

79676-32

9.11.2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SEP 11 2007

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

RE: Notification of a Minor Label Revision - to add a Guaranteed Fertilizer Analysis table as optional text
EPA Registration Number: 79676-32
Date of Submission: August 7, 2007

Dear Mr. Kellogg:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated August 7, 2007, for the product Imida E-Pro 0.20% Insecticide plus Turf Fertilizer. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in cursive script that reads "Theresa Stone for".

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 79676-32	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 0.20% Insecticide plus Turf Fertilizer	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 minor label revisions per PRN 98-10. Etigra is adding a Guaranteed Fertilizer Analysis table to the Imida E-Pro 0.20% Insecticide plus Turf Fertilizer label. 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:				2. Type of Container	
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	<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 <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> 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	
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 8/7/07		

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer

A combination fertilizer / insecticide for use in turfgrass, landscape ornamentals and sod farms.

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine 0.2%

OTHER INGREDIENTS: 99.8%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you)

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 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.
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 or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

EPA Reg. No. 79676-32

EPA Est. No.

Manufactured for:

Etigra
501 Cascade Pointe Lane
Suite 103
Cary, NC 27513
www.etigra.com

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer contains imidacloprid, the active ingredient used in Merit®.

Net Weight:

PERSONAL PROTECTIVE EQUIPMENT (PPE)

WPS USES: Applicators and other handlers who handle this product for any use covered by the Worker Protection Standard (40 CFR part 170) – in general, agricultural plant uses e.g., use in sod farms, 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. 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 exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

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) - in general, only agricultural plant uses are covered by the WPS, must wear:

- Shirt and pants
- Gloves
- Shoes plus socks

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.

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 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.

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.

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

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.

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
- Shoes plus socks

GENERAL INFORMATION

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer is a systemic product absorbed by the roots and translocated upward within the plant, providing nutrients as well as control of selected insect pests. Best results are achieved when applications are followed by sufficient mechanical incorporation, irrigation or rainfall to move the active ingredient into the soil. For optimum levels of control, applications should be made prior to anticipated pest infestations.

General Use Restrictions

- Following application, avoid puddling or runoff of irrigation water.
- Avoid application of Imida E-Pro 0.20% Insecticide plus Turf Fertilizer to areas which are waterlogged or saturated. Saturated or waterlogged areas will not allow Imida E-Pro 0.20% Insecticide plus Turf Fertilizer penetration into the plant root zones.
- Do NOT apply more than 200 lbs. (0.4 lb. of active ingredient) per acre per year.
- Do NOT apply to vegetable gardens.

Application Equipment

Apply Imida E-Pro 0.20% Insecticide plus Turf Fertilizer uniformly over the area being treated with typical granular application equipment. Both drop-type and rotary-type spreaders may be used to apply Imida E-Pro 0.20% Insecticide plus Turf Fertilizer. Avoid the use of spreaders which would apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately.

[Note to Reviewer: The following text regarding spreader settings is optional text and may or may not be included on the final label. If spreader settings text is included on final label, spreader settings chart will also be included.]

Spreader Settings for Imida E-Pro 0.20% Insecticide plus Turf Fertilizer

The following chart can be used as a guide in establishing an accurate rate of Imida E-Pro 0.20% Insecticide plus Turf Fertilizer. The suggested settings should provide an application rate of 3.5 lbs. per 1000 sq. ft. or 150 lbs. per acre. Application rates will vary dependent upon speed, equipment wear and condition of spreader. Carefully calibrated all equipment used prior to commercial use of this product.

