

79676-25

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

OFFICE OF
PREVENTION PESTICIDES AND
TOXIC SUBSTANCES

JAN 26 2007

Ms. Michael Kellogg
Etigra. c/o
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Primary Brand Name "Imida E-Ag 5 F ST Insecticide"
EPA Reg. No. 79676-25
Application Dated November 28, 2006

Dear: Ms. Kellogg,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 11/28/2006 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The Confidential Statement of Formula (CSF) and/or label submitted with the application has (have) been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington", is written over a horizontal line.

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 79676-25	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Etigra / Imida E-Pro 5 F ST Insecticide	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Etigra c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of a change in primary brand name per PRN 98-10. The new primary brand name is "Imida E-Ag 5 F ST Insecticide". This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information

☐ Label ☐ Container

4. Size(s) Retail Container

5. Location of Label Directions

☐ On Label
☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph
☐ Paper glued
☐ Stenciled

☐ Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) 253-853-7369
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Certification

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

6. Date Application Received
(Stamped)

2. Signature

3. Title

Agent

4. Typed Name

Michael Kellogg

5. Date

11/20/96

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Imida E-Ag 5 F ST Insecticide

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ACTIVE INGREDIENT:

Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine 48.7%

OTHER INGREDIENTS: 51.3%

TOTAL: 100.0%

Contains 5 lbs. active ingredient per gallon (600 grams per liter) at 20°C

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none">• 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.
HOT LINE 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 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, absorbed through skin, or inhaled. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to birds and aquatic invertebrates. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the high mean high water mark. Do not contaminate water when disposing of equipment washwaters. Cover or incorporate spilled treated seeds.

EPA Reg. No. 79676-25

EPA Est. No.

Manufactured for:

Etigra™

501 Cascade Pointe Lane

Suite 103

Cary, NC 27513

www.etigra.com

Imida E-Ag 5 F ST Insecticide contains imidacloprid, the active ingredient used in Gaucho® 600 and Gaucho® Grande.

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Net Contents:

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PERSONAL PROTECTIVE EQUIPMENT (PPE):

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category C on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves (such as, nitrile rubber, butyl rubber, neoprene rubber, barrier laminate, polyvinyl chloride (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.

USER SAFETY RECOMMENDATIONS

Users 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.

DIRECTIONS FOR USE

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

For use in commercial seed treaters only, with the exception of application to canola, cotton (delinted seed), field corn, sorghum, wheat and barley, which may be made either by commercial seed treatment or as an end-use seed treatment on agricultural establishments at, or immediately before, planting. This product is to be used in liquid or slurry treaters.

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.

Mix thoroughly before use or use entire container at one time. All tank mixes should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

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 seed is treated with the product and the treated seed 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, waterproof gloves, shoes plus socks, protective eyewear.

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USE PRECAUTIONS:

Rape greens grown and harvested from Imida E-Ag 5 F ST Insecticide treated seed must not be used for human and feed consumption. Rapeseed grown and harvested from Imida E-Ag 5 F ST Insecticide treated seed is only for industrial uses and cannot be used for edible oil or any other human/ feed consumption.

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Wheat, Barley, Oats, Rye, Triticale, Sorghum: Do not graze or feed livestock on treated areas for 45 days after planting.

Cotton (delinted seed only): Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of 0.5 lb. of Imida E-Ag 5 F ST Insecticide per acre per cropping cycle.

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ROTATIONAL CROPS:

Treated areas may be replanted with any crop specified on an Imidacloprid insecticide label, or any crop for which a tolerance exists for the active ingredient, as soon as practical following the last application. The following plant-back intervals should be observed for listed crops:

Immediate Plant-Back:

Artichoke	Barley	Brassica (Cole) Leafy Veg.
Canola	Cilantro	Corn, Field
Corn, Sweet	Cotton	Cranberry
Cucurbits	Eggplant	Ground Cherry
Leaf Petiole Veg.	Leafy Veg.	Legume Veg. (except Soybean)
Mustard Seed	Oats	Okra
Pepinos	Pepper	Popcorn
Potato	Rapeseed	Rye
Sorghum	Soybean	Strawberry
Sugarbeet	Tomatillo	Tomato
Triticale	Veg. Root and Tuber	Watercress
Wheat		

30-Day Plant Back:

Cereals including Buckwheat, Millet, Rice and Safflower.

