

81598-5

10/26/2007

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

OCT. 26 2007

Dr. Frank E. Sobotka  
IPM Resources LLC  
660 Newtown-Yardley Road  
Suite 105  
Newtown, PA 18940

Subject: Updates for Technical Label  
Rotam Insecticide Technical  
EPA Reg. No. 81598-5  
Your Submission date, August 1, 2007

Dear Dr. Sobotka:

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

1. Page 3 of the label, add the word **only** at the end of the sentence under the **Greenhouse Vegetables** section.
2. Also, on page 3, change the section entitled **Head and Stem Brassica Vegetables** to read **Brassica (Cole) Leafy Vegetables** in order to maintain consistency with the parent label.
3. Further, on page 3, delete **tops (leaves)** as it is not support on the parent label.
4. Lastly, on page 3 change the section entitled **Leafy Vegetables** to read **Leafy Green Vegetables**. Also, remove **Cilantro** from this group as it in not support on the parent label.
5. Page 4 remove **Tangelo** after (sweet and sour) under the **Citrus (Field and Containerized)** section to keep in consistency with the parent label.

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A stamped copy is enclosed for your records. Submit two (2) copies of your final printed labeling before you release the product for shipment. If there are questions call me at 703 305-5409.

Sincerely,



Dani Daniel  
Insecticide-Rodenticide Branch  
Registration Division 7505C

Enclosure:

# Rotam Imidacloprid Technical

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For Formulation Use Only

**ACTIVE INGREDIENT:**

IMIDACLOPRID\*.....98.0%  
Other Ingredients.....2.0%  
Total.....100.0%

\* (CASRN: 138261-41-3)

EPA Reg. No. 81598 - 5

EPA Est. No.: 069821-CHN-005

## KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID	
If In Eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
If On Skin Or Clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
If Inhaled	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li><li>• Call poison control center or doctor for treatment advice.</li></ul>
If Swallowed	<ul style="list-style-type: none"><li>• Call poison control center or doctor for treatment advice.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>NOTE TO PHYSICIAN</b> No specific antidote. Treat symptomatically.	
<b>HOT LINE NUMBER</b> Have the product container or label with you when calling a poison control center or doctor or going for treatment. <b>For emergency information, call your local poison control center for assistance.</b>	

SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON LABEL.

Manufactured by:  
Rotam LTD  
7/F., Cheung Tat Centre  
18 Cheung Lee Street  
Chai Wan, Hong Kong

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

OCT 26 2007

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.

81598-5

NET CONTENTS: TBA  
GROSS WEIGHT: TBA

**PRECAUTIONARY STATEMENTS**  
**Hazardous to Humans and Domestic Animals**

**WARNING.** May cause substantial but temporary eye injury. Avoid contact with Skin. May be fatal if inhaled. Harmful if swallowed, or absorbed through skin. May be fatal if swallowed. Do not breathe dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and warm water after handling and before eating, drinking or using tobacco products. Remove contaminated clothing and wash before reuse.

**Environmental Hazards**

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirement of a National Pollutant Discharge Elimination System (NPDES) permit and permitting authority has been notified in writing prior to the discharge. Do not discharge effluent containing the product to sewer system without previously notifying the local sewage treatment plant authority. For guidance contact your local state water board or regional office of the EPA.

**DIRECTIONS FOR USE**

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

**INSTRUCTIONS TO FORMULATORS:**

This technical product may be used for the manufacture of fungicidal products for the following uses:

Formulators using this product are responsible for obtaining Environmental Protection Agency Registration for their formulated products.

**TERRESTRIAL FOOD CROP INCLUDING DOMESTIC FOOD**

FIELD CROPS:

Cotton, Potato (Incl. Seed Piece Treatment), Tobacco.

