



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

August 14, 2024

### **SENT BY EMAIL**

Blake Cowen  
blake.cowen@albaughllc.com  
ALBAUGH, INC.

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 - Updating the Primary Brand Name and other minor label revisions  
Product Name: ROTAM IMIDACLOPRID TECHNICAL  
Admin Number: 81598-5  
EPA Receipt Date: 02/15/2024  
Action Case Number: 00501092

Dear Blake Cowen:

The U.S. Environmental Protection Agency is in receipt of your application for notification under Pesticide Registration Notice 98-10 for the above referenced product. The EPA has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped "Notification" and will be placed in our records.

The primary brand name of this product has been changed from Rotam Imidacloprid Technical to Albaugh Imidacloprid Technical, and our records have been updated accordingly.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

If you have questions, please contact Scott Campbell via email at [campbell.scott@epa.gov](mailto:campbell.scott@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Scott Campbell (for)". The script is cursive and fluid, with the word "for" in parentheses.

Venus Eagle, PM01  
IVB3, RD  
Office of Pesticide Programs

NOTIFICATION

81598-5

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

[MASTER LABEL]

08/14/2024

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AlbaughRotam Imidacloprid Technical

For Formulation Use Only

ACTIVE INGREDIENT:	
IMIDACLOPRID*	98.0%
OTHER INGREDIENTS:	2.0%
TOTAL:	100.0%
*(CASRN: 138261-41-3)	

KEEP OUT OF REACH OF CHILDREN

WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique, a usted detalle.  
(If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
If Swallowed:	<ul style="list-style-type: none"><li>Call poison control center or doctor immediately for treatment advice.</li><li>Have person sip a glass of water if able to swallow.</li><li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>Do not give anything to an unconscious person.</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 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 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>
NOTE TO PHYSICIAN: No specific antidote. Treat symptomatically.	
HOTLINE NUMBERS	
<p>For non-emergency questions regarding exposure to this product, call 1-888-347-6732 (7 days/week, 24-hr/day). For medical emergencies, call the poison control center at 1-800-222-1222. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Have the product container or label with you when calling a poison control center or doctor or going for treatment.</p> <p>For 24-Hour Medical Emergency Assistance (Human or Animal), call: 1-800-222-1222.</p> <p>For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), call CHEMTREC: 1-800-424-9300.</p>	

[See Panel for Precautionary Statements, Directions For Use, and Storage and Disposal.]

For 24-hour chemical spill, leak, fire, or accident response information, call CHEMTREC toll free at 1-800-424-9300.

EPA Reg. No.: 81598-5	EPA Est. No.:
Manufactured [By] [For]: Albaugh, LLC 1525 NE 36th Street Ankeny, IA 50021Rotam Limited Unit 6, 26/F, Trend Centre 29 Cheung Lee Street Chai Wan, Hong Kong	Net Contents: _____

## PRECAUTIONARY STATEMENTS

### HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS

**WARNING.** 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, using tobacco products, or using the toilet. 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 requirements 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 end use products for the following uses:

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

### TERRESTRIAL FOOD CROPS (Including Domestic Food):

#### FIELD CROPS

Cotton, Potato (including Seed Piece Treatment), Tobacco

#### VEGETABLE and SMALL FRUIT CROPS (Field and Planthouse)

##### CUCURBIT VEGETABLES Crop Group

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 melon, Persian melon, pineapple melon, Santa Claus melon, snake melon and Winter melon), Pumpkin, Squash (includes summer squashes: butternut squash, calabaza, crookneck squash, Hubbard squash, scallop squash, straightneck squash, vegetable marrow and zucchini, and winter squashes: acorn squash and spaghetti squash), Watermelon (includes hybrids and/or varieties of *Citrullus lanatus*)

#### HERBS

Angelica, Balm (lemon balm), Basil (fresh and dried), Borage, Burnet, Camomile, Catnip, Chervil (dried), Chinese chive, Chive, Clary, Coriander (cilantro or Chinese parsley leaves), Costmary, Cilantro (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 and Tomato only

