

79676-68

3.21.2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Michael Kellogg, Agent
Pyxis Regulatory Consulting, Inc.
4110 13th. St. NW
Gig Harbor, WA 98332

MAR 21 2008

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request General Label Change
EPA Reg. No. 79676-68
Application Dated March 3, 2008

Dear Mr. Kellogg:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 03/03/08 for the above product. The Registration Division (RD) has conducted a review 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 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 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

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PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

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

March 3, 2008

COURIER DELIVERY

Venus Eagle (PM 1)
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 4 F - Pre/Post Construction Insecticide (EPA Reg. No. 79676-68)
Notification of a Minor Label Revision per PR Notice 98-10 to Facilitate Registration in the
States of Tennessee and Texas

Dear Ms. Eagle,

On behalf of Etigra please find the enclosed label notification per PR Notice 98-10 revising the phrase "impervious material" on pg. 2 of the enclosed label with "suitable sealant (impervious material)" to facilitate registration in the states of Texas and Tennessee. Etigra believes this change qualifies as a notification since revising the phrase "impervious material" to "suitable sealant (impervious material)" does not change how the product is to be used (i.e., change the directions for use). No other changes to the labeling have been made.

In support of this notification, we submit the following documents:

1. Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Imida E-Pro 4 F - Pre/Post Construction Insecticide labeling with changes tracked
3. One (1) copy of the Imida E-Pro 4 F - Pre/Post Construction Insecticide labeling with changes incorporated
4. Letter of Authorization

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

Sincerely,



Michael Kellogg

Enclosures

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United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 79676-68	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 4 F - Pre/Post Construction 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 minor label revision per PR Notice 98-10 to facilitate state registrations in Texas and Tennessee. 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 3/3/08	

Imida E-Pro 4 F - Pre/Post Construction Insecticide

For use by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your State prior to use of this product.

For prevention or control of subterranean termites

ACTIVE INGREDIENT:

Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine40.7%

OTHER INGREDIENTS:59.3%

TOTAL:100.0%

Contains 4 pounds of imidacloprid per gallon.

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender inglés, 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 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.
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.	

See inside label booklet for additional PRECAUTIONARY STATEMENTS.

EPA Reg. No. 76976-68

EPA Est. No.

Manufactured for:

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

Imida E-Pro 4 F - Pre/Post Construction Insecticide contains imidacloprid, the active ingredient used in Premise®.

Net Contents:

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. Keep children or pets away from treated area until dry.

When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All pesticide handlers (mixers, loaders, and applicators) must wear long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinylchloride (PVC) or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks, and shoes must be worn. In addition, all pesticide handlers must wear protective eyewear when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injection.

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.

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

DIRECTIONS FOR USE

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

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

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

Use Precautions:

- Plug and fill holes drilled in concrete slab areas of the building with a suitable sealant (impervious material) after treatment.
- Do NOT apply until the location of all heat pipes, ducts, electrical conduits and water and sewer lines are identified.
- Do NOT plant edible plants for consumption in soil that has been treated.
- Do NOT contaminate public or private water supplies, wells and cisterns.
- ALL leaks of Imida E-Pro 4 F - Pre/Post Construction Insecticide applications into areas not prescribed on this label must be cleaned up prior to leaving the application site. Do NOT allow people or pets to come into contact or to reoccupy contaminated areas until clean up is completed.

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- All filling hoses must have an air gap or use anti-backflow equipment.
 - When applying in close proximity to potable water supplies, consult state, Federal or local authorities for information regarding approved treatment practices.
 - When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed.
 - The applicator should take into account structural design considerations and potential post-application effects from heating, ventilation and air conditioning systems (HVAC) when applying Imida E-Pro 4 F - Pre/Post Construction Insecticide indoors.
 - The applicator should take into account soil type, soil compaction, grade conditions, utilities and location and type of domestic water supply when applying Imida E-Pro 4 F - Pre/Post Construction Insecticide outdoors.
 - Be sure to use anti-backflow equipment or procedures to prevent siphonage of this product into water supplies in order to prevent contamination of public and private water supplies.
 - Do not treat soil that is water saturated or frozen or in any conditions where runoff or movement from the treatment area (site) is likely to occur.
 - Do not treat while precipitation is occurring.
 - Do not apply to effluent discharge systems such as leach beds, French drains or sumps.
 - Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.
 - All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material. Note: Crawlspace are to be considered inside of the structure.

