



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number:

81959-32

Date of Issuance

APR 2 2007

Term of Issuance: Conditional

Name of Pesticide Product:

ET1 105 131 Greenhouse and
Nursery Insecticide

NOTICE OF PESTICIDE:

Registration
 Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Mr. Michael Kellogg
Etigra, LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. N.W.
Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

- 1. Revise the EPA Registration Number to read, EPA Reg. No. "81959-32".

Signature of Approving Official:

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division (7505P)

Date

APR 2 2007

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2. Make the following changes to the "Conditions of Sale and Warranty" statement:

- At the beginning of the last sentence in paragraph three begin the sentence with "**To the extent consistent with applicable law,**" ...
- At the beginning of the second sentence of paragraph four add the statement "**To the extent consistent with applicable law**"...

3. Submit to the Agency the required one year storage stability (830.6317) and Corrosion characteristics study (830.6320) for the proposed product. It is recommended that the observations are made at 0, 3, 6, 9 and 12 months intervals.

4. Submit two copies of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sect. 6(e). Your release for shipment of the product constitute acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact me at (703) 305-5409.

Enclosure:

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ETI 105 13 I

Greenhouse and Nursery Insecticide

For foliar and systemic insect control on ornamental and vegetable plants in greenhouses, nurseries and interior plantscapes

ACTIVE INGREDIENT:

Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine60.0%

OTHER INGREDIENTS:40.0%

TOTAL: 100.0%

Keep water-soluble packets in this container and store in a cool dry place but not below freezing (32F).

Do not remove packets from container except for immediate use.

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 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. • Call a poison control center or doctor for further 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.
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, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 2 2007

EPA Reg. No. 81959-

EPA Est. No.

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

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

ETI 105 13 I contains imidacloprid, the active ingredient used in Marathon.

81959-32 Net Weight:

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 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 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.

GENERAL INFORMATION

ETI 105 13 I will control insects on ornamental and vegetable plants grown in nurseries, greenhouses and interior landscapes. ETI 105 13 I is a systemic insecticide applied as a soil treatment **only** and is translocated upward within the plant. For best results, ETI 105 13 I must be applied where the roots of the target plants can absorb the active ingredient. After application, irrigate moderately but thoroughly being sure to avoid leaching and runoff from the container for at least three irrigations or 10 days whichever is longer.

ETI 105 13 I General Precautions:

- A foliar application of any chloronicotinyl insecticide for resistance management purposes following an ETI 105 13 I soil application in the same crop is NOT recommended.
- Do NOT use ETI 105 13 I packets in a tank mix with products that contain boron or release free chlorine; the PVA packet reacts with boron or free chlorine to produce a plastic that is not soluble in water. NOTE: Normal chlorinated water is acceptable for mixing.

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.

Incorporation: Applications of ETI 105 13 I may be incorporated by cultivation, irrigation, rainfall, mechanical placement, soil injection, drenching and broadcast sprays.

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.

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Bark Media: ETI 105 13 I treatments to media with 30 - 50% or more bark content may confer a shorter period of protection.

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 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 (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.

Exception: If the product is soil-injected or soil-incorporated, 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, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton
- Shoes plus socks

APPLICATION THROUGH IRRIGATION SYSTEMS (CHEMIGATION)

ETI 105 13 I may be applied at rates recommended on this label either alone or in tank mixture with other pesticides and chemicals registered for application through irrigation systems. The normal dilution ratio is 1:10 to 1:200, depending on the system. Always meter the product into the irrigation water during the first part of the irrigation cycle. The product may be mixed separately prior to injection. Agitation may be necessary if the mixture is allowed to stand more than 24 hours.

