

81959-23

9-25-2006

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 81959-23	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Etigra, LLC / ET-025	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Etigra, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gia 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 SEP 25 2006
<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 PRN 98-10. 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
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	Other (Specify) _____	
		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 8/31/06			

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NOTIFICATION

SEP 25 2006

ET-025

Systemic and foliar insect control in grapes, turfgrass (including sod farms), and on fruit and nut trees, landscape ornamentals, and interior plantscapes.

ACTIVE INGREDIENT:

Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine 75.0%

OTHER INGREDIENTS: 25.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en 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"> • 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 a poison control center or doctor • Do not do anything by mouth an unconscious person
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.
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.
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 WARNING

May be fatal if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Keep children and pets away from treated area until spray is dry.

EPA Reg. No. 81959-23

Manufactured for:
Etigra, LLC
2214 Highway 44 West
Inverness, FL 34453

EPA Est. No.

ET-025 contains imidacloprid, the active ingredient used in Merit® and Provado®.

Net Weight:

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PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such as, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (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 STATEMENTS

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 PPE 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

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

This product is highly toxic to bees exposed to direct treatment or residues on the foliage of 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.

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.

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.

NOT FOR USE IN COMMERCIAL GREENHOUSES, NURSERIES, ON GRASSES GROWN FOR SEED, OR ON COMMERCIAL FRUIT AND NUT TREES

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 pesticide. 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 the uses of this product that are covered by the Worker Protection Standard.

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

Exception: If the product is applied by drenching, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton
- Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries and greenhouses.

- Keep children and pets off treated areas until dry.

SPRAY DRIFT MANAGEMENT

Aerial applications are permitted ONLY on agricultural use grapes for Grapeleaf skeletonizer suppression.

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.

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.

Mixing and Loading Requirements

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.

Aerial Applications

The spray boom should be mounted on the aircraft so as to minimize the 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 large 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.

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 give 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

Because the potential for spray drift is high during temperature inversions, do NOT make aerial or ground applications 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 Vineyards

Airblast sprayers carry droplets into the canopy of 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. turn off sprayer when turning at end rows);
- Only spray inward, toward the vineyard, for applications to the outside rows.

RUNOFF MANAGEMENT

Do not cultivate within 10 feet of the aquatic areas to allow growth of 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.

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.

ET-025 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 targeted species. This may eventually result in partial or total loss of control of those species by ET-025 and to other Group 4A products.

The active ingredient in ET-025 is a member of the neonicotinoid chemical group. Avoid using a block of more than three consecutive applications of ET-025 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 of a different mode 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 ET-025 or other Group 4A products from the neonicotinoid chemical class should not be used on crops previously treated with a long-residual, soil-applied products from the neonicotinoid chemical class.

Other Group 4A, neonicotinoid products used as foliar treatments include: Actara®, Assail®, Calypso®, Centric®, Intruder™, Leverage®, Provado®, 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 Insecticide Resistance Action Committee (IRAC) on the web at <http://irac-online.org/>.

Use Precautions:

- Keep children and pets off treated areas until dry.
- Do NOT apply through any type of irrigation system.
- Do NOT apply by air. *[Note to Reviewer: This statement will not appear on final sub-label for agricultural use grapes]*
- Do NOT graze treated areas or use clippings from treated areas for feed or forage.

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- Do NOT apply ET-025 to soils that are waterlogged or saturated and avoid runoff or puddling of irrigation water following application.
- Do NOT allow lechate to run out for the first 10 days after application or reduced efficacy may result.
- Do NOT exceed a total of 8.6 oz. / Acre per year (0.4 lb. A/A).

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE [For product packaged in plastic containers]: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

PESTICIDE STORAGE [For product packaged in Water Soluble Packaging]: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area. Exposure to moisture or excessive handling of water soluble packets may cause breakage.

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 [For product packaged in plastic container]: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONTAINER DISPOSAL [For product packaged in Water Soluble Packaging]: Completely empty bag into application equipment. Then 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.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Etigra, LLC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Etigra, LLC and Seller harmless for any claims relating to such factors.