INFORMATION

Imida E-Pro 4 F - Pre/Post Construction Insecticide may be applied as an insecticidal barrier to control and prevent infestations of subterranean termites in and around structures and constructions. In order to establish a barrier between the structure and the termites in the soil, the insecticide emulsion must be adequately dispersed in the soil.

For best results, applicators must be familiar with current termite control practices. These practices include trenching, rodding, sub-slab injections, coarse fan spraying of soil surfaces, crack and crevice (void) injection, and excavated soil treatment. Determining which control practices to use is dependent upon the biology and behavior of the species involved.

Proper application of Imida E-Pro 4 F - Pre/Post Construction Insecticide will provide a continuous barrier between the wood and other cellulose material in the structure and the termite colonies in the soil. In some instances where an aerial or an above ground colony is established, supplemental treatments to control the termites, landscape modifications, and / or structural repairs may be needed to deprive the termites of a moisture source.

The standards for subterranean termite control may vary due to regulations, treatment procedures, soil types, construction practices and other factors. Be sure to follow all federal, state and local regulations and treatment standards for protection of structures from termites. Based on local recommendations, use a 0.05% for typical situations and a 0.10% dilution in cases of severe or persistent infestations.

MIXING DIRECTIONS

1. Fill tank $\frac{1}{4}$ to $\frac{1}{3}$ full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of Imida E-Pro 4 F - Pre/Post Construction Insecticide (see table below).
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

Mix Imida E-Pro 4 F - Pre/Post Construction Insecticide with water only using the chart below:

Desired Concentration	Water (Gallons)	Imida E-Pro 4 F - Pre/Post Construction Insecticide (fl. oz.)
0.05%	1	0.15
	2	0.30
	5	0.75
	10	1.50
	25	3.45
	50	6.90
	100	13.75
0.10%	1	0.30
	2	0.60
	5	1.50
	10	3.00
	25	6.90
	50	13.75
	100	27.50

Unit Conversions: 1 pint = 16 fluid ounces (oz.); 1 gallon = 4 quarts = 8 pints = 128 fluid ounces (oz.)

APPLICATION INSTRUCTIONS

Refer to the appropriate section below for specific application instructions. For best results, remove all non-essential wood and cellulose containing material from around crawlspaces, foundation walls, and porches.

In order to eliminate termite access to moisture, repair faulty plumbing and/or construction grade.

NOTE – Definition of Critical Areas: Critical areas include areas where the foundation is penetrated by utility services, cracks and expansion joints, bath traps and areas where cement constructions have been poured adjacent to the foundation as stairs, patios and slab additions.

Application Volume: To provide maximum control and protection against termite infestation, apply the specified volume of the finished water emulsion and active ingredient as set forth in the directions for use section of this label. If soil will not accept the labeled application volume, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the ability to obtain a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved.

FOAM APPLICATIONS

Imida E-Pro 4 F - Pre/Post Construction Insecticide may be converted to a foam and depending on circumstances, used alone or in combination with other techniques listed above to control and prevent

termite infestation. When used in combination, at least 75% of the gallons of Imida E-Pro 4 F - Pre/Post Construction Insecticide must be applied as a typical liquid treatment. The remaining 25% or less gallons may be applied as foam to appropriate locations.

Use Precautions:

- When applying the product as a foam application in combination with another method of treatment, do NOT exceed the maximum-labeled application rate.
- Be sure to exercise care and safety around electrical utilities. Note location of electrical sources prior to foaming voids to avoid possible shock hazard.

Mixing Instructions:

To generate a 0.05% solution, mix the recommended amount of Imida E-Pro 4 F - Pre/Post Construction Insecticide (from table below) in water and add the manufacturer's recommended amount of foam agent to the solution.