#### FRUITING VEGETABLES (Field and Planthouse)

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

#### BRASSICA (Cole) LEAFY 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

#### LEAFY GREEN VEGETABLES

Amaranth (leafy amaranth, Chinese spinach, tampala), Arugula (Rocket), Chervil, Chrysanthemum (edible leaved and garland), 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), Raddichio (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.: grain lupin, sweet lupin, white lupin, and white sweet lupin). Bean (*Phaseolus* spp.: field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean). Bean (*Vigna* spp.: 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, Sword bean]

**PEANUT**

**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, Sweet potato, Tanier (cocoyam), Tumeric, Turnip, Yam bean (jicama, manoic pea), Yam (true)

**ANNUAL AND PERENNIAL CROPS**  
Cranberry, Globe Artichoke, Hops, Strawberry, Sugarbeet

**TREE, BUSH, and VINE CROPS**  
Bushberry (Blueberry, Currant, Elderberry, Gooseberry, Huckleberry, Juneberry, Ligonberry, Salal), Grape (American bunch grape, Muscadine grape and Vinifera grape)

**BANANA and PLANTAIN**

**CANEBERRY**

**COFFEE**

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

**POME FRUIT**  
Apple, Crabapple, Loquat, Mayhaw, Pear (includes Oriental pear), Quince

**POMEGRANATE**

**TREE NUTS (except Almond)**  
Beechnut, Brazil nut, Butternut, Cashew, Chestnut, Chinquapin, Filbert, Hickory nut, Macadamia nut, Pecan, Pistachio, Walnut [black and English]

**STONE FRUIT**  
Apricot, Cherry (includes sweet and tart), nectarine, Peach, Plum (includes Chickasaw, Damson and Japanese), Plumcot, Prune (fresh and dried)

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

**OUTDOOR RESIDENTIAL CROPS (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)**  
Includes 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 (Includes 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 CROPS:**

**NURSERY and VEGETABLE PLANTS** (Field grown and plants grown in benches, beds, containers (including flats))

**GREENHOUSE NON-FOOD CROPS:**

**NURSERY ORNAMENTAL, FLOWERS, GROUND COVERS, INTERIORSCAPES, PLANTSCAPES** (Includes field grown or plants grown in benches, beds, containers (including flats), woody and herbaceous species)

**DOMESTIC INDOOR/OUTDOOR:****WOOD and WOOD STRUCTURE PROTECTION**

Pre-construction and post-construction termiticide use

**RESIDENTIAL INDOOR/OUTDOOR and DOMESTIC INDOOR/OUTDOOR:** Companion Animals**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Store ~~Rotam-Albaugh~~ Imidacloprid Technical in a cool, dry place away from food, drink, and feeding. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect 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 HANDLING:** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment or a mix tank. Return to point of sale or offer for recycling if available or dispose of in a sanitary landfill, or by incineration. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

**EMERGENCY RESPONSE:** For 24 hour emergency information regarding spills, leaks, exposure, or accidents, call: CHEMTREC 1-800-424-9300.

**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 impossible 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 LIMITED~~~~ALBAUGH LLC~~ or Seller. To the extent consistent with applicable law, the Buyer and User shall assume all such risks, and Buyer and User agree to hold ~~ALBAUGH LLC~~~~ROTAM LIMITED~~ and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, ~~ALBAUGH LLC~~~~ROTAM LIMITED~~ 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 ~~ALBAUGH LLC~~~~ROTAM LIMITED~~ and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ~~ALBAUGH LLC~~~~ROTAM LIMITED~~ 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 consistent with applicable law, ~~ALBAUGH LLC~~~~ROTAM LIMITED~~ 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 ~~ALBAUGH LLC~~~~ROTAM LIMITED~~ 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 ~~ALBAUGH LLC~~~~ROTAM LIMITED~~ OR SELLER, THE REPLACEMENT OF THE PRODUCT.

~~ALBAUGH LLC~~~~ROTAM LIMITED~~ 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 ~~ALBAUGH LLC~~~~ROTAM LIMITED~~.

[Registered: October 26, 2007]

021524

{[LABEL HISTORY]  
[(Not included in final printed labeling)]

File Name	Version Mark	Comment
<a href="#">081598-00005.20240215.DRAFT</a>	<a href="#">021524</a>	<a href="#">Label Notification (Primary Brand Name, Address Hotline Statement)</a>

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