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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

April 12, 2010

Madhu Mandava
Mandava Associates, LLC
6860 N. Dallas Parkway, Suite 200
Plano, TX 75024

Subject: Notification to Add Alternate Brand Name "Aza-Sol" per PRN 98-10
Product Name: SoluNeem
EPA Reg. No: 81899-4
Your Submission Dated January 27, 2010

Dear Mr. Mandava:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notice (PRN) 98-10, dated above. A screen of the labeling revision request has been conducted for its applicability under PRN 98-10, and it has been determined that the action request falls within the scope of this document. Our records have been duly noted, and the printed label with this application has been stamped "Notification Accepted" and will be placed in our records as current and updated. Should you have any questions regarding this action, you may contact Gina Casciano at (703) 605-0513 or via email at casciano.gina@epa.gov.

Sincerely,

Linda Hollis

Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration	OPP Identifier Number
		<input type="checkbox"/> Amendment	
		<input checked="" type="checkbox"/> Other	

Application for Pesticide - Section I

1. Company/Product Number 81899-4	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Soluneem	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) Soluneem, Inc. 1050 Bridgeway Sausalito, CA 94965 <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. _____ Date: <u>4/12/10</u> Product Name _____ Reviewer: <u>G. Casciano</u>	

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 type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

1) Notification Per PR Notice 98-10 of Alternate Brand Name: "Aza-Sol". "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." 2) Please direct all correspondence to: Madhu Mandava, Mandava Associates LLC, 6860 N. Dallas Parkway, Suite 200, Plano, TX 75035 Phone: 972-265-7924 Fax: 972-265-7942 E-mail: madhu@mandava.com

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input checked="" type="checkbox"/> Other (Specify) Poly lined paper	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 8 oz., 1, 2.5, 5, 10, 20, and 40 lb		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph 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 Madhu Mandava, Mandava Associates, LLC	Title Agent for Soluneem, Inc.	Telephone No. (Include Area Code) 972-265-7924
2. Signature 		6. Date Application Received (Stamped)
3. Title Agent for Soluneem, Inc.		
4. Typed Name Madhu Mandava, Mandava Associates, LLC	5. Date January 27, 2010	

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Aza-Sol

This label bears direction for both agricultural, commercial and residential use with specific application rates associated with the package size and area to be treated.

This product is a non-oiled based, water soluble powder Bio-insecticide from the botanical plant Neem "*Azadirachta Indica*"

Notification Accepted

- For use on turf grass, outdoor shrubs, trees and ornamentals
- For ornamental greenhouse, shade house, interiors cape and nursery use
- For mushroom house use
- For use on outdoor food crops

Date: 4/12/10

Reviewer: G. Casciano

For control, growth control, antifeedant and repelling Insects such as aphids, armyworms, beetles, budworms, cutworms, fungus gnats, leafhoppers, leafminers, leafrollers, lepidopterous larvae, loopers, mushroom flies, sawflies, thrips, webworms, whiteflies and other pests as listed; and plant parasitic nematodes such as dagger, golden, and root knot nematodes in vegetables, fruits, nuts, coconuts, agronomic crops and ornamental plants. For residential and commercial lawn, flowers and vegetable gardens, farms, forests, sod farms, nurseries, greenhouse-food and ornamental plants, mushrooms, nursery plants, interiorscapes, landscapes, turfgrasses and golf courses.

Use as a spray, drench, or chemigation.

ACTIVE INGREDIENT: Azadirachtin	6.00%
INERT INGREDIENTS:	94.00%
	100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

If on Skin or Clothing:

- 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:

- 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For medical emergencies, phone 24 hours a day, National Pesticide Telecommunication Network at 1-800-858-7378.

Soluneem Inc.
1050 Bridgeway
Sausalito, CA 94965

EPA Registration Number: 81899-
EPA Establishment No.:

Net Contents: 1 lb

See Side/Back Panel For Additional Precautionary Statements

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid breathing spray mist. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

Long-sleeved shirt and long pants:

Socks and shoes

Follow manufacturer's instructions for cleaning /maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users Should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

For terrestrial uses: 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 wash water or rinsate.

DIRECTIONS FOR USE

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

Do not apply this product through any irrigation system unless the chemigation instructions on this label are followed. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS).

