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Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 81959-20	2. EPA Product Manager J. Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Etigra LLC / Imida E-AG - 4 F Cotton Insecticide	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) Etigra LLC 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 _____	NOTIFICATION JUL 20 2007
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

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

Notification of minor label revisions per PR Notice 98-10 to facilitate registration in the State of California. 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 6/21/07			

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

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

June 21, 2007

COURIER DELIVERY

John Hebert (PM 7)
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

NOTIFICATION

JUL 20 2007

RE: Etigra LLC – Imida E-AG – 4 F Cotton Insecticide (EPA Reg. No. 81959-20)
Notification of Minor Label Revisions per PRN 98-10 to Facilitate Registration in the State of California

Dear Mr. Hebert,

On behalf of Etigra LLC please find the enclosed notification of minor label revisions for Imida E-AG – 4 F Cotton Insecticide (EPA Reg. No. 81959-20). California specific language is being added/revised to facilitate registration of Imida E-AG – 4 F Cotton Insecticide in the state of California. Changes to the enclosed label include:

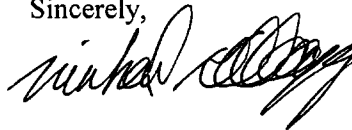
- Revised the front panel statement to read, “*Use not permitted on tree nuts in California unless otherwise directed by supplemental labeling.”
- Revised the statement “*Only approved for use on Pecans in the State of California” to read, “*Use not permitted in California unless otherwise directed by supplemental labeling.”
- Added CA restrictions to certain crops in the Rotational Crops section of the label

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

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Imida E-Ag – 4 F Cotton Insecticide labeling with changes tracked
3. One (1) copy of the Imida E-Ag – 4 F Cotton Insecticide labeling with changes incorporated
4. Letter of Authorization

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

Sincerely,



Michael Kellogg

Enclosures



January 14, 2007

To Whom It May Concern:

NOTIFICATION

JUL 20 2007

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 Etigra, LLC (EPA Company Number 81959), 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.

www.etigra.com

P.O. Box 999 (34451)
2214 Highway 44 West
Inverness, FL 34453
office 352-637-7772
fax 352-637-1787

501 Cascade Pointe Lane
Suite 103
Cary, NC 27513
office 919-342-5171
fax 919-342-5176

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Imida E-Ag – 4 F Cotton Insecticide

Insecticide for use on Cotton and Tree Nuts*

*Use not permitted on tree nuts in California unless otherwise directed by supplemental labeling.

Deleted: See Tree Nuts section for California use restrictions.

ACTIVE INGREDIENT:

Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine 40.7%

OTHER INGREDIENTS: 59.3%

TOTAL: 100.0%

Contains 4.0 pounds of active ingredient per gallon.

NOTIFICATION

JUL 20 2007

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If 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 in eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, 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.

EPA Reg. No. 81959-20

EPA Est. No.

Manufactured for:

Etigra LLC
2214 Hwy 44 West
Inverness, FL 34453

Imida E-Ag – 4 F Cotton Insecticide
contains imidacloprid, the active
ingredient used in Trimax™.

Net Contents:

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PERSONAL PROTECTIVE EQUIPMENT (PPE):

Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for Category C on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such as, nitrile rubber, butyl rubber, neoprene rubber, barrier laminate, polyethylene, polyvinyl chloride (PVC) or viton.
- Shoes plus socks

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

ENGINEERING CONTROLS STATEMENT

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove Personal Protective Equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area. This product is toxic to wildlife and highly toxic to aquatic invertebrates.

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Observe the following precautions when mixing and applying in the vicinity of aquatic areas such as lakes; reservoirs; rivers; permanent streams, marshes or natural ponds; estuaries and commercial fish farm ponds.

Mixing and Loading

To avoid potential contamination of groundwater, the use of a properly designed and maintained containment pad for mixing and loading of any pesticide into application equipment is recommended. If containment pad is not used, maintain a minimum distance of 25 feet between mixing and loading areas and potential surface to groundwater conduits such as field sumps, uncased well heads, sinkholes or field drains.

