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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

August 2, 2011

Ross Gilbert, agent for Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St., NW Gig Harbor, WA 98332

re:

Turfthor WP, EPA Reg. #82957-3

label amendment – container handling – master label consisting of 2 sub-labels P438582

accepted

Dear Mr. Gilbert:

The revised labeling reference to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is ACCEPTABLE.

This amendment was submitted to update the container handling directions. During review the registrant explained that the product is sold in two different packages. However, each package type requires different Directions for Use. While these two packages would usually be registered as two separate products, at the registrant's request both packages will be registered under a single EPA registration number but the stamped master label consists of two sub-labels, one for each package type.

Submit two (2) copies of your final printed labeling incorporating the above changes prior to releasing your product for shipment. If the above provisions are not complied with the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of the label stamped "accepted" is enclosed for your records. If you have any questions please contact Tom Harris at (703) 308-9423 or harris.thomas@epa.gov

Sincerely yours,

Rosanna Louie-Juzwiak

Product Manager

Insecticide Rodenticide Branch Registration Division (7505C)

enclosure



TURFTHOR WP

For foliar and systemic control of listed insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses*, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

*Not registered for this use in California

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	<u>25.0%</u>
TOTAL:	100.0%

Each water soluble packet contains 1.6 ounces product (0.075 lbs active ingredient)

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta gue la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III. Inc.

Fayetteville, NC 28303

20110110 Turfthor WP 82957-3 Master Label containing WP sub label and WSP sub label_EPA comments incorporateda.pdf

	FIRST AID
If swallowed	Call 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 to an unconscious person.
lf on skin or	Take off contaminated clothing.
clothing	Rinse skin immediately with plenty of water for 15 to 20 minutes.
	Call a poison control center or doctor for treatment advice.
If in eyes	Hold eye open and rinse slowly and gently with water for 15 to 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.
	HOTLINE NUMBER
	ainer or label with you when calling a poison control center or doctor . You may also contact 1-(866)-367-8467 for emergency medical
	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. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Keep children and pets off treated area until spray is dry.

Personal Protective Equipment: 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 and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: 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 pesticide 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 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.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

- Do not apply more than 5 water soluble packets of TURFTHOR WP per acre per year. Do not exceed 0.4 lb. active ingredient imidacloprid per acre per year of any product containing imidacloprid.
- Do not apply in greenhouses or nurseries.
- Not for use on turf or plants being grown for sale, for commercial seed production, or for research purposes.
- Not for use on bearing fruit or nut trees.
- Do not apply through an irrigation system.
- TURFTHOR WP is not registered for use on golf courses in the state of California

ACCEPTED AUG - 2 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

EPA. Reg. No: 82957-3

STORAGE AND DISPOSAL

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

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

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: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available 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.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix; open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Generally, a few minutes is sufficient time for the packets to completely dissolve.

Avoid using TURFTHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer spray oils.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of listed soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites are lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses (not in California), cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turn pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried

Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application-equipment must be used to apply TURFTHOR WP

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications		
Use Rate	Ounces (Packets) per sq. feet	Packets per acre
Α	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.	4
В	1.6 ounces (1 packet) per 8,250 sq. ft.	5

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate (0.4 lbs a.i. per acre per year) is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Against Specific Turf Pests

Ġrubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable TURFTHOR WP Use Rate (packets per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Packets TURFTHOR WP to use = A x B. Round down to nearest integer.

example: $(56,628 \text{ sq. feet} / 43,560 \text{ sq. feet}) \times (5 \text{ packets / acre}) = 6.5 = \text{round down to use 6 packets"}$

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

Maximum Applications Per Year

Limited to one application per year for turf.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Application Sites

For use on ornamental trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites are landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against listed insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants (except fire, pharaoh, harvester, carpenter ants)

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed up to a maximum of 5 water soluble packets per acre per year. Do not apply more than 0.4 lb. imidacloprid per acre per year of any product containing imidacloprid.

Mixing Table for TURFTHOR WP for Foliar Applications	
1.6 ounces (1 packet) per 300 gallons of water.	

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate (0.4 lbs a.i. per acre per year).

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle. Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants, trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs

1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ADDITIONAL RESTRICTIONS

Do not apply more than 5 water soluble packets of Turfthor WP per acre per year (0.4 lbs imidacloprid per acre per year of any product containing imidacloprid).

Do not graze treated areas or use clippings from treated areas for feed or forage.

Do not irrigate to point of runoff or puddling following application.