- 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.
- Apply ETI 105 13 I only through micro-irrigation (individual spaghetti tube), drip irrigation, overhead irrigation, and ebb and flood or hand-held or motorized calibrated irrigation equipment. **Do not apply this product through any other type of irrigation system.** Crop injury or lack of effectiveness can result from non-uniform distribution of treated water.
- Be sure to remove scale, pesticide residue and other foreign matter from the tank and entire irrigation system prior to application.
- A person knowledgeable of the chemigation system and responsible for its operation, or a person who is under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.
- If you have any questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.

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.

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.

MIXING INSTRUCTIONS

Within each foil pouch is a clear, water-soluble inner packet containing ETI 105 13 I. To prepare the mixture, remove the outer foil pouch and drop the required number of unopened clear water soluble packets, as determined under "Recommended Drench and Irrigation Applications", into the spray tank while filling with water to the desired level. Operate the agitator while mixing. Depending on the amount of agitation and the water temperature, the packets should be completely dissolved within a few minutes of being added to the water, with cooler water temperatures increasing the time needed for the inner packet to dissolve completely.

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.
- Rough handling of the packets may cause breakage.
- Reseal outer carton to protect remaining packets.

Tank Mixes: ETI 105 13 I has been found to be compatible with commonly used liquid fertilizers, fungicides and insecticides. If ETI 105 13 I is not known to be compatible with your particular tank mix partners, compatibility should be checked using the correct proportion of products in a small jar test.

APPLICATION TO GRASSY AREAS IN NURSERIES

NOTE: ETI 105 13 I may NOT be used on commercial sod farms.

ETI 105 13 I will control soil-inhabiting pests in grassy areas in or around nurseries such as under or around field or container grown plants, on roadways or other grassy areas. 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.

Pests Controlled:

- | | | |
|--|--|---|
| Annual bluegrass weevil (<i>Hyperodes</i> spp.) | Asiatic garden beetle (<i>Maladera castanea</i>) | Billbugs (<i>Spherophorus</i> spp.) |
| European chafer (<i>Rhizotrogus majalis</i>) | Green June beetle (<i>Cotinis nitida</i>) | Japanese beetle (<i>Popillia japonica</i>) |
| May or June beetle (<i>Phyllophaga</i> spp.) | Mole Crickets (<i>Scapteriscus</i> spp.) | Oriental beetle (<i>Anomala orientalis</i>) |
| Black turfgrass ataenius (<i>Ataenius spretulus</i> and <i>Aphodius</i> spp.) | | |
| Northern and Southern masked chafers (<i>Cyclocephala borealis</i> , <i>C. immaculata</i> , and/or <i>C. lurida</i>) | | |

Pests Suppressed:

- | | |
|----------|------------------|
| Cutworms | Hairy Chinchbugs |
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Use Precautions:

- Applications must NOT exceed a total of 10.7 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.

Application Instructions:

Apply ETI 105 13 I in sufficient water to provide adequate distribution in the treated area. The 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.

RECOMMENDED APPLICATIONS

Application Site	Recommended Rate	Pests Controlled	Application Instructions
Grassy areas of Field & Forest Nurseries	1 Packet per 2900-3850 sq. ft.	Larvae of: Annual bluegrass weevil Asiatic garden beetle Billbugs Black turfgrass ataenius Cutworms (suppression only) European chafer Green June beetle Japanese beetle Northern masked chafer Oriental beetle <i>Phyllophaga</i> spp. Southern masked chafer	Make application prior to egg hatch of grubs, billbugs, and annual bluegrass-weevil for optimum control. Apply prior to the hatching of the first instar nymphs for chinchbug suppression. Apply prior to or during the peak egg hatch for mole cricket control. When adults or large nymphs are present and actively tunneling, ETI 105 13 I should be accompanied by a curative insecticide. Follow label instructions for other insecticides when tank mixing.
	1 Packet per 2900 sq. ft.	Chinch bugs (suppression only) Mole crickets	Consult your local turf, state Agricultural Experiment Station, or State Extension Service Specialist for more specific information regarding timing of application. NOTE: For optimum control, irrigation or rainfall should occur within 24 hours after application to move the active ingredient through the thatch. Do not apply more than 10.7 oz. (0.4 lb. active ingredient) per acre per year. Do not mow grass area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.