Spray Drift Management

The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator is responsible for considering all of these factors when making application decisions. Avoiding spray drift is the responsibility of the applicator.

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For Aerial Applications

The spray boom should be mounted on the aircraft so as to minimize drift caused by wing tip vortices. The minimum practical boom length should be used, and must not exceed 75% of the wing span or rotor diameter.

Importance of Droplet Size

An important factor influencing drift is droplet size. Small droplets (<150-200 microns) drift to a greater extent than larger droplets. Within typical equipment specifications, applications should be made to deliver the largest droplet spectrum that provides sufficient control and coverage. Formation of very small droplets may be minimized by appropriate nozzle selection, by orienting nozzles away from the air stream as much as possible and by avoiding excessive spray boom pressure.

Spray should be released at the lowest possible height consistent with good pest control and flight safety. Applications more than 10 feet above the crop canopy should be avoided.

Wind Speed Restrictions

Drift potential increases at wind speeds of less than 3 mph (due to inversion potential) or more than 10 mph. However, many factors, including droplet size, canopy and equipment specifications determine drift potential at any given wind speed. Do not apply when winds are greater than 15 mph and avoid gusty and windless conditions. Risk of exposure to sensitive aquatic areas can be reduced by avoiding applications when wind direction is toward the aquatic area.

Restrictions During Temperature Inversions

Do not make aerial or ground applications during temperature inversions. Drift potential is high during temperature inversions. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however if fog is not present, inversions can also be identified by the movement of smoke from a ground source. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical mixing.

Airblast (Air Assist) Specific Recommendations for Tree Crops and Vineyards

Airblast sprayers carry droplets into the canopy of trees/vines via a radially, or laterally directed air stream. The following specific drift management practices should be followed:

- Adjust deflectors and aiming devices so that spray is only directed into the canopy;
- Block off upward pointed nozzles when there is no overhanging canopy;
- Use only enough air volume to penetrate the canopy and provide good coverage;
- Do not allow the spray to go beyond the edge of the cultivated area (i.e., turf off sprayer when turning at end rows);
- Only spray inward, toward the orchard or vineyard, for applications to the outside rows.

No-Spray Zone Requirements for Foliar Applications

Do not apply by ground within 25 feet, or by air within 150 feet of lakes; reservoirs; rivers; permanent streams, marshes or natural ponds; estuaries and commercial fish farm ponds.

Runoff Management

Do not cultivate within 10 feet of the aquatic areas to allow growth of a vegetative filter strip.

When used on erodible soils, best management practices for minimizing runoff should be employed. Consult your local Natural Resources Conservation Service for recommendations in your use area.

Endangered Species Notice

Under the Endangered Species Act, it is a Federal Offense to use any pesticide in a manner that results in the death of a member of an endangered species. Consult your local county bulletin, County Extension Agent, or Pesticide State lead Agency for information concerning endangered species in your area.

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Resistance Management

Some insects are known to develop resistance to insecticides after repeated use. As with any insecticide, the use of this product should conform to resistance management strategies established for the use area.

Imida E-Ag – 4 F Cotton Insecticide contains a Group 4A insecticide called imidacloprid. Insect biotypes with acquired or inherent tolerance to group 4A products may eventually dominate the insect population if Group 4A products are used repeatedly as the predominant method of control for target species. This may eventually result in partial or total loss of control of those species by Imida E-Ag – 4 F Cotton Insecticide and to other Group 4A products.

The active ingredient in Imida E-Ag – 4 F Cotton Insecticide is a member of neonicotinoid chemical group. Avoid using a block of more than three consecutive applications of Imida E-Ag – 4 F Cotton Insecticide and/or other Group 4A products having the same or similar mode of action. Following a neonicotinoid block of treatments, Etigra LLC strongly encourages the rotation to a block of applications with effective products from a different mode of action before using additional applications of neonicotinoid products. Using a block rotation or windowed approach, along with other IPM practices, is considered an effective use strategy for preventing or delaying an insect pest's ability to develop resistance to this class of chemistry.