Notes Regarding Rotational Plant-Back Interval:

- Erosion control or soil building cover crops may be planted at any time but cannot be grazed or harvested for food or feed.
- Use a 12-month plant-back interval for any crops not listed on this label or for crops with no established tolerance for the active ingredient.

NOTIFICATION of the crop rotational restriction must be conveyed to the grower by appropriate seed tag labeling or bag printing on all seed units.

NOTE: The purchaser of this product is responsible for ensuring that all seed treated with this product are adequately dyed with a suitable color to prevent its accidental use as food for man or feed for animals. Refer to 21CFR, Part 2.25. Any dye or colorant added to treated seed must be cleared for use under 40 CFR, Part 180.1001. Federal regulations have established official tolerances for certain pesticide residues. In order that residues on food and forage crops will not exceed established tolerances, use only at recommended rates.

Treated seed must not be used for or mixed with food or animal feed or processed for oil. Seed commercially treated with Imida E-Ag 5 F ST Insecticide must be labeled in accordance with all applicable requirements of the Federal Seed Act.

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Labels for commercially treated seed should include the following addition to the Environmental Hazards statement:

Exposed treated seed may be hazardous to birds. Dispose of all excess treated seed and seed packaging by burial away from bodies of water. Cover or incorporate spilled treated seeds.

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For Protection of Stored Seed:

Imida E-Ag 5 F ST Insecticide will provide protection to seed against injury from the following insects when applied at labeled rates equal to or above 0.8 fl. oz. per hundredweight:

Indian Meal Moth (*Plodia interpunctella*) Rice Weevil (*Sitophilus oryzae*)
 Lesser Grain Borer (*Rhizopertha dominica*) Red Flour Beetle (*Tribolium castaneum*)

If the seed has existing populations of stored grain pests, it is recommended that it be fumigated prior to treating and bagging seed.

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For Early Season Protection Against Certain Sucking Insects:

Imida E-Ag 5 F ST Insecticide will provide protection from damage by certain early season insects to seeds and seedlings.

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Canola, rapeseed, mustard seed:

For early season protection of seedlings against injury by aphids, flea beetles and wireworms:

Apply as a commercial seed treatment at 10.24 - 25.6 fl. oz. per hundredweight of seed. Use the higher application rate in areas of severe pressure from flea beetles and foliar insects. To assist in determining the appropriate rate for your region, consult your local agricultural office for pest patterns, history and forecasts.

For suppression of Lygus bugs, including *Lygus spp.* in their second generation and cabbage Seedpod Weevil Larvae, including *Ceutorhynchus assimilis*:

Apply 15.36 - 25.6 fl.oz. per hundredweight of seed.

For End-Use Application at Agricultural Establishments:

Shake Imida E-Ag 5 F ST Insecticide thoroughly before use and apply 5.1 - 12.8 fl. oz. of Imida E-Ag 5 F ST Insecticide per 50 pound bag using an HCBT or Batch Treater. Treat one-half of the seed with one-half of the slurry mix, then add the remaining seed and apply the remaining slurry. Mix until the seed is thoroughly covered.

For extended disease protection, Imida E-Ag 5 F ST Insecticide may be diluted with an approved fungicide mixture.