[Spreader Settings Chart]

TURFGRASS

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer may be applied on turfgrass in sites such as home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, athletic fields and sod farms to control the following soil inhabiting pests:

Asiatic garden beetle (<i>Maladera castanea</i>)	Annual bluegrass weevil (<i>Hyperodes</i> spp.)
European chafer (<i>Rizotrogus majalis</i>)	May or June beetles (<i>Phyllophaga</i>)
Japanese beetle (<i>Popillia japonica</i>)	Oriental beetle (<i>Anomala orientalis</i>)
Billbugs (<i>Sphenophorus</i> spp.)	Mole crickets (<i>Scapteriscus</i> spp.)
Black turfgrass ataenius (<i>Ataenius spretulus</i>)	<i>Aphodius</i> spp
European Crane Fly (<i>Tipula paludosa</i>)	
Northern & Southern masked chafers (<i>Cyclocephala borealis</i> , <i>C. immaculata</i> , <i>C. lurida</i>)	

Use Precautions

- Do NOT apply more than 200 lbs. (0.4 lb of active ingredient) per acre per year.
- Do NOT make applications when turfgrass areas are waterlogged or the soil is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist.
- Avoid mowing turf or lawn area until after irrigation or rainfall has occurred so that the uniformity of the application will not be affected. The treated turf must be in such a condition that the rainfall or irrigation will penetrate vertically into the soil profile.

Application Instructions

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer has sufficient residual activity to permit applications to be made preceding the egg laying activity of the target pests and high levels of control can be achieved when applications are made preceding or during the egg laying period. Historical monitoring of the site, previous records or experiences, current season adult trapping or other methods should be used to determine the need for an application. Best results occur when applications are made prior to egg hatch of the target pest followed by sufficient irrigation or rainfall to move the active ingredient through the thatch with optimum control if irrigation or rainfall occurs within 24 hours of application to move the active ingredient through the thatch. Irrigate treated areas following application to golf courses.

Pests Controlled	Application Rate	Instructions
Larvae of: Annual Bluegrass Weevil Asiatic Garden Beetle Billbugs Black Turfgrass Ataenius European Chafer European Crane Fly Japanese beetle Northern Masked Chafer Oriental Beetle <i>Phyllophaga</i> spp. Southern Masked Chafer	125 - 200 lbs. / acre (3-4.5 lbs. / 1000 sq. ft.)	Make application prior to egg hatch of the target pest for best results. Be sure to read the Application Equipment section of this label.
Mole Crickets	200 lbs. / acre (4.5 lbs. / 1000 sq. ft.)	Apply prior to or during the peak egg hatch period. If adults or large nymphs are present and actively tunneling, Imida E-Pro 0.20% Insecticide plus Turf Fertilizer applications should be accompanied by a curative insecticide.
For specific information regarding application timing, consult your local State Agricultural Experiment Station or State Extension Turf specialists.		

ORNAMENTALS

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer may be broadcast applied to ornamentals in commercial and residential landscapes as well as landscaped areas in golf courses and other recreational areas.

Use Precautions

- Do NOT apply more than a total of 200 lbs. (0.4 lb. of active ingredient) per acre per year.
- Do NOT use in commercial greenhouses or nurseries.

Pests Controlled	Application Rate	
White Grub Larvae such as: Japanese beetle larvae Chafers <i>Phyllophaga</i> spp. Asiatic garden beetle Oriental beetle	3.5 - 4.5 lbs. / 1000 sq. ft.	Apply as a broadcast treatment being sure that prior to application, black plastic or other weed barrier material that will not permit water to permeate the soil is removed. For best results, mechanical incorporation, irrigation or rainfall should occur within 24 hours of application in order to move the active ingredient into soil. Be sure to read the Application Equipment and Spreader Settings sections of this label.

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 material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides above. Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC (1-800-424-9300) 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 facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Dispose of empty bag in a sanitary landfill or by incineration or if allowed by the 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 must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences 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.

To the extent consistent with applicable law, 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 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 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 consistent with applicable 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-Pro 0.20% Insecticide plus Turf Fertilizer

A combination fertilizer / insecticide for use in turfgrass, landscape ornamentals and sod farms.

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 0.2%

OTHER INGREDIENTS:..... 99.8%

TOTAL:..... 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you)

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 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.
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 or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

EPA Reg. No. 79676-32

EPA Est. No.