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 4 hours. PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

Long-sleeved shirt and long pants

Socks and shoes

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APPLICATION INSTRUCTIONS

READ ALL DIRECTIONS AND PRECAUTIONS BEFORE USE

To apply Aza-Sol select a suitable power or pump pressure try sprayer or, or (for small residential areas) a hand held trigger type sprayer that will deliver a forceful, fine, leaf and fruit covering, wetting, spray mist. To get thorough spray coverage on waxy or pubescent plant surfaces the addition of small amount of a suitable sticker agent added to the spray mix, at the recommended rates may give better foliage, insect coverage and control.

APPLICATION METHOD AND EQUIPMENT: Aza-Sol can be applied as a foliar spray or a drench to soil or soil-less media (e.g., greenhouses and mushroom houses) to control insects and nematodes. When needed, soil drenches can also be used to control soil-borne pests, including soil-borne larvae of foliar insect pests. When applying as a drench, avoid excessive leaching. Aza-Sol can also be applied through sub-surface soil treatment equipment (e.g. turf grass). To repel adults, flies apply through fogging equipment. Always follow equipment manufacturers use directions.

Aza-Sol may be applied using any powered or manual pesticide application equipment, which includes but is not restricted to: high-volume, low- volume, ultra-low volume, electrostatic, fogging, and chemigation. Follow the original manufacturer's recommendations when using these types of equipment.

For optimum results, 2 to 3 applications made at 7 to 10 day intervals is recommended, unless otherwise specified. Foliar applications should be made to both side of leaves. In addition, a sticker agent used as per the manufacturer's recommendations may improve product performance.

AZA-SOL USE RATE RECOMMENDATIONS
FOR KEY PESTS BY USE SITE

Aza-Sol is intended for use on outdoor plants and food crops, mushroom houses, plants grown indoors or in greenhouses, shade cloth, interiors capes and nurseries. It can be used to control any of the following insects and nematodes.

Use the tables below to determine the appropriate use rate for your site / pest combination.

AZA-SOL PEST CONTROL CHART: USE RATES for indoor and outdoor plants including, FOOD CROPS, TREES, TURFGRASS, NURSERY, GREENHOUSE, INTERIORSCAPE, & LANDSCAPE PLANTS.

PEST	RATES: Aza-Sol™ oz's./Acre-tsp./1,000 sq.ft.	COMMENTS For Spray, Drench or Chemigation.
WHITEFLIES , such as: Greenhouse whiteflies, Silverleaf white flies, Woolly whiteflies.	6 ounces in 50 gal water/A 1 tsp /1 gal. water/1,000 sq.ft.	Make sure that spray covers upper, lower and all surfaces of leaves fruit and twigs.
LEAF MINERS , such as Azalea leafminers, Birch leafminers, Citrus leafminers, Serpentine leafminers	6 ounces in 50 gal water/A 1 tsp /1 gal. water/1,000 sq.ft.	Apply to new growth in spring before new larvae enter plant foliage. Repeat application at 10 to 14 day intervals if new infestations are expected.
SCALE, Crawlers: such as Brown Soft Scale, California red scale, Coffee Scale, Olive Scale, San Jose Scale.	6 ounces in 50 gal water/A 1 tsp /1 gal. water/1,000 sq.ft.	Make sure to thoroughly spray upper, lower and all surfaces of leaves and twigs.
MEALY BUGS Such as	6 ounces in 50 gal water/A	Spray to thoroughly cover twigs and