Etigra, LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Etigra, LLC, and Buyer and User assume the risk of any such use. **ETIGRA, LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent allowed by state law, neither Etigra, LLC or Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ETIGRA, LLC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ETIGRA, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Etigra, LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Etigra, LLC.

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Actara[®], Centric[®], and Platinum[®] are trademarks of a Syngenta Group Company.

Assail[®] is a trademark of Nippon Soda Co., Ltd.

Admire[®], Merit[®], Provado[®], Calypso[®], Leverage[®] and Trimax[™] are trademarks of Bayer.

Intruder[™] is a trademark of Nippon Soda Co., Ltd. and licensed for distribution by E.I. duPont de Nemours and Company.

Etigra[™] is a trademark of Etigra.

ET-025 is not manufactured or distributed by Bayer CropScience, seller of Provado[®].

ET-025 is not manufactured or distributed by Bayer Environmental Science, seller of Merit[®].

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FOR PRODUCT PACKAGED IN WSP

MIXING AND APPLICATION INSTRUCTIONS

Inside each foil pouch is a clear, water soluble inner packet containing the ET-025. To prepare a solution, remove the outer foil pouch and drop the required number of unopened clear water soluble packets into the spray tank while filling with water to the desired level. Be sure to agitate while mixing and depending on the amount of agitation and the water temperature, the packets should completely dissolve within a few minutes of being added to the water. Note that cooler water temperatures increase the time needed for the inner packet to completely dissolve.

Mixing Precautions:

- Do NOT allow packets to become wet prior to adding to the tank.
- Do NOT handle the clean inner packets with wet hands or wet gloves.
- Do NOT use this product in a tank-mix with products that contain Boron or release free chlorine. Combining these products will result in a plastic that is not soluble in water or solvents (such as diesel oils, kerosene, gasoline or alcohol). NOTE: Chlorinated water may be used.
- Because the water soluble packets are not soluble in petroleum-based liquids, do NOT attempt to use ET-025 water soluble packets directly in diesel oils or summer spray type oils such as those used in ULV or LV applications.
- Rough handling of the packets may cause breakage.
- Reseal outer carton to protect remaining packets.

Tank Mixes: ET-025 has been found to be compatible with commonly used liquid fertilizers, fungicides and insecticides. If ET-025 is not known to be compatible with your particular tank mix partners, compatibility should be checked using the correct proportion of products in the following small jar test:

- 1) Add proportionate amount of each ingredient in the appropriate order to a pint or a quart jar;
- 2) Cap and shake for 5 minutes;
- 3) 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. For further information, contact your local Etigra, LLC representative.

Mixing Instructions: The enclosed packets containing ET-025 are water-soluble and will completely dissolve in water. The proper mixing procedure for ET-025 alone or in tank mix combinations with other pesticides is:

1. Fill the spray tank ¼ to 1/3 full with clean water.
2. While recirculating and with the agitator running, add the required number of unopened ET-025 packets.
3. The packets should completely dissolve in 5 to 10 minutes; allow sufficient time for thorough mixing.
4. Continue to fill spray tank with water until ½ full.
5. If applicable, add remaining tank mix components in the following order: wettable powders, flowables, and emulsifiable concentrates. Ensure good agitation as each component is added. Do not add a tank mix component until the previous component is thoroughly mixed.
6. Fill spray tank to desired level and maintain constant agitation to ensure uniformity of spray mixture.

TURFGRASS

ET-025 will control soil-inhabiting pests in grassy areas such as home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, and athletic fields and sod farms. The need for an application can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. Applications may be made preceding the egg laying activity of the target pests and high levels of control may be achieved when applications are made proceeding or during the egg laying period. For best results, make applications prior to egg hatch of the target pests, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

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Use Precautions:

- Applications must NOT exceed a total of 8.6 oz. (0.4 lb of active ingredient) per acre per year.
- Applications should NOT be made when grassy areas are waterlogged or the soil is saturated with water because adequate distribution of the active ingredient cannot be achieved when these conditions exist.
- The treated grassy area must be in such a condition that the rainfall or irrigation will penetrate vertically in the soil profile.
- Avoid mowing treated areas until after sufficient rainfall or irrigation has occurred in order to maintain the uniformity of the application.