Finished Foam (gallons)	Imida E-Pro 4 F - Pre/Post Construction Insecticide (fl. oz.)	Water (gallons)	Foam Expansion Ratio
25	3.45	1	25:1
		2.5	10:1
		5	5:1
50	6.90	1	50:1
		2.5	20:1
		5	10:1

Application Instructions:

Foam may be used to treat voids to control or prevent localized infestations of termites and carpenter ants harboring in voids. Application may be made to voids such as: behind veneers, piers (concrete or wood), chimneys, into rubble and stone foundations, into block voids, structural voids (i.e., between stud walls), poles, stumps, and wood in crawlspaces using either the foam alone or in combination with liquid emulsion. Be sure to note the location of electrical sources prior to foaming voids in order to avoid possible shock hazard.

PRE-CONSTRUCTION SUBTERRANEAN TERMITE CONTROL

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

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

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

Horizontal Barriers: Horizontal barriers must be created wherever treated soil will be covered, such as concrete slabs and footings, porches, stairs and crawlspaces.

For a 0.05% application rate, apply 1 gallon of dilution per 10 square feet. If the fill is washed gravel or other coarse material, use a rate of 1.5 gallons of a 0.05% emulsion per 10 square feet. Use a low-pressure spray (no more than 25 psi) and a coarse spray nozzle to make the application. In addition to the above application, apply 4 gallons of solution per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services and other features that will penetrate the slab.

Vertical Barriers: Vertical barriers must be created around the base of foundations, utility entrances, plumbing, back-filled soil against foundation walls and other critical areas. After completion of grading, apply by trench or trenching and rodding around the slab or foundation perimeter. Apply 4 gallons of solution per 10 linear feet per foot of depth using a low pressure (no more than 25 psi) spray to treat soil which will be placed in the trench after rodding. Be sure to mix the spray solution with the soil when it is being placed in the trench.

- For best results the emulsion must reach the top of the footing when trenching or trenching and rodding into the trench. Rod holes must be spaced so as to achieve a continuous termiticide barrier and should never be more than 12 inches apart.
- Rod holes must not extend below the footing.
- Avoid soil washout around the footing.
- Trenches do not need to be wider than 6 inches.
- The emulsion should be mixed with the soil as it is being replaced in the trench.
- An inside vertical barrier may not be necessary for monolithic slabs.

NOTE: Best results may be achieved by rodding in trench followed by flooding of the trench and treatment of backfill as opposed to using soil rodding alone to establish a vertical termiticide barrier.

Crawl Spaces: For crawl spaces, apply vertical termiticide barriers at the rate of 4 gallons of emulsion per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions, such as concrete walkways adjacent to foundation elements, prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

- 1) Rod holes and trenches must not extend below the bottom of the footing.
- 2) Rod holes must be spaced so as to achieve a continuous chemical barrier but in no case more than 12 inches apart.
- 3) Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The emulsion must be mixed with the soil as it is replaced in the trench.

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

Hollow Block Foundations or Voids: Apply to hollow block voids using a rate of 2 gallons of emulsion per 10 linear feet and be sure that the application reaches the top of the footing or soil. As a precaution against application leakage in the treated areas, applicators must closely examine treatments of voids in block or rubble foundation walls and inspect areas of potential runoff. Note that some areas may not be treatable or may require alteration prior to treatment.

POST-CONSTRUCTION SUBTERRANEAN TERMITE CONTROL

For post-construction treatment, apply Imida E-Pro 4 F - Pre/Post Construction Insecticide by injection, trenching, rodding into the trench or coarse fan spray.

Use Precautions

- Do NOT make treatments until the locations of all heat and / or air conditioning ducts and vents are known and identified. **Use extreme caution to avoid contamination of ducts and vents.**
- In commonly occupied areas, plug and fill all holes drilled for application using a non-cellulose material or by covering the hole with a non-cellulose material.
- To avoid soil wash-out when injecting around the foundation, do not use pressures above 25 psi.
- Special care must be taken to distribute the treatment evenly.
- Treatment must NOT extend below the bottom of the footing.
- Wear respiratory protection when treating crawl spaces (NOTE: It is highly recommended that prior to treatment, inadequately ventilated crawl spaces be brought into compliance with FHA Minimum Property Standards specifying 1 square foot of ventilator opening per 150 square feet of crawl space area).