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Citrus Mealybugs	1 tsp /1 gal. water/1,000 sq.ft.	leaves.
THRIPS , such as: Citrus thrips, Onion thrips, thrips palmi,	6 ounces in 50 gal water/A 1 tsp /1 gal. water/1,000 sq. ft.	Spray in spring when young nymphs first appear on foliage.
APHIDS , such as: Cotton aphids, Green peach aphids, Pea aphids, Potato aphids	6 ounces in 50 gal water/A 1 tsp 11 gal. water/1,000 sq.ft.	Spray to wet lower side of leaves when "leaf curl" first appears.
PSYLLIDS , such as: Pear psylla	Same as above	Spray for new "instar" nymphs appearing on new discolored foliage.
BUGS , Nymphs of: such as Box-elder bugs, Chinch bugs, lygus bugs, spittle bugs, stink bugs,	6 ounces in 50 gal water/A 1 tsp 11 gal. water/1,000 sq.ft.	Spray early when nymphs are young. Aza-Sol™ will control " <u>instar</u> " growth until they die.
FLIES , Larvae of: such as Blueberry Maggot, Cherry Maggot, Crane Flies, Fruit flies, Midges, Onion Maggots, Tip worms, Walnut husk fly larvae.	6 ounces in 50 gal water/A 1 tsp 11 gal. water/1,000 sq.ft.	For Food and Non-food crops spray when larvae first appear.
SAWFLIES , Larvae of: such as: European Pine Sawflies, Yellow headed pine sawflies,	6 ounces in 50 gal water/A 1 tsp 11 gal. water/1,000 sq.ft.	Spray when first larvae appear when plants start new growth.
CATERPILLARS , Such as: Armyworms, Artichoke plume moth, Bagworms, Bollworms, Budworms, Cabbage butterflies, Cabbage loopers, Cankerworms, Caseworms, Corn Earworms, Cutworms, Diamond back moths, Fireworms, Fruitworms, Grapeleaf skeletonizer, Gypsy moths, Hornworms, Imported Cabbage worm, leaf perforators, Leafrollers, Melonworms, Navel orangeworms, Oblique banded Leafrollers, Omnivorous Leafrollers, oriental fruit moths, Pickleworms, Pine tip moths, Pinworms, Red banded leaf rollers, Sod webworms, Soybean loopers, Tent Caterpillars, Tobacco budworms, Tussocks moth larvae.	6 ounces in 50 gal water/A 1 tsp 11 gal. water/1,000 sq.ft.	Spray when first larvae worms appear. Repeat applications in 7 to 10 days. For continued pest control in the spring or fall when insect infestations are expected spray ornamentals and other plants at intervals of 2 to 3 weeks.
BEETLES , Larvae of: such as Bark beetles, Blueberry Flea beetles, Boll weevils, Colorado potato beetles, Flea beetles, Japanese beetles, Leaf beetles, Mexican, bean beetles, Phylloxera, Rose Chafers, Twig girdlers	6 ounces in 50 gal water/A 1 tsp 11 gal. water/1,000 sq.ft.	Spray when pests first appear. For Food Crops. Repeat application after 7 to 10 days. <u>Do not use with oil!</u> Make sure that all plant surfaces are thoroughly spray treated. Repeat in 5 to 7 days if required.
WEEVILS , Such as Black vine weevils, Pepper weevils, Strawberry vine weevils.	6 ounces in 50 gal water/A 1 tsp 11 gal. water/1,000 sq.ft.	Foliar anti-feedant sprays will stop adult feeding. Make at least 3 to 4 applications 10 days apart.
BORERS , Larvae of: Peach twig borer, Peach tree borers, Cranberry borers.	6 ounces in 50 gal water/A 1 tsp 11 gal. water/1,000 sq.ft.	Thoroughly spray in spring after egg hatch to control young larvae.
MOLE CRICKETS , nymphs	6 ounces in 50 gal water/A	For turfgrass, spray to drench turf for

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and young "in-stars". Turf Treatment.	1 tsp 11 gal. water/1,000 sq.ft.	young cricket nymphs in spring. Stops young from growth to adults.
MUSHROOM FLIES, Nematodes and Phorid Flies	Mix ½ oz. in 1 to 2 gallon of water and mist over, (or drench) 1,000 sq.ft.	See "For Mushrooms" Section on this label.

USE SITES FOR AZA-SOL

Aza-Sol can be used on Green-house: food crops, such as: Brassica (cole) crops, cucurbits, eggplants, herbs and spices, legumes, peppers, tomatoes.

MUSHROOMS, Varieties such as: Agaricus, enoki, maitake, oyster, shitake, and other specialty mushrooms

FOOD CROPS, including:

Root ,and tuber vegetables, such as: Artichoke, beets carrots, ginger, horseradish, potatoes, radishes, rutabagas, sweet potatoes, turmeric, turnips, yams.

Leafy vegetables (including Brassica leafy vegetables), such as: Amaranth, broccoli, Brussels sprouts, cabbage, cauliflower, celery, chervil, Chinese cabbage, collards, cress, endives, fennel, kale, kohlrabi, lettuce, mizuna ('mustard greens, parsley, purslane, rape greens, rhubarb, spinach, Swiss chard.

Legume vegetables, such as: beans (field, kidney etc.), chick-peas, cowpeas, guar, jackbeans, lablab beans, lentils, peas, pigeon peas, soybeans, sword beans.

Fruiting vegetables, such as: Eggplants, ground-cherries, pepinos, peppers, pimentos, tomatillos, tomatoes.

Cucurbit vegetables, such as: bitter melons, Chayotes, Chinese wax gourds, citron melons, cucumbers, gherkins, gourds, muskmelons (such as cantaloupes, casabas cranshaw etc.) pumpkins, squash, watermelons.