Application Instructions:

Apply ET-025 in sufficient water to provide adequate distribution in the treated area. Use of accurately calibrated equipment normally used for soil application of insecticides is required. Use equipment that will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off-target drift. Check calibration periodically to ensure that equipment is working properly.

Pest	Application Rate	Specific Instructions
Larvae of: Annual bluegrass weevil Asiatic garden beetle Billbugs Black turfgrass ataeenius Cutworms† European Chafer Green June beetle Japanese beetle Northern masked chafer Oriental beetle <i>Phyllophaga</i> spp. Southern masked chafer	1.6 oz. (1 packet) per 11,000 sq. ft.	<p>Grubs, European Crane Fly, billbugs and annual bluegrass weevil: For best results make applications prior to egg hatch of the target pest.</p> <p>Cinchbugs: Make applications prior to the hatching of the first instar nymphs.</p> <p>Mole Crickets: Make applications prior to or during the peak egg hatching period. When adults or large nymphs are present and actively tunneling, ET-025 should be accompanied by a curative insecticide.</p> <p>NOTE: For best results, the active ingredient must be moved through the thatch by irrigation or rainfall occurring within 24 hours after application.</p>
Cinchbugs† Mole Crickets	8.6 oz. per Acre or 4 level Tbs. per 1,000 sq. ft.	
† Suppression only.		

ORNAMENTALS, GROUNDCOVERS AND INTERIOR PLANTSCAPES

ET-025 is a systemic insecticide that may be applied to ornamentals, groundcovers and interior plantscapes in and around industrial and commercial buildings and residential areas. The insecticide is translocated upward into the plant system and for best results must be placed where the growing portions of the target plant can absorb the active ingredient. When applicable, adding a fertilizer containing nitrogen into the spray solution may enhance plant uptake of ET-025.

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 the active ingredient. 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. NOTE: Cover crops for soil building or erosion control may be planted at any time, but do not graze or harvest for food or feed.

Ant Management Programs:

ET-025 may be used to limit the honeydew available as a food source for ant populations when controlling aphids, scale insects, mealy bugs and other sucking pests on ornamentals. ET-025 applications may be supplemented with bait traps, residual sprays and other methods to further reduce the unwanted ant population.

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Insect Resistance:

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. Consult your Cooperative Extension Service for resistance management strategies and recommended pest management practices for your area.

Woody Perennials:

Protection in woody perennials is slower than in herbaceous species and a delay of 2 or more weeks should be expected, with longer delays for larger plants. Because of this, applications to woody perennials should be made well in advance of expected insect activity.

Bark Media:

ET-025 treatments to media with 30 - 50% or more bark content may confer a shorter period of protection.

FOLIAR AND BROADCAST APPLICATIONS

ET-025 may be applied as a broadcast or foliar application to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers, interior landscapes and vegetable plants intended for resale.

Application Instructions:

Apply ET-025 in sufficient water to provide adequate distribution in the treated area. Use of accurately calibrated equipment normally used for soil application of insecticides is required. Use equipment which will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off-target drift. Check calibration periodically to ensure that equipment is working properly.

NOTE: When making foliar applications to plants with hard-to-wet foliage such as holly, pine or ivy, use of a spreader / sticker is recommended.