Foliar applications of Imida E-Ag – 4 F Cotton Insecticide or other Group 4A products from the neonicotinoid chemical class should not be used on crops previously treated with a long-residual, soil-applied product from the neonicotinoid chemical class.

Other Group 4A, neonicotinoid products used as foliar treatments include: Actara®, Assail®, Calypso®, Centric®, Intruder™, Leverage® and Trimax™. Other 4A Group, neonicotinoid products used as soil treatment include: Admire® and Platinum®.

Contact your local extension specialist, certified crop advisor and/or product manufacturer for additional insect resistance management recommendations. Also, for more information on Insect Resistance Management (IRM) visit the Insect Resistance Action Committee (IRAC) on the web at <http://irac-online.org/>.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

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

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

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material such as, nitrile rubber, butyl rubber, neoprene rubber, barrier laminate, polyethylene, polyvinyl chloride (PVC) or viton
- Shoes plus socks

GENERAL INFORMATION

Apply Imida E-Ag – 4 F Cotton Insecticide as a directed or broadcast foliar spray. Thoroughly cover foliage without runoff for optimum insecticidal efficacy. Use adequate spray volumes, properly calibrated application equipment and spray adjuvant if necessary to obtain thorough coverage. Failure to provide

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adequate coverage and retention of Imida E-Ag – 4 F Cotton Insecticide on leaves and fruit may result in loss of insect control or delay in onset of activity. Apply Imida E-Ag – 4 F Cotton Insecticide with properly calibrated ground or aerial application equipment. Minimum recommended spray volumes unless otherwise specified on crop specific recommended application sections are 10 gallons/acre by ground application and 5 gallons/acre through aerial equipment. Imida E-Ag – 4 F Cotton Insecticide may also be applied by overhead chemigation (see additional CHEMIGATION DIRECTIONS FOR USE section below) if allowed in crop specific recommended application section.

Imida E-Ag – 4 F Cotton Insecticide use on crops grown for production of true seed intended for private or commercial planting is generally not recommended but may be allowed under State specific supplemental labeling. As with any pesticide, care should be taken to minimize exposure of Imida E-Ag – 4 F Cotton Insecticide to honey bees and other pollinators. Use of Imida E-Ag – 4 F Cotton Insecticide on crops requiring bee pollination should be avoided during bloom and a minimum of 10 days prior to bloom. Additional information on Imida E-Ag – 4 F Cotton Insecticide uses for these crops and other questions may be obtained from the Cooperative Extension Service, PCA's, consultants or your local Etigra LLC representative.

Use Precautions

- Do NOT apply Imida E-Ag – 4 F Cotton Insecticide in enclosed structures such as greenhouses or plant houses.
- Do NOT apply more than 0.5 lb active ingredient of imidacloprid per acre per season, including seed treatment, soil and foliar uses unless specified within a crop-specific recommended application section for a given crop.

Rotational Crops

As soon as practical following the last application, treated areas may be replanted with any crop specified on an imidacloprid label or any crop for which a tolerance exists for imidacloprid. *For crops NOT listed on an imidacloprid label or for crops for which no tolerances for the active ingredient have been established, a 12-month plant-back interval should be observed.* Cover crops for soil building or erosion control may be planted at any time.

Immediate Plant-Back: All crops on this label plus the following crops:

Barley	Canola	Christmas trees*
Corn (field, sweet and pop)	Cranberry*	Globe artichoke
Grape*	Mustard seed*	Okra*
Potato	Rapeseed	Strawberry
Sorghum	Sunflower*	Tobacco
Watercress*	Wheat	
*Not in California		

All crops from the following Crop Groups as recognized and defined by EPA. Crops contained within a particular crop group are subject to change. For information related to specific crops please contact your Etigra LLC representative or refer to EPA's website (www.epa.gov) for latest crop groups:

Root Vegetables – Crop Group 1

*Leafy Green Vegetables – Crop Group 4

Head and Stem Brassica Vegetables – Crop Group 5

*Legume Vegetables – Crop Group 6 including edible podded plus dried plus succulent shelled, peas and beans

Fruiting Vegetables – Crop Group 8

Cucurbit Vegetables – Crop Group 9

*Citrus – Crop Group 10

*Pome Fruit – Crop Group 11

*Stone Fruit – Crop Group 12

*Bushberry and Caneberry – Crop Group 13

*Herbs – Crop Subgroup 19A

*Tropical Fruit – including Acerola, Atemoya, Avocado, Birida, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Llama, Jaboticaba, Guava, Longan, Lychee, Mamey sapote, Mango, Papaya,

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Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu

*Not in California

30-Day Plant-Back

Cereals (including Buckwheat, Millet, Oats, Rice, Rye and Triticale)

Safflower

Soybean

10-Month Plant-Back

Onion and bulb vegetables

12-Month Plant-Back

All other crops

MIXING INSTRUCTIONS

Add a portion of the required amount of water to the spray tank, commence agitation and referring to the table in the Application Instructions section below add the specified amount of Imida E-Ag – 4 F Cotton Insecticide. Complete filling the tank with the remaining water. Be sure to maintain agitation both while mixing and during application.

NOTE: When targeting aphids and / or whiteflies, an organosilicone-based spray adjuvant is recommended.

Tank-Mixes

Imida E-Ag – 4 F Cotton Insecticide may also be used with other pesticides and/or fertilizer solutions. When tank-mixing Imida E-Ag – 4 F Cotton Insecticide with other pesticides, prepare the tank mixture as recommended above and use the following instructions:

- 1) Add wettable powders first
- 2) Add Imida E-Ag – 4 F Cotton Insecticide or other flowables second
- 3) Add emulsifiable concentrates last

Be sure to maintain agitation as each component is added and do not add an additional component until the previous component is thoroughly integrated into the mixture. If a fertilizer solution is added, a fertilizer-pesticide compatibility agent may be needed.

Pests Controlled (in addition to pests listed below)	Imida E-Ag – 4 F Cotton Insecticide (fl. oz. / Acre)	Bidrin® 8 [†] (fl. oz / Acre)
For early season control of: Thrips	1.0 – 1.5	1.6 - 3.2
For mid- to late-season control of: Plant Bugs Stink Bugs (including Brown Stink Bug) Grasshoppers Saltmarsh Caterpillar Cotton Leaf Perforator	1.0 – 1.5	4.0 - 8.0
<ul style="list-style-type: none"> Do NOT graze treated fields after any application of Imida E-Ag – 4 F Cotton Insecticide Pre-Harvest Interval (PHI): 14 days Minimum interval between applications: 7 days Maximum Imida E-Ag – 4 F Cotton Insecticide allowed per crop season: 9.9 fluid ounces/Acre (0.31 lb A/A) Maximum number of Imida E-Ag – 4 F Cotton Insecticide applications per season: 5 [†] Refer to the Bidrin® 8 product label for specific use recommendations and be sure to observe all restrictions and precautions that appear on the label.		

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Compatibility Test

Before adding Imida E-Ag - 4 F Cotton Insecticide to the spray tank or mix tank, the compatibility of the desired tank-mix partners should be determined. Add proportionate amounts of each ingredient in the appropriate order to a pint or quart jar, cap, shake for 5 minutes, and let set for 5 minutes. Poor mixing or formation of precipitates that do not readily re-disperse indicates an incompatible mixture that should not be used.

CHEMIGATION DIRECTIONS FOR USE

Types of Irrigation Systems: Chemigation applications of Imida E-Ag - 4 F Cotton Insecticide may be made to crops through overhead sprinkler chemigation systems if specified in the crop-specific recommended application sections. Do not apply Imida E-Ag - 4 F Cotton Insecticide through any other type of irrigation system.