Manufactured for:

Etigra
501 Cascade Pointe Lane
Suite 103
Cary, NC 27513
www.etigra.com

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer contains imidacloprid, the active ingredient used in Merit.

Net Weight:

PERSONAL PROTECTIVE EQUIPMENT (PPE)

WPS USES: Applicators and other handlers who handle this product for any use covered by the Worker Protection Standard (40 CFR part 170) – in general, agricultural plant uses e.g., use in sod farms, 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. 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 exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

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) - in general, only agricultural plant uses are covered by the WPS, must wear:

- Shirt and pants
- Gloves
- Shoes plus socks

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.

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 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.

DIRECTIONS FOR USE

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

AGRICULTURAL USE REQUIREMENTS

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

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
- Shoes plus socks

GENERAL INFORMATION

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer is a systemic product absorbed by the roots and translocated upward within the plant, providing nutrients as well as control of selected insect pests. Best results are achieved when applications are followed by sufficient mechanical incorporation, irrigation or rainfall to move the active ingredient into the soil. For optimum levels of control, applications should be made prior to anticipated pest infestations.

General Use Restrictions

- Following application, avoid puddling or runoff of irrigation water.
- Avoid application of Imida E-Pro 0.20% Insecticide plus Turf Fertilizer to areas which are waterlogged or saturated. Saturated or waterlogged areas will not allow Imida E-Pro 0.20% Insecticide plus Turf Fertilizer penetration into the plant root zones.
- Do NOT apply more than 200 lbs. (0.4 lb. of active ingredient) per acre per year.
- Do NOT apply to vegetable gardens.

Application Equipment

Apply Imida E-Pro 0.20% Insecticide plus Turf Fertilizer uniformly over the area being treated with typical granular application equipment. Both drop-type and rotary-type spreaders may be used to apply Imida E-Pro 0.20% Insecticide plus Turf Fertilizer. Avoid the use of spreaders which would apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately.

[Note to Reviewer: The following text regarding spreader settings is optional text and may or may not be included on the final label. If spreader settings text is included on final label, spreader settings chart will also be included.]

Spreader Settings for Imida E-Pro 0.20% Insecticide plus Turf Fertilizer

The following chart can be used as a guide in establishing an accurate rate of Imida E-Pro 0.20% Insecticide plus Turf Fertilizer. The suggested settings should provide an application rate of 3.5 lbs. per 1000 sq. ft. or 150 lbs. per acre. Application rates will vary dependent upon speed, equipment wear and condition of spreader. Carefully calibrate all equipment used prior to commercial use of this product.

[Spreader Settings Chart]

TURFGRASS

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer may be applied on turfgrass in sites such as home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, athletic fields and sod farms to control the following soil inhabiting pests:

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Japanese beetle (<i>Popillia japonica</i>)	Oriental beetle (<i>Anomala orientalis</i>)
Billbugs (<i>Sphenophorus</i> spp.)	Mole crickets (<i>Scapterisus</i> spp.)
Black turfgrass ataenius (<i>Ataenius spretulus</i>)	<i>Aphodius</i> spp.
European Crane Fly (<i>Tipula paludosa</i>)	
Northern & Southern masked chafers (<i>Cyclocephala borealis</i> , <i>C. immaculata</i> , <i>C. lurida</i>)	

Use Precautions

- Do NOT apply more than 200 lbs. (0.4 lb of active ingredient) per acre per year.
- Do NOT make applications when turfgrass areas are waterlogged or the soil is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist.
- Avoid mowing turf or lawn area until after irrigation or rainfall has occurred so that the uniformity of the application will not be affected. The treated turf must be in such a condition that the rainfall or irrigation will penetrate vertically into the soil profile.

Application Instructions

Imida E-Pro 0.20% Insecticide plus Turf Fertilizer has sufficient residual activity to permit applications to be made preceding the egg laying activity of the target pests and high levels of control can be achieved when applications are made preceding or during the egg laying period. Historical monitoring of the site, previous records or experiences, current season adult trapping or other methods should be used to determine the need for an application. Best results occur when applications are made prior to egg hatch of the target pest followed by sufficient irrigation or rainfall to move the active ingredient through the thatch with optimum control if irrigation or rainfall occurs within 24 hours of application to move the active ingredient through the thatch. Irrigate treated areas following application to golf courses.