Pest	Application Method	Application Rate	Specific Instructions
Adelgids Aphids Japanese beetle (adult) Lacebugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Leafminers Mealybugs Sawfly larvae Thrips† Whiteflies	Foliar	1.6 oz. (1 packet) per 300 gal. of water	Make applications prior to establishment of large pest populations and retreat as necessary. NOTE: Applying ET-025 foliarly after a soil application in the same crop is not recommended for resistance management purposes.
White grub larvae (such as Japanese beetle larvae, chafer, Phyllophaga spp., Asiatic garden beetle and Oriental beetle)	Broadcast	1.6 oz. (1 packet) per 11,000 sq. ft.	Mix the recommended amount of ET-025 in sufficient water to uniformly cover the area being treated using at least 2 gallons of water per 1000 sq. ft. For best results, incorporate the ET-025 into the upper soil profile by irrigating after the application is made.
† Suppression only.			

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SOIL INJECTION AND DRENCH APPLICATIONS

Application Site	Recommended Rate	Application Instructions	Pests Controlled
<p>Trees</p> <p>NOTE: Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing pest damage and tree stress.</p>	<p>1.6 oz. (1 packet) per 24 – 48 inches of cumulative trunk diameter (DBH)</p>	<p>SOIL INJECTION – No Soil Injection Application allowed in Nassau or Suffolk counties of New York.</p> <p>GRID SYSTEM: Holes should be spaced on 2.5 ft centers, in a grid pattern, extending to the drip line of the tree.</p> <p>CIRCLE SYSTEM: Apply in holes evenly spaced in circles, (use more than one circle dependent upon the size of the tree) extending in from the drip line of the tree.</p> <p>BASAL SYSTEM: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base.</p> <p>Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. For optimum control, keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per tree.</p>	<p>Adelgids Aphids Armored Scale† Black vine weevil larvae Eucalyptus Longhorned Borers Flatheaded Borers (including bronze birch and alder borers) Japanese Beetles (adults) Lacebugs Leaf Beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Leafminers Mealybugs Pine Tip Moth larvae Psyllids Royal Palm Bugs Sawfly larvae Soft Scales Thrips† White grub larvae Whiteflies</p>
<p>Shrubs</p>	<p>0.1 – 0.2 fl. oz. per foot of shrub height</p>	<p>SOIL INJECTION – No Soil Injection Application allowed in Nassau or Suffolk counties of New York.</p> <p>Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Using a minimum of 4 holes per shrub, apply to individual plants maintaining a low pressure and use sufficient solution for distribution of the liquid into the treatment zone.</p> <p>Keep the treated area moist for 7 to 10 days.</p>	<p>SOIL DRENCH: Remove plastic or any other barrier that will stop solution from reaching the root zone. Uniformly apply around the base of the tree, direct to the root zone as a drench in no less than 10 gallons of water per 1000 square feet.</p>
<p>Flowers and Ground Cover</p>	<p>0.46 - 0.60 fl. oz. per 1000 sq. ft.</p>	<p>Apply as a broadcast treatment and incorporate into the soil before planting or apply after plants are established. If application is made to established plants, optimum control will be attained if area is irrigated thoroughly after application.</p>	

† Suppression only of these species.

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POME FRUIT IN AND AROUND RESIDENTIAL AREAS

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

- Pre-Harvest Interval (PHI): 7 days
- Reapplication Interval: At least 10 days
- Maximum Applications per Year: 5

Pest	Ounces per 300 gal. of Water	Ounces per Acre [†]	Specific Instructions
Aphids (except Woolly apple aphid) Leafhoppers (including glassy-winged sharpshooter) Leafminer Mealybugs [‡] San Jose Scale [‡]	1.6 (1 packet)	2.1	Apply as a foliar spray as needed after petal-fall is complete. Rosy Apple Aphid: Apply prior to leaf rolling caused by the pest. Leafhopper: For late season (preharvest) control, apply while most leafhoppers are in the nymphal stage. Leafminer: Make first application as soon as petal-fall is complete for control of first generation, with best results occurring when the application is made at the earliest possible time. For succeeding generations, best results occur when applications are made early in the adult flight against egg and early instar larvae. If generations are overlapping or severe pressure continues, a second application may be necessary after 10 days. A single application may result in suppression only. NOTE: ET-025 will not control late stage larvae. Mealybug: For best results be sure to have good spray coverage of the trunk and scaffolding limbs or other nesting sites. San Jose Scale: Time applications to the crawler stage and treat each generation.
[†] Not permitted for control on pears in California. [‡] The amount of ET-025 required per acre depends on tree size and volume of foliage. The listed rate per acre is based on a standard of 400 gallons of dilute spray per acre for large trees.			