VEGETABLE and SMALL FRUIT CROPS (Field and Planthouse):

CUCURBIT VEGETABLES Including: Chayote (fruit), Chinese waxgourd (Chinese preserving melon), Citron melon, Cuban pumpkin, Cucumber, Gherkin, Gourd (edible, includes hyotan, cucuzza, hechima, Chinese okra), *Momordica* spp. (includes balsam apple, balsam pear, bitter melon, Chinese cucumber), Muskmelon (hybrids and/or cultivars of *Cucumis melo* including true cantaloupe, cantaloupe, casaba, Crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango

**Rotam Imidacloprid Technical**

melon, Persian melon, pineapple melon, Santa Claus melon, snake melon and Winter melon), Pumpkin, Squash (includes summer squash types such as: butternut squash, calabaza, crookneck squash, Hubbard squash, scallop squash, straightneck squash, vegetable marrow and zucchini, and winter squash types such as acorn squash and spaghetti squash), Watermelon (includes hybrids and/or varieties of *Citrullus lanatus*).  
HERBS Including: Angelica, Balm (lemon balm), Basil (fresh and dried), Borage, Bumet, Camomile, Catnip, Chervil (dried), Chinese chive, Chive, Clary, Coriander (cilantro or Chinese parsley leaves), Costmary, Culantro (leaf), Curry (leaf), Dillweed, Horehound, Hyssop, Lavender, Lemongrass, Lovage (leaf), Marigold, Marjoram, Nasturtium, Parsley (dried), Pennyroyal, Rosemary, Rue, Sage, Savory (summer and winter), Sweet bay (bay leaf), Tansy, Tarragon, Thyme, Wintergreen, Woodruff, Wormwood.

**GREENHOUSE VEGETABLES (Mature plants in production greenhouses)** Cucumber, Tomato.

**FRUITING VEGETABLES (Field and Planthouse)**

Eggplant, Ground cherry, Okra, Pepper (including bell, chili, cooking, pimento and sweet) Tomato, Pepinos, Tomatillo.

**HEAD and STEM BRASSICA VEGETABLES**

Broccoli, Broccoli raab (*rapini*), Brussels sprouts, Cabbage, Cauliflower, Cavalo broccoli, Chinese (*gai lon*) broccoli, Chinese (*bok choy*) cabbage, Chinese (*napa*) cabbage, Chinese mustard (*gai choy*) cabbage, Collards, Kale, Kohlrabi, Mizuna, Mustard greens, Mustard spinach, Rape greens, Turnip tops (leaves).

**LEAFY VEGETABLES**

Amaranth (leafy amaranth, Chinese spinach, tampala), Arugula (Roquette), Chervil, Chrysanthemum (edible leaved and garland), Cilantro, Corn salad, Cress (garden), Cress (upland, yellow rocket, winter cress), Dandelion, Dock (sorrel), Endive (escarole), Lettuce (head and leaf), Orach, Parsley, Purslane (garden and winter), Raddicchio (red chicory), Spinach (including New Zealand and vine (Malabar spinach, Indian spinach)), Watercress (commercial production only, applications must not be made to native cress growing in streams or other bodies of water), Watercress (upland).

**LEAFY PETIOLE VEGETABLES**

Cardoon, Celery, Celtuce, Chinese celery (fresh leaves and stalk only), Florence fennel (including sweet anise, sweet fennel, Finocchio), Rhubarb, Swiss chard.

**LEGUME VEGETABLES (Edible Podded and Succulent Shelled Pea and Bean and Dried Shelled Pea and Bean)**

Bean (*Lupinus spp.*, includes grain lupin, sweet lupin, white lupin, and white sweet lupin). Bean (*Phaseolus spp.*, includes field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary

bean, wax bean).

Bean (*Vigna spp.*, includes adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, Southern pea, urd bean, yardlong bean). Pea (*Pisum spp.*, includes dwarf pea, edible-pod pea, English pea, field pea, garden pea, green pea, snow pea, sugar snap pea) Other Beans and Peas [Broad bean (fava), Chickpea (garbanzo bean), Guar, Jackbean, Lablab bean (hyacinth bean), Lentil, Pigeon pea, Soybean (immature seed), Sword bean]

ROOT, TUBEROUS and CORM VEGETABLES

Arracacha, Arrowroot, Artichoke (Chinese and Jerusalem), Beet (garden), Burdock (edible), Canna (edible, Queensland arrowroot), carrot, Cassava (bitter & sweet), Celeriac, Chayote (root), Chervil (turnip-rooted), Chickory, Chufa, Dasheen (taro), Ginger, Ginseng, Horseradish, Leren, Parsley (turnip-rooted), Parsnip, Radish, Oriental radish (diakon), Rutabaga, Salsify (black), Salsify (oyster plant), Salsify (Spanish), Skirret, Sweetpotato, Tanier (cocoyam), Tumeric, Turnip, Yam bean (jicama, manioc pea), Yam (true).