Citrus fruits, such as: Calamondins, citrus citrons, citrus hybrids, Grapefruits, Kumquats, Lemons, Limes, Mandarins, Oranges, pumellos, satusuma mandarins.

Pome fruits, such as: Apples, crabapples, loquats, mayhaws, oriental pears, pears, quinces.

Stone fruits, such as: Apricots, cherries, nectarines, peaches, plums, prunes.

Berries, such as: Blackberries, caneberries, blueberries, currants, cranberries, elderberries, gooseberries, huckleberries, loganberries, raspberries, strawberries, youngberries.

Cereal grains, such as: Barley, buckwheat, corn, millet, oats, popcorn, rice, rye, sorghum, teosinites, triticale hybrids, wheat, wild rice.

Herbs and spices, including but not limited to: allspice, ahgelica, anise, annatto, balm, basil, black and white peppers, borage, burnet, camomile, caper buds, cardamom, caraway, cassia, catnip, celery seeds, chervil, chives, cinnamon, caraway, cloves, corriander (cilantro), costmary, cumin, curry leaf, dills, fennels, fenugreek, grains of paradise, horehound, hyssop, juniper berry, lavender, lemongrass, lovage, mace, marigolds, marjoram, mustard seeds, nasturtium, nutmeg, parsley, pennyroyal, pepper (black & white), poppy seeds, rosemary, rue, saffron, sage, savory, sweet bay (bay leaf), tansy, tarragon, thyme, vanilla, wintergreen, woodruff, wormwood.

Bulb vegetables such as Garlic, leek, onions, shallots.

Nuts, such as: Almonds, beechnuts, Brazil nuts, butternuts, cashews, chestnuts, chinquapin, Coconuts, filberts, hickorynuts, Imacadamia, pecans, pistachios, walnuts.

Oilseed crops such as: Canola, castor, crambe, guar, jojoba, peanuts, rape, safflower, sesame, soybean, sunflower.

Tropical fruits: such as Atemoyas, bananas, breadfruits, cherimoyas, durians, guavas, malangas, mangoes, papayas, passionfruits, starfruits.

Other food & non-food crops: such as Asparagus, avocados, birdseed, cacao, coffee, edible flowers, feijoa, figs, ginseng, grapes, guayule, hops, kiwis, okras, olives, palms, papayas, pawpaws, persimmons, pineapples, rambutans, sugarcane, tamarillos, tea, tobacco, water chestnuts, watercress.

Ornamental Plants: such as: African violets, ageratium, aster, aucuba, begonia, cacti, calendula, calla, carnation, ceanothus, chrysanthemum, cineraria, coleus, cyclamen, daffodil, dahlia, delphinium, ficus, foliage plants, fuschia, gardenia, geranium, gloxinia, hyacinth, hydrangea, iris, ivy, lily, maidenhair fern, marigold, nandina, orchid, pansy, pelargonium, peony, phlox, pittisporum, poinsettia, pyracantha, rubber plant, snapdragon, stock, tulip, wandering jew, yew, yucca, zinnia.

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Ornamental Trees and Shrubs: such as: Andromeda, Arbovitae, ash, Austrian pine, azalea, beech, birch, birdsnest spruce, blue spruce, bougainvillea, boxwood, butternut, camellia, cedar, chamaecypar, dogwood, douglas fir, elm, euonymus, firethorn, forsythia, hackberry, hawthorn, hemlock, hickory, holly, honeylocust, horsechestnut, ilex, juniper, larch laurel, lilac, linden, London plane, magnolia, manvilla, maple, mimosa, mountain ash, myrtle, oak, pachysandra, peach, pine, phinota, pines, plane tree, poplar, privet, quince, rhododendron, roses, spruce, sycamore, white cedar and white pine.

FOR TURF GRASSES

Bent grass	
Bermuda grass	Fescue
Bluegrass, annual & perennial	Ryegrass; annual Ryegrass; perennial
Buffalo grass	St. Augustine grass
Centipede grass	Wheat grass Zoysia grass

For control of Sod Webworms, Cutworms, Aphids, Leafhoppers, ants, and chiggers: use a suitable pressure sprayer and mix 1 tbsp. in 2 to 3 gal. of water and apply to 2,500 sq.ft of turf. Apply when insect larvae first appear and if necessary repeat application in 10 to 14 days. The use of an approved "spreader sticker" may help the spray to penetrate turf down to the larvae/worm feeding area.

for Mushrooms and the Mushroom House

Aza-Sol™ for Mushroom Flies, Nematodes and Phorid Flies use Aza-Sol™ at the rate indicated on the PEST CONTROL CHART as a drench to the casing layer, media or compost. Make 4 to 5 applications 7 to 10 days apart. To repel fly adults, apply with fogging equipment at the first sign of activity. Can be applied between breaks up to the final flush.