PECANS IN AND AROUND RESIDENTIAL AREAS

NOT PERMITTED IN CALIFORNIA unless otherwise directed by supplemental labeling

- Reapplication Interval: At least 10 days
- Maximum Applications per Year: 3
- Maximum ET-025 allowed per Year: 6.3 oz. / Acre

Pest	Ounces per 300 gal. of Water	Ounces per Acre [†]	Specific Instructions
Yellow pecan aphid Black margined aphid Pecan leaf phylloxera Pecan spittlebug Pecan stem phylloxera	1.6 (1 packet)	2.1	Apply as a foliar spray as pest pressure builds but before infestation is extremely heavy. Two applications at a 10 – 14 day interval may be required to achieve control. For best results, thorough and uniform coverage is necessary. Coverage may be improved through the use of an organosilicone-based spray adjuvant.
[†] The amount of ET-025 required per acre depends on tree size and volume of foliage. The listed rate per acre is based on a standard of 400 gallons of dilute spray per acre for large trees.			

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**GRAPES
ORNAMENTAL AND AGRICULTURAL USE**

- Reapplication Interval: At least 14 days
- Maximum ET-025 allowed per Year: 2.0 oz. / Acre

Ornamental Grapes In and Around Industrial and Commercial Buildings and Residential Areas			
Pest	Ounces per 300 gal. of Water	Ounces per Acre¹	Specific Instructions
Leafhoppers (including glassy-winged sharpshooter) Mealybugs	1.6 (1 packet)	1.0	Apply as a foliar spray using 200 gallons of water per acre.

Agricultural Use Grapes including American bunch grape, Muscadine grape and Vinefera grape		
Pest	Application Rate	Specific Instructions
Leafhoppers/Sharpshooters Mealybugs	0.8-1.0 oz. per Acre	Pre-Harvest Interval (PHI): 0 day Minimum Interval between applications: 14 days Maximum ET-025 allowed per crop season: 2.0 oz. per Acre (0.1 lb. AI/A)
Grapeleaf skeletonizer ¹	1.0 oz. per Acre	

¹ Control of Grapeleaf skeletonizer can be expected from ground applications that provide thorough coverage of foliage. Aerial applications may provide suppression.

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FOR PRODUCT PACKAGED IN NON-WSP

TURFGRASS

ET-025 will control soil-inhabiting pests in grassy areas such as home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, and athletic fields and sod farms. The need for an application can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. Applications may be made preceding the egg laying activity of the target pests and high levels of control may be achieved when applications are made proceeding or during the egg laying period. For best results, make applications prior to egg hatch of the target pests, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

Use Precautions:

- Applications must NOT exceed a total of 8.6 oz. (0.4 lb of active ingredient) per acre per year.
- Applications should NOT be made when grassy areas are waterlogged or the soil is saturated with water because adequate distribution of the active ingredient cannot be achieved when these conditions exist.
- The treated grassy area must be in such a condition that the rainfall or irrigation will penetrate vertically in the soil profile.
- Avoid mowing treated areas until after sufficient rainfall or irrigation has occurred in order to maintain the uniformity of the application.

Application Instructions:

Apply ET-025 in sufficient water to provide adequate distribution in the treated area. Use of accurately calibrated equipment normally used for soil application of insecticides is required. Use equipment which will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off-target drift. Check calibration periodically to ensure that equipment is working properly.