RECOMMENDED APPLICATIONS FOR USE ON OR IN ORNAMENTALS

For foliar and systemic insect control in and around field-grown nursery and containers stock, indoor and outdoor ornamentals (including both greenhouse and interior landscapes) and ornamentals grown in flats, benches or beds.

Application Site	Recommended Rate	Pests Controlled	Application Instructions
Trees (including non-bearing fruit and nut) Shrubs Evergreens Flowers Foliage plants Ground covers Interior landscapes Vegetable plants*	1 Packet per 100 gallons water	Adelgids Aphids Japanese beetles (adults) Lacebugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Leafminers Mealybugs Sawfly larvae Thrips (suppression) Whiteflies	For foliar application, begin treatments prior to the establishment of high pest populations and reapply on an as needed basis. An ETI 105 13 I foliar application is not recommended following a soil application in the same crop for resistance management purposes.
	1 Packet per 2900 - 3850 sq. ft.	White grub larvae (such as Japanese beetle, chafers, <i>Phyllophaga</i> spp., Asiatic garden beetle, Oriental beetle)	Broadcast Applications: Mix the required amount of ETI 105 13 I in sufficient water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of water per 1000 sq. ft. of treatment area. Irrigate thoroughly to incorporate the product into the upper soil profile. Incorporate application into the soil before planting or apply after plants are established. For applications made to established plants, optimum control is attained if area is irrigated thoroughly after application.

*Only for use on vegetable plants intended for resale including: Broccoli, Chinese broccoli, Broccoli raab, Brussels sprouts, Cabbage, Chinese Cabbage, Cauliflower, Collards, Eggplant, Ground cherry, Kale, Kohlrabi, Lettuce, Mustard greens, Pepinos, Peppers, Potatoes, Rape greens, Sorghum, Sugarbeets, Tomatillo, and Tomato.

IRRIGATION AND DRENCH APPLICATIONS

ETI 105 13 I may be applied to ornamental and vegetable plants in greenhouses, nurseries and interior landscapes using soil drenches, micro-irrigation, drip irrigation, overhead irrigation, ebb and flood irrigation, or hand-held or motorized calibrated irrigation equipment.

Use Precautions:

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soils that are water logged or saturated, which will not allow the penetration of the insecticide into the root zone of the plants.
- Do not allow leachate runoff for the first 10 days after application, in order to retain the product and facilitate full plant uptake of the active ingredient.
- For outdoor ornamentals grown in beds or turf, applications of ETI 105 13 I cannot exceed a total of 10.7 oz (0.4lb of active ingredient) per acre per year.
- On plants with a production cycle of less than one year, application is not to exceed a frequency of more than once each 16 weeks for a particular plant. On stock plants and woody crops with a production cycle of greater than one year, application may not exceed once a year.

Food Crops:

Treated areas may be replanted with any crop specified on an imidacloprid label, or with any crop for which a tolerance exists for the active ingredient.

A 12-month plant-back interval should be observed for crops not listed on an imidacloprid label or for crops for which no tolerances for the active ingredient have been established.

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RECOMMENDED RATES AND INSTRUCTIONS FOR IRRIGATION AND DRENCH APPLICATIONS