Do not apply to waterlogged, saturated, or frozen soils since this will prevent penetration to the root zone.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of 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.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex III, Inc., it is impossible for Ensystex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer, and User agree to hold Ensystex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable laws, Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex III shall not 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 ENSYSTEX III 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 ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Ensystex III, Inc.





TURFTHOR WP

For foliar and systemic control of listed insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses*, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

*Not registered for this use in California

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	<u>25.0%</u>
TOTAL:	100.0%

Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-3 EPA Est. 81824-NC-001

STOP – Read the label before use KEEP OUT OF REACH OF CHILDREN CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta gue la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	Call 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 to an unconscious person.
lf on skin or	Take off contaminated clothing.
clothing	Rinse skin immediately with plenty of water for 15 to 20 minutes.
	Call a poison control center or doctor for treatment advice.
If in eyes	Hold eye open and rinse slowly and gently with water for 15 to 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.
	HOTLINE NUMBER
	iner or label with you when calling a poison control center or doctor You may also contact 1-(866)-367-8467 for emergency medical
	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. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Keep children and pets off treated area until spray is dry.

Personal Protective Equipment: 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, nitrille rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton and shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: 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 pesticide 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 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.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

- Do not apply more than 8.6 ounces (0.4 lb. a.i.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.
- Do not apply in greenhouses or nurseries.
- Not for use on turf or plants being grown for sale, for commercial seed production, or for research purposes.
- Not for use on bearing fruit or nut trees.
- Do not apply through an irrigation system.

TURFTHOR WP is not registered for use on golf courses in the state of California.

STORAGE AND DISPUSAL

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

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

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: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available 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.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sween material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance

DILUTION AND MIXING OF TURFTHOR WP

To mix, measure out the required amount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating

Do not use kitchen utensils to mix or apply this product. Use equipment dedicated to pesticide measurement and application

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of listed soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites are lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses (not in California), cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual The active ingredient in 10RF1PDR vm-illimidationic, has suniciently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is moved prior to irrigation/rainfall

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications		
Use Rate	Ounces per acre	Teaspoons per 1,000 sq. feet
Α	6.4⇒8.6 ounces per acre	3⇒4 level teaspoons per 1,000 sq. ft.
В	8.6 ounces per acre	4 level teaspoons per 1,000 sq. ft.

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP = 0.05 oz. TURFTHOR WP

3 level teaspoons = 1 tablespoon

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate (8.6 ounces Turfthor WP per acre per year, 0.4 lb. imidacloprid per acre per year) is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate (8.6 ounces Turfthor WP per acre per year, 0.4 lb. imidacloprid per acre per year).

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly,

Green June beetle Japa beetle, Northern masked chafer, Oriental beetle, Phyllophaga spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application

Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of square

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. /1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Teaspoons TURFTHOR WP to use = A X B

Ounces TURFTHOR WP to use = A X B X 0.05

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Application Sites

For use on ornamental trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against listed insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker

Ornamental Application to Control Ants (except fire, pharaoh, harvester, carpenter ants)

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed up to a maximum of 0.4 lb. a.i. per acre per vear.

Mixing Table for TURFTHOR WP for Foliar Applications		
Gallons Water	Level Teaspoons TURFTHOR WP	
2.5	0.25	
5.0	0.50	
10.0	1.00	
25.0	2.50	
50.0	5.00	
100.0	10.00	

¹ level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP = 0.05 oz, TURFTHOR WP

³ level teaspoons = 1 tablespoon

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications

6.4⇒8.6 ounces per acre / 3⇒4.level teaspoons per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate (0.4 lb. a.i. per acre per year).

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optime effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites are landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses (not in California) and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH)*/
1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)*

*DBH = Diameter at Breast Height measured at 4.5 feet above the ground

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) */

1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)*

*DBH = Diameter at Breast Height measured at 4.5 feet above the ground

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height/

1 to 2 ounces per 30 cumulative feet of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height

1 to 2 ounces per 30 cumulative feet of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ADDITIONAL RESTRICTIONS

Do not apply more than 8.6 ounces of Turfthor WP per acre per year (0.4 lb. imidacloprid per acre per year of any product containing imidacloprid.)

Do not graze treated areas or use clippings from treated areas for feed or forage.

Do not irrigate to the point of runoff or puddling following application

Do not apply to waterlogged, saturated, or frozen soils since this will prevent penetration to the root zone.

IMPORTANT READ BEFORE USE

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[EPA approval date]