidacloprid Technical

FOR USE IN THE MANUFACTURE OF INSECTICIDES

ACTIVE INGREDIENT:
 Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-
 N-nitro-2-imidazolodimine 98.0%
OTHER INGREDIENTS: 2.0%
TOTAL 100.0%

EPA Reg. No. 71368-61 EPA Est. No. _____

KEEP OUT OF REACH OF CHILDREN
WARNING

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
 For Medical Emergencies Only, Call (877) 325-1840

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. • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF INHALED	<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. • Hold eye open and rinse slowly and gently with water for 15 to 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.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 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.
IF IN EYES	<ul style="list-style-type: none"> • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING

May be fatal if swallowed. Do not breathe the dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco products. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS
 This product is toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the

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requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for manufacturing use only and is intended for formulation into end use products with the following general use patterns:

Terrestrial Food Crop, Terrestrial Feed Crop, and Greenhouse Food Crop
Uses: Apple, Banana, Barley, Blueberry, Bushberry, Caneberry, Canola, Citrus, Coffee, Cotton, Cranberry, Cucurbit Vegetables, Globe Amaranth, Grape, Greenhouse Vegetables, Fruiting Vegetables, Herbs, Head and Stem Brassica Vegetables, Leafy Vegetables, Leafy Petiole Vegetables, Legume Vegetables, Hop, Peanut, Pecan, Plantain, Pomegranate, Pome Fruit, Potato, Root Vegetables, edible seed crops for Sorghum, Soybeans, Sugarbeet, Strawberry, Stone Fruit, Sunflower, Tobacco, Tree Nuts, Tropical Fruit, Tuberoses and Corn Vegetables, and Wheat

Terrestrial Nonfood Crop and Greenhouse Nonfood Crop: Turfgrass, Sod Farms, Production Ornamentals (Trees, Shrubs, Container plants Bedding plants) in Nurseries, Christmas trees.

Forestry Uses: Forest tree nurseries, Poplar, Cottonwood

Residential Outdoor Uses: Landscape ornamentals (trees, shrubs, container & bedding plants), Lawns, Residential gardens and orchards, Structural pest control, Wood and wood structure protection.

Residential Indoor Uses: Interior scapes, Interior plantscapes.

Indoor food and Indoor nonfood Uses: General insect control and structural pest control within domestic dwellings, commercial, food processing, health care, institutional, industrial, and public buildings.

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
Uses for experimental purposes that are in compliance with EPA requirements.

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.

PESTICIDE DISPOSAL: Pesticide 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 DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Completely empty container into manufacturing equipment. Offer for recycling if available or dispose of container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS; OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OR PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

Product of China
 NET WEIGHT: _____ lbs (____ kg)

(RV122310)



ACCEPTED
With COMMENTS
In EPA Letter Dated:
DEC 29 2010

Manufactured for
NUFARM, INC.
 150 Harvester Drive, Suite 200
 Burr Ridge, IL 60527

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

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