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Field Corn:

Apply as a seed treatment at the rates recommended for the specific pest(s) listed below:

Pest	Imida E-Ag 5 F ST Insecticide	
	Fl. Oz. per 80,000 Units of Seed	mg. AI per Kernel
Billbug ¹ Black cutworm ² Chinch Bug Corn leaf aphid Corn root worm (Including Northern, Western, Southern and Mexican) ³ Flea beetle Grape Colaspis ¹ Imported fire ant Seed corn maggot Southern corn leaf beetle Southern green stinkbug Thrips White grub Wireworm	6.0	1.34
Chinch bug	2.70	0.60

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Corn leaf aphid Flea beetle Grape colaspis ¹ Imported fire ant Seed corn maggot Thrips White grub Wireworm		
Flea beetle (through 1 leaf stage) Imported fire ant Seed corn maggot (seed protection only) White grub ⁴ Wireworm (seed protection only)	0.72	0.16

- ¹ Will reduce early season feeding damage.
² Reduces feeding damage caused by leaf feeding black cutworms that are ½ inch or less in length.
³ In areas of heavy to severe corn rootworm populations, protection will not be adequate. Use only in areas of light to moderate corn rootworm populations. Consult you State Agricultural Extension Service to determine local severity of corn rootworm populations.
⁴ Will reduce feeding damage during emergence and seedling stages.

Field Corn: For End-Use Application At Agricultural Establishments:

Shake Imida E-Ag 5 F ST Insecticide thoroughly before use and dilute with water and/or an approved fungicide mixture. The final slurry rate should be adjusted to apply at a rate of 8-10 fl. oz. of diluted slurry per 50-pound bag of seed. Apply using an HCBT or Eight-Bag Batch Treater and treat one-half of seed with one-half of the slurry mix, then add the remaining seed and apply the remaining slurry. Mix until the seed is thoroughly covered. Following the Imida E-Ag 5 F ST Insecticide application, apply 0.75 oz. of dry TALC per 50-pound bag of seed and allow it to distribute evenly on the seed.

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Wheat, Barley, Oats, Rye, Triticale:

Do NOT graze or feed livestock on treated areas for 45 days after planting.

To provide early season protection of seedlings against injury by aphids (including Bird cherry-oat, English grain, Greenbug and Russian wheat aphid) and Hessian fly:

Prior to planting, apply 0.8-2.4 fluid ounces per hundredweight of seed as a slurry treatment.

For suppression of wireworm activity on seed and young seedlings:

Apply 0.13-0.26 fl. oz. per hundredweight of seed.

To provide early season protection from grasshopper damage:

Apply 1.2-2.4 fluid ounces per hundredweight and for best results, be sure seed is uniformly treated. Treated seed may be planted as a 50 - 60 foot border around the edges of the field; for details regarding grasshopper control in your area, consult your local university extension entomologist. Use the higher rate to provide increased length of protection, protection from severe insect pressure, protection from wireworms, and to reduce potential spread of Barley yellow dwarf virus due to aphid vectors.

For End-Use Application in Agricultural Establishments:

For best results, deliver accurate rates of Imida E-Ag 5 F ST Insecticide by applying using a Total Slurry Treater (TST), Farmer Applied Seed Treater (F.A.S.T.), or other on-farm seed treating equipment. For seed and seedling protection against fungal as well as insect pests, Imida E-Ag 5 F ST Insecticide should be combined with a fungicide product. Depending on fungicide formulation used, dilution of the slurry with water may be necessary. Apply 0.8-2.4 fl. oz. per hundredweight of seed.

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If the seed has been pretreated with a fungicide, Imida E-Ag 5 F ST Insecticide may be applied on-farm as an over-treatment. In this case, dilution is necessary.

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Sorghum:

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Do NOT graze or feed livestock on treated areas for 45 days after planting.

For early season seedlings protection against injury by aphids (including Corn leaf, English grain, Greenbug, and Yellow sugar cane aphid), Chinch bugs, Fire ants, and Wireworms:

Apply 6.4 fluid ounces per hundredweight of seed prior to planting as a slurry treatment. For best results ensure thorough coverage.