Foundations: Apply 4 gallons per 10 linear feet per foot of depth by trenching or trenching and rodding into the trench along the foundation walls and around pillars and other foundation elements from grade to the top of the footing. When trenching, the trench should be 6 inches deep by 6 inches wide. When the footing is more than 4 feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the location of termite activity, soil type and degree of compaction. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. In no case should a structure be treated below the footing.

Slabs: Vertical barriers may be established within the structure by sub-slab injection and outside the structure by trenching or rodding and trenching. Use a rate of 4 gallons of emulsion per 10 linear feet per foot of depth.

Make applications along the outside of the foundation and where necessary, beneath the slab on the inside of foundation walls. If necessary, treatments may also be made along all cracks and expansion joints, beneath the slab along both sides of interior-supported walls, and to one side of interior partitions.

Where necessary, horizontal barriers may be established by grid pattern injection or by long-rodding vertically through the slab using the following instructions:

- In order to form a continuous insecticidal barrier, drill holes in the slab and/or foundation no more than 12 inches apart.
- Treat all existing cracks and cold, construction or expansion joints.
- For shallow foundations (1 foot or less), dig a narrow trench approximately 6 inches wide and deep along the outside of the foundation walls being careful to not dig below the bottom of the footing. While replacing the soil in the trench, make the application at a rate of 4 gallons per 10 linear feet per foot of depth being sure to incorporate the emulsion completely into the soil.
- For foundations deeper than 1 foot, follow the rates listed for basements below.
- Exposed soil in bath traps may be treated using a 0.05% emulsion.

Basements: Sub-slab injection may be necessary along the inside of foundation walls, along cracks and partition walls, around pipes, piers, conduits, and along both sides of interior footing-supported walls.

When the footing is greater than 1 foot deep from grade to the bottom of the foundation, apply 4 gallons of emulsion per 10 linear feet per foot of depth by trenching and rodding into the trench or injecting.

When the footing is more than four feet below grade, apply using the same rate listed above by either trenching and rodding into the trench or trench along foundation walls at the rate prescribed for four feet of depth. Soil type, degree of compaction, and location of termite activity will determine the maximum depth of application.

- In order to form a continuous insecticidal barrier, rod holes must be no more than 12 inches apart.
- Do NOT treat any structure below the footing.

Bath Traps: Treat exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas with 3 gallons of emulsion per square foot. Cut and install an

access or inspection vent if not already present. After inspection and removal of any wood or cellulose debris, treat the soil by rodding or drenching.

Accessible Crawlspace: Apply vertical termiticide barriers at the rate of 4 gallons of emulsion per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. If situations are encountered where the soil will not accept the full application volume:

1. Rod holes and trenches must not extend below the bottom of the footing.
2. Rod holes must be spaced so as to achieve a continuous chemical barrier but in no case be more than 12 inches apart.
3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The emulsion must be mixed with the soil as it is replaced in the trench.
4. When treating plenums and crawlspaces, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Inaccessible Crawlspaces: For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate if possible, and treat according to the instructions for accessible crawlspaces. Otherwise, apply one or a combination of the following two methods:

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of emulsion per 10 square feet overall using a nozzle pressure of less than 25 psi and a coarse application nozzle. Use one or more extension rods to make the application to the soil for areas that cannot be reached with the application wand. Do not broadcast or powerspray with higher pressures.
2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of emulsion per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many States have smaller intervals; check State regulations that may apply.

NOTE: Turn off the air circulation systems of the structure until application has been completed and all termiticide has been absorbed by the soil when treating plenums and crawlspaces.

Masonry or Hollow Block Voids: Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing, using a nozzle pressure of less than 25 psi. Drill spacing must be at intervals not to exceed 16 inches (or smaller depending upon specific state regulations). When using this treatment, access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Care should be exercised not to drill entirely through and into the structure. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the cleanup is completed.