Pest	Level Teaspoons per 1000 sq. ft.	Ounces per Acre	Specific Instructions
Larvae of: Annual bluegrass weevil Asiatic garden beetle Billbugs Black turfgrass ataeenius Cutworms [†] European Chafer Green June beetle Japanese beetle Northern masked chafer Oriental beetle <i>Phyllophaga</i> spp. Southern masked chafer	2.5 – 4.0	5.4 – 8.6	Grubs, European Crane Fly, billbugs and annual bluegrass weevil: For best results make applications prior to egg hatch of the target pest. Cinchbugs: Make applications prior to the hatching of the first instar nymphs. Mole Crickets: Make applications prior to or during the peak egg hatching period. When adults or large nymphs are present and actively tunneling, ET-025 should be accompanied by a curative insecticide. NOTE: For best results, the active ingredient must be moved through the thatch by irrigation or rainfall occurring within 24 hours after application.
Cinchbugs [†] Mole Crickets	4.0	8.6	
[†] Suppression only.			

1 level teaspoon = 1.4 grams of ET-025
 3 level teaspoons = 1 level tablespoon

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ORNAMENTALS, GROWDCOVERS AND INTERIOR PLANTSCAPES

ET-025 is a systemic insecticide that may be applied to ornamentals, groundcovers and interior plantscapes in and around industrial and commercial buildings and residential areas. The insecticide is translocated upward into the plant system and for best results must be placed where the growing portions of the target plant can absorb the active ingredient. When applicable, adding a fertilizer containing nitrogen into the spray solution may enhance plant uptake of ET-025.

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 the active ingredient. 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. NOTE: Cover crops for soil building or erosion control may be planted at any time, but do not graze or harvest for food or feed.

Ant Management Programs:

ET-025 may be used to limit the honeydew available as a food source for ant populations when controlling aphids, scale insects, mealy bugs and other sucking pests on ornamentals. ET-025 applications may be supplemented with bait traps, residual sprays and other methods to further reduce the unwanted ant population.

Insect Resistance:

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. Consult your Cooperative Extension Service for resistance management strategies and recommended pest management practices for your area.

Woody Perennials:

Protection in woody perennials is slower than in herbaceous species and a delay of 2 or more weeks should be expected, with longer delays for larger plants. Because of this, applications to woody perennials should be made well in advance of expected insect activity.

Bark Media:

ET-025 treatments to media with 30 - 50% or more bark content may confer a shorter period of protection.

FOLIAR AND BROADCAST APPLICATIONS

ET-025 may be applied as a broadcast or foliar application to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers, interior plantscapes and vegetable plants intended for resale.

Application Instructions:

Apply ET-025 in sufficient water to provide adequate distribution in the treated area. Use of accurately calibrated equipment normally used for soil application of insecticides is required. Use equipment which will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off-target drift. Check calibration periodically to ensure that equipment is working properly.

NOTE: When making foliar applications to plants with hard-to-wet foliage such as holly, pine or ivy, use of a spreader / sticker is recommended.

Pest	Application Method	Application Rate		Specific Instructions
Adelgids	Foliar	ET-025	Water	Make applications prior to

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Pest	Application Method	Application Rate		Specific Instructions
Aphids Japanese beetle (adult) Lacebugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Leafminers Mealybugs Sawfly larvae Thrips [†] Whiteflies		0.25 tsp. 0.50 tsp. 1.0 tsp. 2.5 tsp. 5.0 tsp.	2.5 gal. 5.0 gal. 10.0 gal. 25.0 gal. 50.0 gal.	establishment of large pest populations and retreat as necessary. NOTE: Applying ET-025 foliarly after a soil application in the same crop is not recommended for resistance management purposes.
White grub larvae (such as Japanese beetle larvae, chafers, Phyllophaga spp., Asiatic garden beetle and Oriental beetle)	Broadcast	3 – 4 level teaspoons per 1000 sq. ft.		Mix the recommended amount of ET-025 in sufficient water to uniformly cover the area being treated using at least 2 gallons of water per 1000 sq. ft. For best results, incorporate the ET-025 into the upper soil profile by irrigating after the application is made.
[†] Suppression only.				