For End-Use Application At Agricultural Establishments:

Shake Imida E-Ag 5 F ST Insecticide thoroughly before use and dilute 3.2 fluid ounces of Imida E-Ag 5 F ST Insecticide with water and/or an approved fungicide mixture. The final slurry rate should be adjusted to apply at a rate of 8-10 fl. oz. of diluted slurry per 50-pound bag of seed. Apply using an HCBT or Eight-Bag Batch Treater and treat one-half of seed with one-half of the slurry mix, then add the remaining seed and apply the remaining slurry. Mix until the seed is thoroughly covered.

Following the Imida E-Ag 5 F ST Insecticide application, apply 0.75 oz. of dry TALC per 50-pound bag of seed and allow it to distribute evenly on the seed.

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Cotton (delinted seed only):

NOTE: Regardless of the type of application (seed treatment, soil or foliar) do NOT apply more than 0.5 lbs. of Imida E-Ag 5 F ST Insecticide per acre per cropping cycle.

For seedling protection against early season thrips and aphids, and where the specific application rate is desired on an individual seed basis:

Apply at 0.375 mg. ai. per seed (do not apply more than 12.8 fl. oz. per hundred weight of seed) as a slurry treatment prior to planting. For best results be sure to obtain thorough coverage of the seed.

For all other pests:

Apply 12.8 fl. oz. per hundredweight of seed.

For End-Use Application At Agricultural Establishments:

Shake Imida E-Ag 5 F ST Insecticide thoroughly before use and for each 50-pound bag of seed dilute 6.4 fluid ounces of Imida E-Ag 5 F ST Insecticide with water and/or an approved fungicide mixture such as RTU®-VITAVAX® - Thiram or ALLEGIANCE® FL. Apply using an HCBT or Eight-Bag Batch Treater and treat one-half of seed with one-half of the slurry mix, then add the remaining seed and apply the remaining slurry. Mix until the seed is thoroughly covered.

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Sugar Beets:

For early season seedling protection against Whitefly, Aphids, Leafhoppers (including to reduce potential for spread of Curly top and Yellow mosaic virus due to aphid and leafhopper vectors), Root aphid, Thrips and Wireworms:

Apply 2.4-5.0 fluid ounces of Imida E-Ag 5 F ST Insecticide in or on a unit of pelleted sugar beet seed with a weight ratio of 2:1 pelleting mixture to raw seed (seed count 100,000 seed- approximately 1 kilogram by weight) as a commercial seed treatment.

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For raw seed (100,000 or approximately 1 kilogram by weight), apply directly to the seed as a film coat at a rate of 2.4 fluid ounces per unit of seed. NOTE: If rates exceed 2.4 fluid ounces per unit, the seed must be pelleted.

Sweet Corn:

Apply as a seed treatment at the rates recommended for the specific pest(s) listed below:

Pest	Application Rate (Fl. Oz. per CWT. of Seed)
Early season corn leaf aphid Flea beetle Seed corn maggot Wireworm	6.4
Early season corn leaf aphid Imported fire ant Seed corn maggot Wireworm	3.2-6.4
Imported fire ant	1.6-3.2

Seed corn maggot (seed protection)	
Wireworm (seed protection)	
Wireworm (seed protection)	0.8-1.6

Apply using commercial application equipment with the final slurry rate adjusted to apply a rate of 16-20 fl. oz. of dilute solution per hundredweight of seed.

Popcorn:

To provide early season protection of seedlings against injury by flea beetles:

Apply 6.4 fl. oz. per hundredweight of seed as a commercial seed treatment.

Soybean:

Do NOT graze or feed livestock on soybean forage or hay.

To protect planted seeds from damage caused by seed corn maggot, to reduce feeding damage caused by soybean aphids and over-wintering bean leaf beetles, and to help suppress the spread of certain viruses:

Apply 1.6-3.2 fl. oz. of Imida E-Ag 5 F ST per hundredweight of seed, using the higher rates listed for increased length of protection and / or severe insect infestation. This product may be used as an over-treatment.