Water Volume: Imida E-Ag - 4 F Cotton Insecticide applications should be made as concentrated as possible. Retention of Imida E-Ag - 4 F Cotton Insecticide on target site of insect infestation is necessary for optimum activity. Chemigation of Imida E-Ag - 4 F Cotton Insecticide in water volumes exceeding 0.1 inch/acre is not recommended.

Uniform Water Distribution and System Calibration: The irrigation system must provide uniform distribution of treated water. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water. The system must be calibrated to uniformly apply the rates specified. If you have questions about calibration, contact State Extension Service specialists, equipment manufacturers or other experts.

Chemigation Monitoring: 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.

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

Safety Devices for Irrigation Systems Connected to Public Water Supplies:

If the source of water for your irrigation system is a public water supply, follow the instructions below.

1. 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 the year.
2. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, 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 or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.
3. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
4. The pesticide injection pipeline must 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.
5. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. 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.
7. Do not apply when wind speed favors drift beyond the area intended for treatment.

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Safety Devices for Irrigation Systems Not Connected to a Public Water Supply:

1. 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 backflow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. 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.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. 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 the pesticide distribution is adversely affected.
6. 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.
7. Do not apply when wind speed favors drift beyond the area intended for treatment.

APPLICATION INSTRUCTIONS

Apply the specified rate of Imida E-Ag – 4 F Cotton Insecticide as a directed or broadcast spray using properly calibrated ground or aerial application equipment. For best results apply to infested areas as the target pest just begins to develop. To achieve optimal control, complete and uniform coverage is necessary.

To promote plant health and yield, scout fields throughout the growing season and make multiple applications of Imida E-Ag – 4 F Cotton Insecticide as needed.

COTTON

- Do NOT graze treated fields after any application of Imida E-Ag – 4 F Cotton Insecticide
- Pre-Harvest Interval (PHI): 14 days
- Minimum interval between applications: 7 days
- Maximum Imida E-Ag – 4 F Cotton Insecticide allowed per crop season: 9.9 fluid ounces/Acre (0.31 lb A/A)
- Maximum number of Imida E-Ag – 4 F Cotton Insecticide applications per season: 5

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Cotton Aphid Cotton Fleahopper Bandedwinged Whitefly Plant bugs (excludes <i>Lygus hesperus</i>) Green Stink Bug Southern Green Stink Bug Bollworm / Budworm (ovicidal effect)	1.0 – 2.0	Apply as a directed or broadcast spray treatment just as the target pest begins to develop. Use the lower rates listed early in the season when pest pressures are low or when tank-mixing with other effective products registered for the target pest. NOTE: Applications made with less than 5 gallons per acre may result in slower activity and/or less overall control from a single application than an application made with higher gallonages.

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Lygus Bug (<i>Lygus hesperus</i>) Whiteflies (other than Bandedwinged Whitefly)	1.5 – 2.0	Suppression only of these pests.
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TREE NUTS*

***Use not permitted in California unless otherwise directed by supplemental labeling.**

Deleted: Only approved for use on Pecans in the State of California

Crops of Crop Group 14 including: Almond, Beechnut, Brazil nut, Butternut, Cashew, Chestnut, Chinquapin, Filbert, Hickory nut, Macadamia nut, Pecan, Pistachio, Walnut (black and English)

- Do NOT apply pre-bloom or during bloom or when bees are actively foraging.
- Pre-Harvest Interval (PHI): 7 days
- Minimum interval between applications: 6 days
- Maximum Imida E-Ag – 4 F Cotton Insecticide allowed per crop season: 11.5 fluid ounces/Acre (0.36 lb AI/A)
- Minimum application volume (water): 50 GPA – ground application, 25 GPA – aerial application

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids (except Black pecan aphid) Leafhoppers/Sharpshooters Phylloxera sp. (leaf infestations) Spittlebugs Whiteflies	1.4 – 2.8	Time applications for control of San Jose scale to coincide with the crawler stage, treating each successive generation. Two applications on a 10 to 14-day interval may be required to achieve control.
Black pecan aphid Mealybugs San Jose scale	3.2	

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry place, out of direct sunlight, 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 facility.

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

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CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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