1 level teaspoon = 1.4 grams of ET-025
3 level teaspoons = 1 level tablespoon

SOIL INJECTION AND DRENCH APPLICATIONS

Application Site	Recommended Rate	Application Instructions	Pests Controlled
Trees NOTE: Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing pest damage and tree stress.	0.7 – 1.4 level teaspoons per inch of trunk diameter (DBH) or 1 – 2 oz. per 30 cumulative inches of trunk diameter (DBH)	SOIL INJECTION – No Soil Injection Application allowed in Nassau or Suffolk counties of New York. GRID SYSTEM: Holes should be spaced on 2.5 ft centers, in a grid pattern, extending to the drip line of the tree. CIRCLE SYSTEM: Apply in holes evenly spaced in circles, (use more than one circle dependent upon the size of the tree) extending in from the drip line of the tree. BASAL SYSTEM: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base. Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. For optimum control, keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per tree.	Adelgids Aphids Armored Scale [†] Black Vine Weevil larvae Emerald Ash Borer (adult) [†] Eucalyptus Longhorned Borers Flatheaded Borers (including bronze birch and alder borers) Japanese Beetles (adults) Lacebugs Leaf Beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter)
		SOIL DRENCH: Remove plastic or any other barrier that will stop solution from reaching the root zone. Uniformly apply around the base of the tree, direct to the root zone as a drench in no less than 10 gallons of water per 1000 square feet.	Leafminers Mealybugs Pine Tip Moth larvae Psyllids Royal Palm Bugs Sawfly larvae Soft Scales Thrips [†] White Grub larvae Whiteflies
Shrubs	0.7 – 1.4 level teaspoons per foot of shrub height or 1 – 2 oz. per 30 cumulative feet of shrub height	SOIL INJECTION – No Soil Injection Application allowed in Nassau or Suffolk counties of New York. Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Using a minimum of 4 holes per shrub, apply to individual plants maintaining a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. Keep the treated area moist for 7 to 10 days.	
		SOIL DRENCH: Remove plastic or any other barrier that will stop solution from reaching the root zone. Uniformly apply around the base of the tree, direct to the root zone as a drench in no less than 10 gallons of water per 1000 square feet.	

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Application Site	Recommended Rate	Application Instructions	Pests Controlled
Flowers and Ground Cover	3 – 4 level teaspoons per 1000 sq. ft.	Apply as a broadcast treatment and incorporate into the soil before planting or apply after plants are established. If application is made to established plants, optimum control will be attained if area is irrigated thoroughly after application.	
<p>† Suppression only of these species.</p> <p>* Make a minimum of two applications per season with the first application in late May / early June or when adult beetles begin to fly. Make the second application approximately one month after the first application.</p>			

1 level teaspoon = 1.4 grams of ET-025
3 level teaspoons = 1 level tablespoon

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

18/18
Phone: 253-853-7369
Fax: 253-853-5516
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August 31, 2006

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Etigra, LLC – ET-025 (EPA Reg. No. 81959-23)
Notification of Minor Label Revisions per PRN 98-10

Dear Ms. Eagle,

On behalf of Etigra, LLC please find the enclosed notification of minor label revisions permitted by PRN 98-10. Changes to the enclosed label include:

P. 4 – added “Do not apply by air” to the “Use Precautions” section of the label.

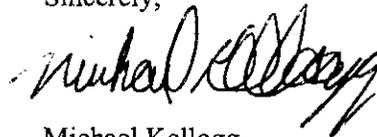
Etigra intends on marketing a sub-label for use on turfgrass (including sod farms), fruit and nut trees, landscape ornamentals, interior plantscapes and ornamental grapes and a separate sub-label for agricultural use grapes. The “Do not apply by air” statement will appear on the final turfgrass, fruit and nut trees, etc. sub-label but will not appear on the agricultural use grapes sub-label as aerial application is permitted for this use site.

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 ET-025 labeling with changes tracked
3. One (1) copy of the ET-025 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