Plenums: Apply at a rate of 4 gallons of solution per 10 linear feet per foot of depth of soil for plenum-type structures that use a sealed underfloor space to heat and/or cool the air in the structure. Ensure the application is made to provide a uniform treated zone adjacent to the foundations walls (both sides), supporting piers, conduit, or plumbing by creating a 6 inch trench or by trenching and rodding (if conditions permit) to the top of the footing. Make a surface application at a rate of 1.5 gallons of emulsion

per 10 square feet as a very coarse spray under low pressure (no more than 25 psi when measured at the treating tool with the valve on) to the interior foundation wall if conditions do not permit trenching or rodding. Do not exceed an 18 inch wide treated strip horizontally from the foundation walls, piers or pipes.

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

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

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

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

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

1. Prior to treatment, if feasible, expose the water pipe(s) coming from the well to the structure, if the pipe(s) enter the structure within 3 feet of grade.
2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

NOTE: Consult state, local or federal agencies for information regarding approved treatment practices in your area prior to applying near wells or cisterns.

EXTERIOR PERIMETER / INTERIOR SPOT TREATMENTS

For post-construction applications where the final grade has been established, exterior perimeter and interior spot treatments may be made as an alternative preventative or curative method of termite control by establishing a continuous treated zone around the entire exterior foundation wall of the building and spot-treating infested areas on the building interior. Note that as described below, pre-construction applications made to protect new construction are not considered preventative treatment.

The entire perimeter of the structure (including under any attached slabs adjacent to the foundation) must be continuously treated, and all soil adjacent to the exterior foundation wall must be treated using the same techniques as a standard full application.

Exterior perimeter treatments must then be followed by interior spot treatments made to any indoor areas where termite activity is present. High-risk areas (such as plumbing and utility penetrations, expansion joints, settlement cracks and dirt-filled porches) can also receive interior spot treatments.

Prior to treating, all areas of active infestation must be identified by conducting a comprehensive inspection of the structure and if no termite activity is found within the structure, interior spot treatments are not required. Once identified, all termite activity sites must be spot treated.

NOTE: Be sure to use the recommended rates. Do NOT apply at a rate lower than specified.

EXTERIOR PERIMETER TREATMENTS

A vertical treated zone along the outer perimeter of the foundation wall must be established for all structures regardless of construction type.

OUTER FOUNDATION WALLS – Application must be made around the outside of the foundation walls by trenching or by trenching and rodding from the bottom of the trench (where appropriate). When trenching, excavate a trench along the outside foundation that is about 6 inches wide and 6 inches deep. NOTE: When the soil adjacent to an outer foundation wall is inaccessible due to attached slabs such as garages or porches, refer to the CONCRETE SLAB ON GROUND section below.

Foundation Type	Rate	Instructions
Shallow (1' or less)	Four gallons of solution per 10 linear feet per foot of depth.	Dig a narrow trench (no more than 6" wide by 6" deep) along the outside of the foundation walls. For foundations with exposed footings, dig a trench alongside the footing. Note: Do not undermine the footing.
Basements or Foundations Deeper than 1'		Trenching and rod from the bottom of a shallow trench. Rod holes must be spaced (no more than 12 inches apart) to create a continuously treated zone and must not extend below the footing. The rodding depth should be to the top of the footer, or to a maximum depth of 4 feet, or to a depth dictated by state or local regulations.
For obstructions adjacent but not attached to the foundation or Where soil type and/or conditions prevent trenching		Obstructed exterior perimeter treatments may be performed by rodding without trenching. Rod holes must be spaced (no more than 12 inches apart) to create a continuously treated zone and must not extend below the footing.
For all applications, apply the solution into the trench and mix with the excavated soil as it is replaced into the trench. Use a low pressure spray to treat soil that will be replaced into the trench after rodding. Mix spray solution with the soil as it is being replaced in the trench.		

CONCRETE SLAB ON GROUND – It is necessary to drill through slabs when treating the soil beneath a slab structure abutting the foundation wall (such as carports, garages, attached porches, etc). Infestations through an expansion joint, crack, utility penetration or similar access point in the slab must also be treated by drilling and injecting through the slab. Space the drill holes to create a continuous chemical treated zone that extends a minimum of 3 feet to both sides of the infested site. Apply 4 gallons of solution per 10 linear feet. After application, all drilled holes in commonly occupied areas must be filled and plugged with a non-cellulose material or covered by an impervious, non-cellulose material.