Application Site		Recommended Rate		Application Instructions	Pests Controlled
Plants in Containers	Herbaceous Species including Vegetables ⁵ (one or two plants per pot)	Container Size (inches)	# of pots treated with one (1) packet	Evenly distribute one (1) packet of ETI 105 13 I in the stated number of pots, using sufficient water volume to wet potting medium without loss of liquid through leaching. Irrigate moderately after application. To avoid loss of active ingredient due to leaching, do NOT allow leaching or runoff to occur for 10 days after application.	Adelgids Aphids Armored Scale (suppression) Fungus gnat (larvae only) ¹ Japanese beetles (adults) Lacebugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Mealybugs Psyllids Root mealybugs ² Root weevil complex (such as Black Vine Weevil, Apopka Weevil, Citrus Root Weevil) Soft scale Thrips (suppression) ⁴ White Grub Larvae (Such as Japanese beetle, Masked Chafers, European Chafer, Oriental Beetle, Asiatic Garden Beetle) Whiteflies
		2	3000		
		3	2000		
		4	1500		
		5	1200		
		6	1000		
		7	850		
		8	750		
		9	675		
		10	600		
		11	550		
		12	500		
	Woody Perennial Species or Herbaceous Species including Vegetables ⁵ (three or more plants per pot)	2	2000		
		3	1350		
		4	1000		
		5	800		
		6	650		
		7	550		
		8	500		
		9	450		
10	400				
11	350				
12	300				
Ornamental and Vegetable ⁵ plants grown in flats, benches, or beds		One packet per 3000 sq. ft. in sufficient water to uniformly and accurately cover the area being treated. Do NOT use less than 2 gallons of mixture per 1000 sq. ft.		Apply as a broadcast treatment and incorporate into the medium before planting or apply after plants are established. If application is made to established plants, optimum control will be attained if area is lightly irrigated after application. Do NOT allow leaching or runoff to occur for 10 days after application.	
Containerized Plants		Container Size (gallons)	# of pots treated with one (1) packet	For optimum control, make applications prior to egg hatch of the target pest. Apply in sufficient water to wet the potting medium. Irrigate moderately after application to move the active ingredient into the root zone.	
		1	240 to 120		
		2	120 to 60		
		3	90 to 40		
		5	65 to 30		
Field and Forest Nurseries		One (1) packet per 1000 ft of row or 3000 sq. ft. in a minimum spray volume of 2 gallons per 1000 square feet. In areas of turf, apply as a broadcast application using one (1) packet per 3000 sq. ft. in a minimum spray volume of 2 gallons per 1000 square feet.		Vegetation in the area to be treated should be mowed to a height of 3 inches or less prior to application. Mowing to the lowest possible height will ensure greater consistency of control. Apply May through July as a uniform band on either side of row using a band six (6) inches wider than the actual root ball diameter to be dug. Do not allow bands in adjacent rows to overlap. For optimum control, treatment should be followed by rainfall or irrigation.	White grub larvae (such as Japanese beetle, Masked chafers, European chafer, Oriental beetle, Asiatic garden beetle)

¹ Fungus Gnat larvae in the soil will be controlled by drench or incorporation; ETI 105 13 I does not control adult Fungus Gnats. Other foliar insect control is achieved translocating the active ingredient up into the plant via the root system.

² To control root mealybug, a thorough drenching of the containerized media is necessary. Use a rate of one (1) packet in 150 gallons of water and be sure to obtain complete coverage while minimizing the amount of leachate.

³ For control of citrus root weevil on non-bearing citrus nursery stock ONLY.

⁴ Thrips on foliage only are suppressed, not in buds and flowers.

⁵ For use on vegetable plants intended for resale only including: Broccoli, Chinese Broccoli, Broccoli Raab, Brussels Sprouts, Cabbage, Chinese Cabbage Cauliflower, Collards, Eggplant, Ground Cherry, Kale, Kohlrabi, Lettuce, Mustard Greens, Pepinos, Peppers, Potatoes, Rape Greens, Sorghum, Sugarbeets, Tomatillo and Tomato.