Pests Controlled	Application Rate	Instructions
Larvae of: Annual Bluegrass Weevil Asiatic Garden Beetle Billbugs Black Turfgrass Ataenius European Chafer European Crane Fly Japanese beetle Northern Masked Chafer Oriental Beetle <i>Phyllophaga</i> spp. Southern Masked Chafer	125 - 200 lbs. / acre (3-4.5 lbs. / 1000 sq. ft.)	Make application prior to egg hatch of the target pest for best results. Be sure to read the Application Equipment section of this label.
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For specific information regarding application timing, consult your local State Agricultural Experiment Station or State Extension Turf specialists.		

ORNAMENTALS

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- Do NOT use in commercial greenhouses or nurseries.

Pests Controlled	Application Rate	Instructions
White Grub Larvae such as: Japanese beetle larvae Chafers <i>Phyllophaga</i> spp. Asiatic garden beetle Oriental beetle	3.5 - 4.5 lbs. / 1000 sq. ft.	Apply as a broadcast treatment being sure that prior to application, black plastic or other weed barrier material that will not permit water to permeate the soil is removed. For best results, mechanical incorporation, irrigation or rainfall should occur within 24 hours of application in order to move the active ingredient into soil. Be sure to read the Application Equipment and Spreader Settings sections of this label.

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 material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides above. Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC (1-800-424-9300) 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 facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Dispose of empty bag in a sanitary landfill or by incineration or if allowed by the 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 must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences 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.

To the extent consistent with applicable law, 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 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 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 consistent with applicable 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-Pro 0.20% Insecticide plus Turf Fertilizer is not manufactured or distributed by Bayer Environmental Science, seller of Merit®.

Merit® is a trademark of Bayer.

Etigra™ is a trademark of Etigra.

[Optional Text]

X-X-X	
GUARANTEED FERTILIZER ANALYSIS	
TOTAL NITROGEN (N)	XX.XX%
XX.XX% Ammoniacal Nitrogen	
XX.XX% Urea Nitrogen	
XX.XX% Water Insoluble Nitrogen	
AVAILABLE PHOSPHATE (P2O5).....	XX.XX%
SOLUBLE POTASH (K2O).....	XX.XX%
TOTAL SULFUR (S)	XX.XX%
XX.XX% Free Sulfur (S)	
XX.XX% Combined Sulfur (S)	
IRON (Fe).....	XX.XX%
MANGANESE (Mn)	XX.XX%
MANGESIUM (Mg)	XX.XX%
ZINC (Zn)	XX.XX%
COPPER (Cu).....	XX.XX%
DERIVED FROM: XXXXX, XXXXX, XXXXX, XXXXX.	
CHLORINE (Cl) Max.	XX.XX%
* XX.XX% Slowly Available Nitrogen From XXXXXXXXXX.	



January 14, 2007

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 doing business as Etigra (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
Chief Operating Officer

cc: Pyxis Regulatory Consulting, Inc.



PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

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

August 7, 2007

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 0.20% Insecticide plus Turf Fertilizer (EPA Reg. No. 79676-32)
Notification of Minor Label Revisions per PR Notice 98-10

Dear Ms. Eagle,

On behalf of Etigra please find the enclosed notification of minor label revisions per PR Notice 98-10 for Imida E-Pro 0.20% Insecticide plus Turf Fertilizer (EPA Reg. No. 79676-32). Etigra is adding a Guaranteed Fertilizer Analysis table as optional text to the Imida E-Pro 0.20% Insecticide plus Turf Fertilizer label. No other changes to the labeling have been made.

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-Pro 0.20% Insecticide plus Turf Fertilizer labeling with changes tracked
3. One (1) copy of the Imida E-Pro 0.20% Insecticide plus Turf Fertilizer 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