Caution: Use extreme caution to avoid contamination of ducts and vents. Do NOT apply until the locations of all heat or air conditioning ducts and vents in the vicinity of the application area are known.

INACCESSIBLE CRAWL SPACES – When termite activity is encountered within an inaccessible crawl space along a perimeter wall or on a pier, create a vertical treated zone that extends a minimum of 3 feet to both sides of the infested area by applying 4 gallons of solution per 10 linear feet.

Optional Directions for Horizontal Rodding: Treatment in inaccessible crawl spaces may also be made by drilling through the foundation wall or the floor above (at intervals not to exceed 16 inches) and treating

the soil along the perimeter wall using a rate of 4 gallons of solution per 10 linear feet. Note: Many states require closer injection hole spacing, check state regulations that may apply.

To prevent subterranean termites from constructing mud tubes between soil in the crawl space and wooden elements in the structure when termite activity is neither along the perimeter wall nor on a pier within the inaccessible crawl space, make an overall soil treatment using this product. Be sure to remove all cellulose debris and apply 1 gallon of solution per 10 square feet uniformly over the surface.

ACCESSIBLE CRAWL SPACES – For termite activity in an accessible crawl space, treat along the interior foundation walls, around piers, interior supports in contact with the soil, plumbing, or utility services by trenching alone or trenching and rodding from the bottom of the trench. Create a vertical treated zone by applying 4 gallons of solution per 10 linear feet per foot of depth, being sure to extend a minimum of 3 feet to both sides of the infested area.

Rodding may be done to a minimum depth of 4 feet or from the bottom of a shallow trench to the top of the footing with the rod holes spaced to create a continuous treated zone (no more than 12 inches apart). Rod holes must not extend below the footing.

When trenching, dig a narrow trench about 6 inches wide and 6 inches deep. Treat the soil that will be placed in the trench using a low-pressure spray and mix the spray solution with the soil as it is being placed in the trench.

INTERIOR SPOT TREATMENTS

Use one or more of the following application methods to treat all known infested sites within a structure:

Method	Instructions
Sub-slab Injections	Inject through the slab at or near areas where termites are known to be penetrating the slab and/or at or near sites of active infestations using 4-gallons per 10 linear feet per foot of depth. Applications to expansion joints or cracks in slabs must extend a minimum of 3 feet to either side of every known infested site.
Void Treatments	Inject sprays, mists or foams into above ground structural voids, termite carton nests, and other infested locations.
Wood Treatments	To treat active infestations in structural timbers, inject and/or surface apply. Use of foam and directional dispersion tips is recommended for all interior spot treatments in order to maximize dispersion of treatment solution in soil and above ground locations. Refer to the FOAM APPLICATIONS section of this label for additional information.

INTERIOR SLABS – Termite activity located within an interior wall or structural member requires the soil beneath the slab as well as the wall void at the site of activity be treated. The source of infestation through an expansion joint, crack, utility penetration or similar access point in the slab must also be treated by drilling and injecting through the slab. Space the drill holes to create a continuous chemical treated zone that extends a minimum of 3 feet to both sides of the infested site. Apply 4 gallons of solution per 10 linear feet. Use of foam and directional dispersion tips is recommended. After application, all drilled holes in commonly occupied areas must be filled and plugged with a non-cellulose material or covered by an impervious, non-cellulose material.

To treat wall voids, refer to the FOAM APPLICATIONS section of this label.

Caution: Use extreme caution to avoid contamination of ducts and vents. Do NOT apply until the locations of all heat or air conditioning ducts and vents in the vicinity of the application area are known.

HOLLOW BLOCK FOUNDATION OR MASONRY VOIDS – Spot treat sites of termite activity located within hollow-block foundations or masonry being sure to extend the treatment a minimum of 3 feet to both sides of the infested site. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil using a drill spacing in masonry voids of 16 inches or less. Note: Many states require closer injection hole spacing, check state regulations that may apply. Using foam and directional dispersion tips is recommended for maximum dispersion of treatment solution in voids.