RECOMMENDED RATES AND INSTRUCTIONS FOR SOIL INJECTION AND DRENCH APPLICATIONS FOR NURSERY, GREENHOUSE AND INTERIORESCAPE PLANTS			
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 Packet (20 grams) per 8 to 16 inches of cumulative trunk diameter</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) beneath the drip line of the tree extending in from that line.</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</p> <p>Aphids</p> <p>Armored Scale†</p> <p>Black vine weevil larvae</p> <p>Eucalyptus Longhorned Borers</p> <p>Flatheaded Borers (including bronze birch and alder borers)</p> <p>Japanese Beetles (adults)</p> <p>Lacebugs</p> <p>Leaf Beetles (including elm and viburnum leaf beetles)</p> <p>Leafhoppers (including glassy-winged sharpshooter)</p> <p>Leafminers</p> <p>Mealybugs</p> <p>Pine Tip Moth larvae</p> <p>Psyllids</p> <p>Royal Palm Bugs</p> <p>Sawfly larvae</p> <p>Soft Scales</p> <p>Thrips†</p> <p>White grub larvae</p> <p>Whiteflies</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>Shrubs</p>	<p>1 packet (20 grams) per 8 to 16 feet of cumulative 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>1 packet (20 grams) per 3000 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 of these species only.

EBB AND FLOOD APPLICATIONS

ETI 105 13 I insecticide may be applied through Ebb and Flood applications. To assure accurate uptake it is recommended that prior to treatment, a minimum of 10 plants be brought up to a known field capacity and allowed to dry out for one or two days. Re-wet these plants to determine how much water on average each plant will absorb to return it to field capacity.

RECOMMENDED RATES AND INSTRUCTIONS FOR EBB AND FLOOD APPLICATIONS						
Application Site		Recommended Rate		Application Instructions	Pests Controlled	
Plants in Containers	Herbaceous species including vegetable plants ⁵ (one or two plants per pot)	Container Size (inches)	# of pots treated with one (1) packet	To minimize the return back to the storage tank, keeping pot sizes uniform use the volume absorbed per plant (see test above) multiplied by the number of pots being treated. Add to this volume a required minimum to flood your smallest treatment area. Re-use the returned volume with subsequent irrigation or nutrients on the same plants.	Adelgids Aphids Armored scales (suppression) Fungus Gnats (larvae only) ¹ Japanese Beetles (adults) Lacebugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Leafminers Mealybugs Psyllids Root mealybugs ² Root Weevil Complex: (such as Apopka Weevil, Black Vine Weevil, Citrus Root Weevil) ³ Soft Scales Thrips (suppression) ⁴ Whiteflies White Grub larvae (such as Japanese Beetle, Masked Chafers, European Chafer, Oriental Beetle, Asiatic Garden Beetle)	
		2	3000			
		3	2000			
		4	1500			
		5	1200			
		6	1000			
		7	850			
		8	750			
		9	675			
		10	600			
	Woody perennials, herbaceous species including vegetable plants ⁵ (3 or more per pot)	Container Size (inches)	# of pots treated with one (1) packet			
		2	2000			
		3	1350			
		4	1000			
		5	800			
		6	650			
		7	550			
		8	500			
		9	450			
		10	400			

¹ Fungus Gnat larvae in the soil will be controlled by drench or incorporation; ETI 105 13 I does not control adult Fungus Gnats. Other foliar insect control is achieved translocating the active ingredient up into the plant via the root system.

² To control root mealybug, a thorough drenching of the containerized media is necessary. Use a rate of one (1) packet in 150 gallons of water and be sure to obtain complete coverage while minimizing the amount of leachate.

³ For control of citrus root weevil on non-bearing citrus nursery stock ONLY.

⁴ Thrips on foliage only are suppressed, not in buds and flowers.

⁵ For use on vegetables plants intended for resale only including: Broccoli, Chinese Broccoli, Broccoli Raab, Brussels Sprouts, Cabbage, Chinese Cabbage, Cauliflower, Collards, Eggplant, Ground Cherry, Kale, Kohlrabi, Lettuce, Mustard Greens, Pepinos, Peppers, Potatoes, Rape Greens, Sorghum, Sugarbeets, Tomatillo and Tomato.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: 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 DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: After removal of all PVA packets, dispose of empty container in a sanitary landfill, by incineration or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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