CHEMIGATION OF AZA-SOL

General Information

This product may be applied only through drip (trickle) or sprinkler (center pivot, lateral move, end tow, side roll, traveler, big gun, solid set, or hand move), flood (basin) irrigation systems. Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non –uniform distribution of treated water. If you have questions about calibration, you should contact State Extension Service Specialists, equipment manufacturers or other experts. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place. A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Solubilize Aza-Sol with water before introduction into the system; use the diluted mixture within 8 hours. Do not apply in irrigation water if the pH exceeds 7.0. The optimum pH for application is a range of 5.5 to 6.5. if needed, the pH of the irrigation water can be adjusted by use of a suitable buffering agent. Agitation is necessary. Apply at the rate recommended in the Directions for Use using sufficient water to achieve an even distribution within an 8 hour period. Do not apply Aza-Sol at a rate that exceeds 20 grams active ingredient per acre. If applying Aza-Sol in combination with other products refer to the compatibility statement in the Directions for Use section.

OBSERVE THE FOLLOWING PRECAUTIONS IF YOUR CHEMIGATION SYSTEM IS CONNECTED TO A PUBLIC WATER SYSTEM

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Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of a year.

Chemigation systems connected to a public water systems must contain a functional, reduced-pressure zone (RPZ) , backflow preventer or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top of overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

The pesticide injection pipeline must contain a functional, automatic, quick closing check valve to prevent the flow of fluid back toward the injection pump. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in the cases where there is not a water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speeds favor drift beyond the area intended for treatment.

STATEMENTS CONCERNING THE OPERATION OF SPRINKLER CHEMIGATION; DRIP (TRICKLE); UTILIZING A PRESSURIZED WATER AND PESTICIDE INJECTION SYSTEM

The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow. The pesticide injection pipeline must contain a functional, automatic, quick – closing check valve to prevent the flow of fluid back toward the injection pump. The pesticide injection pipeline must also contain a functional , normally closed , solenoid – operated valve located on the intake side of the injection pump and connected to the system, interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down. The system must contain functional interlocking controls to automatically shut off the

pesticide injection pump when the water pump motor stops. The irrigation line or water pump must include a functional pressure switch that will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

STATEMENTS CONCERNING THE OPERATION OF FLOOD (BASIN) IRRIGATION UTILIZING GRAVITY FLOW OR PRESSURIZED WATER AND PESTICIDE INJECTION SYSTEM.

Systems using a gravity flow pesticide dispensing system must meter the pesticide into the water at the head of the field and downstream of a hydraulic discontinuity such as a drop structure or weir box to decrease potential for water source contamination from back flow if water flow stops.

Systems utilizing a pressurized water and pesticide injection system must meet the following requirements.

- a. The system must contain a functional interlocking check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.

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- b. The pesticide injection pipeline must contain a functional, automatic, quick closing check valve to prevent the flow of the fluid back toward the injection pump.
- c. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side to the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- d. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- e. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- f. Systems must use a metering pump, such as a positive displacement injection pump, (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store product in the original labeled container in a cool, dry, locked place out of reach of children. Keep containers tightly closed when not in use.

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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned stay out of smoke.

RESIDENTIAL PRODUCT DISPOSAL: As a responsible environmental practice, where possible, it is recommended that all of the contents of the container be used, carefully following label directions and precautions.

IF EMPTY: Do not reuse this container. Place in trash or offer for recycling if available.

IF PARTLY FILLED: Call your local waste agency or "1-800 CLEANUP" for disposal instructions. Never place unused product down any indoor or outdoor drain

SPILL: In case of product spill: Sweep up material and use as directed. If contaminated with soil or other particulate, dispose of according to PRODUCT DISPOSAL directions above.

IMPORTANT: PLEASE READ BEFORE USE

By using this product, the user accepts the following: LIMITED WARRANTY:

Soluneem, Inc. warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on its label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, cautions and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, and upon reports of field experience. Testing has not been performed on all varieties of food crops, and plants, in all states, or under all application, weather and crop conditions. There are no express warranties other than those set forth herein. Soluneem, Inc. neither makes nor intends, nor does it authorize any agent or representative to make, any other warranty, express or implied. Soluneem, Inc. expressly excludes and disclaims all implied warranties of merchantability, fitness for particular purpose, or any other warranty of quality of performance.