ANNUAL AND PERENNIAL CROPS

Cranberry, Globe Artichoke, Hop, Strawberry, Sugarbeet,.

TREE, BUSH and VINE CROPS

Bushberry (Blueberry, Currant, Elderberry, Gooseberry, Huckleberry, Juneberry, Ligonberry, Salal), Grape (Including: American bunch grape, Muscadine grape and Vinifera grape).

BANANA and PLANTAIN

COFFEE

CITRUS (Field and Containerized)

Calamondin, Citrus citron, Citrus hybrids (includes chironja, tangelo, and tangor), Grapefruit, Kumquat, Lemon, Lime, Mandarin (tangerine), Pummelo, Orange (sweet and sour), Tangelo, Satsuma mandarin, White sapote (*Casimiroa spp*), and other cutivars and/or hybrids of these.

POME FRUIT

Apple, Crabapple, Loquat, Mayhaw, Pear (including Oriental pear), Quince.

POMEGRANATE

TREE NUTS

Almond, Beechnut, Beechnut, Brazil nut, Butternut, Cashew, Chestnut, Chinquapin, Filbert, Hickory nut, Macadamia nut, Pecan, Pistachio, Walnut [black and English]

STONE FRUIT

Apricot, Cherry (including sweet and tart), nectarine, Peach, Plum (including Chickasaw, Damson and Japanese), Plumcot, Prune (fresh and dried)

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### **TROPICAL FRUIT**

Acerola, Atemoya, Avocado, Birida, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Jaboticaba, Guava, Liama, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu

### **OUTDOOR RESIDENTIAL (For use only in and around commercial and residential areas)**

Pome Fruits, Apple, Crabapple, Grapes, Loquat, Mayhew, Pear, Pear(oriental), Quince  
Pecans.

### **TERRESTRIAL NON-FOOD CROP(INCLUDING DOMESTIC OUTDOOR)**

NURSERY(Commercial), ORNAMENTALS (trees, shrubs, evergreens, flowers, foliage plants, ground covers, (Including, field grown and plants grown in benches, shade houses, beds, containers(Incl. flats); woody and herbaceous Species; INTERIORSCAPES, PLANTSCAPES (Including, domestic residential plantings), INDUSTRIAL SITES, LAWN and TURF GRASSES.

### **FORESTRY**

FOREST and FOREST NURSERIES (Including forest trees and forest nursery floor weeds), Christmas Tree, Cotton Wood, Poplar (Includes members of the genus Populus grown for pulp or timber).

### **GREENHOUSE FOOD CROP**

NURSERY and VEGETABLE PLANTS (Field grown and plants grown in benches, beds, containers (Incl. flats).

### **GREENHOUSE NON-FOOD CROPS**

NURSERY ORNAMENTAL, FLOWERS, GROUND COVERS, INTERIORSCAPES, PLANTSCAPES (Including, field grown or plants grown in benches, beds, containers (Incl. flats); woody and herbaceous Species.

### **DOMESTIC INDOOR/OUTDOOR**

### **WOOD AND WOOD STRUCTURE PROTECTION**

Preconstruction and Postconstruction termiticide use.

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Store Rotam Imidacloprid Technical in a cool, dry place away from food, drink, and feeding. If spilled, do not flush to waterways (see Environmental Hazards). Carefully connect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements).

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:**

**Plastic Containers:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**Metal Containers:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or purchase and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

**EMERGENCY RESPONSE**

**For 24 - hour emergency information regarding spills, leaks, exposure, or accidents, call: CHEMTREC 1-800-535-5053.**



**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

**NOTICE:** Read the entire Directions for Use and Conditions for 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 possible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of ROTAM LTD, or Seller. The Buyer and User shall assume all such risks, and Buyer and User agree to hold ROTAM LTD and Seller harmless for any claims relating to such factors.

ROTAM LTD 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 the product contrary to proper instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ROTAM LTD, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM LTD. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR NEITHER A PARTICULAR PURPOSE NOR ANY OTHER EXPENSES OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent allowed by law, ROTAM LTD or Seller shall not 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 ROTAM LTD 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 ROTAM LTD OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ROTAM LTD and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sales and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of ROTAM LTD.