When treating structural voids in masonry above sites of termite activity, refer to the FOAM APPLICATIONS section of this label for additional information. Any applications to voids in block or rubble foundation walls must be closely examined for leaks from treated areas, and some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up by the applicator prior to leaving the application site (refer to Precautionary Statements). Until clean up is completed, people and pets must not be allowed to come into contact with or to reoccupy contaminated areas of the structure.

BATH TRAPS – If termite activity is observed within 2 feet of a bath trap, the exposed soil or soil covered with tar or a similar type of sealant around plumbing and/or drain pipe entry areas must be treated. For adequate soil treatment, an access door or inspection portal should be installed if one is not present and tar or sealant may have to be removed. After inspection and removal of any wood or cellulose debris, treat the soil by rodding or drenching the soil using no less than 3 gallons of solution per square foot.

SHOWER OR FLOOR DRAINS - If termite activity is observed within 2 feet of a shower or floor drain in the slab, the soil beneath the drain must be treated by drilling through the slab adjacent to the drain and using a sub-slab injection to apply solution to the soil at a rate of 1 gallon of solution per square foot. If necessary, multiple access points may be drilled adjacent to the drain to ensure coverage.

RETREATMENT

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

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this labeling. The timing and type of retreatments will vary depending on factors such as soil types, soil conditions, termite pressure and other factors that may reduce the effectiveness of the barrier.

Retreatment may be performed when a structure is not known to be reinfested and the treated area is not disturbed, ONLY if the structure was last treated five or more years ago and in the judgment of the applicator it is necessary to ensure adequate protection of the structure.

PERIMETER PEST CONTROL

Use Precautions:

- Do NOT use this product against native or imported fire ants, pharaoh, or harvester ants.
- Do NOT allow residents or pets in to the immediate application sites during the application or into treated areas until the application has dried.
- Retreat no more than once per month to maintain control.

To control ants in houses and other structures, apply a 0.05 to 0.10% solution as a surface, spot, crack, crevice or wall void application. Imida E-Pro 4 F - Pre/Post Construction Insecticide may be applied where pests enter structures or crawl or hide on buildings, porches, patios and other structures, around doors and windows, eaves and attic vents, utility entry points, soffit areas and other exterior openings including foundation cracks or drilled holes. Spray into the cracks or crevices where ants or their nests are present. Apply to the point of wetting the entire area but not to the point of dripping or runoff from vertical or overhead surfaces.

When ants are trailing or may find food or shelter, treat soil, turf or groundcover using a 0.05 to 0.10% solution sprayed onto the surfaces. For tunneling ants in soil, apply as a drench or soil injection at intervals to create a continuously treated zone. Treat along the edge of walls, driveways or other hard surfaces where ants are tunneling below the surface.

For aerial nests in tree hollows or non-structural wooden construction such as posts, fences and decks, treat the interior cavities and / or the nest site with an 0.05 to 0.10% solution as a spray, mist or foam.

NOTE: In the case of severe pest pressure or when rapid knockdown is desired, supplement Imida E-Pro 4 F - Pre/Post Construction Insecticide treatments with targeted applications of a pyrethroid such as TEMPO® SC ULTRA or SUSPEND® SC to doors and windows, utility entry points and other places where the pests enter the structure. Be sure to read and follow the label instructions on all companion products used.

Imida E-Pro 4 F - Pre/Post Construction Insecticide may be used as a secondary treatment when another registered termite control product / system is used as the primary treatment for prevention and / or control of subterranean termites. Apply as a spot treatment to critical areas of the structure such as utility and plumbing entry sites, bath traps, expansion joints, foundation cracks and areas with known or suspected infestations. See the Post-Construction treatment section of this label for specific application instructions.

STORAGE AND DISPOSAL

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

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

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying. 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.

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.

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. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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 laws, neither Etigra or Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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 4 F - Pre/Post Construction Insecticide is not manufactured or distributed by Bayer Environmental Science, seller of Premise®. Premise®, Suspend® and Tempo® are trademarks of Bayer. Etigra® is a trademark of Etigra.

EPA 20080303



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.