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For early season protection of Adzuki Bean, Asparagus Bean, Broad Bean (succulent or dry), Catjang Bean, Chinese Longbean, Field Bean, Guar Bean, Jackbean, Kidney Bean, Lablab Bean, Lima Bean (succulent or dry), Moth Bean (succulent or dry), Mung Bean, Navy Bean, Pinto Bean, Rice Bean, Runner Bean, Snap Bean, Sword Bean, Tepary Bean, Urd Bean, Wax Bean, Yardlong Bean, Blackeyed Pea (succulent or dry), Chickpea, Cowpea (succulent or dry), Crowder Pea, Dwarf Pea, Edible-Pod Pea, English Pea, Field Pea, Garden Pea, Green Pea, Pigeon Pea (succulent or dry), Snow Pea, Southern Pea (succulent or dry), Sugar Snap Pea, Grain Lupin, Sweet Lupin, White Lupin, White Sweet Lupin, and Lentil[†] seedlings against wireworm, bean leaf beetle, imported fire ant, and aphid:

Apply 1.6-3.2 fl. oz. of Imida E-Ag 5 F ST per hundredweight of seed as a commercial seed treatment prior to planting.

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[†] Seed-and-pod vegetable seed treated in California must be shipped to other states for planting and can NOT be planted in California.

Carrot:

For early season protection of seedlings against seed corn maggot and wireworm:

Apply 6.4 fl. oz. per hundredweight of seed as a commercial seed treatment.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal

PESTICIDE STORAGE: Store in a cool place. Do not store in direct sunlight. Protect from freezing temperatures.

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 incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITION 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 should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences

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may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Etigra or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Etigra and Seller harmless for any claims relating to such factors.

Etigra 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 the Directions for Use. This warranty does not extend to the use of this product contrary to label instructions, or under conditions not reasonably foreseeable to or beyond the control of Seller or Etigra, and Buyer and User assume the risk of any such use. ETIGRA 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 allowed by state law, neither Etigra nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ETIGRA 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 ETIGRA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Etigra and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Etigra.

| Imida E-Ag 5 F ST Insecticide is not manufactured or distributed by Bayer CropScience, seller of Gaucho[®] 600 and Gaucho[®] Grande. Gaucho[®], RTU[®], and ALLEGIANCE[®] are trademarks of Bayer. Etigra[™] is a trademark of Etigra. VITAVAX[®] is a trademark of Crompton Corporation.

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PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
Email: www.PyxisRC.com

November 28, 2006

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Etigra – Imida E-Pro 5 F ST Insecticide (EPA Reg. No. 79676-25)
Submission of Change in Primary Brand Name Notification per PR Notice 98-10

Dear Ms. Eagle,

On behalf of Etigra please find the enclosed change in primary brand name notification per PR Notice 98-10 for Imidacloprid E-Pro 5 F ST Insecticide (EPA Reg. No. 79676-25). The new primary brand name is, "Imida E-Ag 5 F ST Insecticide".

In support of this notification, please find the following:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Imida E-Ag 5 F ST Insecticide labeling with changes tracked
3. One (1) copy of the Imida E-Ag 5 F ST Insecticide labeling with changes incorporated
4. Letter of Authorization

Please feel free to call me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

March 2, 2004

To Whom It May Concern:

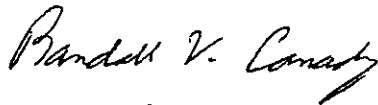
RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Gro-Pro, LLC (EPA Company Number 79676), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

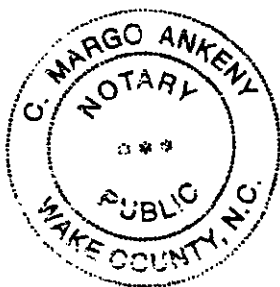
If you have any questions, please do not hesitate to contact me.

Sincerely,



Randall V. Canady
Vice President, Marketing and Business Development

cc: Pyxis Regulatory Consulting, Inc.



NOTARIZED ON THE 3RD DAY
OF MARCH, 2004
EXPIRES 10/16/07

