

83070-3

07-01-2008

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

James Messina  
Advan LLC  
300 Colonial Center Parkway, #203  
Roswell, GA 30076

JUL 1 2008

Dear Mr. Messina:

Subject: Labeling Amendment; Per Agency Email Dated June 13, 2008  
Enforce 1.47% FL  
EPA Registration No. 83070-3  
Date Submitted: June 30, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provision:

1. Delete all references to Asian Longhorned Beetles and Emerald Ash Borers throughout the label. To have these pests added back on in the future, acceptable efficacy data must be submitted or cited.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please call me at (703) 306-0415.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis  
Entomologist  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Enclosure

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

JUL 1 2008

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
83070-3

Enforce™ 1.47% FL  
Insecticide Concentrate

- Prevents damage from listed pests
- Insects stop eating when they feed on the plant
- Protects trees and shrubs from damaging insects with one easy treatment
- Helps keep trees and shrubs strong. Protects new growth
- Controls insects that damage trees and shrubs
- Year-long insect protection for trees and shrubs
- Treats up to 32" average size trees or 5 (2 ft. tall) shrubs
- Systemic insecticide is absorbed through the roots, carried up into the plant and won't wash off
- Prevents insects from damaging trees and shrubs
- Will not harm trees and shrubs
- For use on all ornamental trees, listed fruit & nut trees, and shrubs
- Kills insects & prevents new infestations
- One application protects up to 12 months
- Provides 12-Month Insect Protection
- Rainproof Protection
- Easy to use - Mix in water and pour around Tree/Shrub

FOR OUTDOOR RESIDENTIAL USE ONLY

Not for sale, sale into, distribution and or use in Nassau, Suffolk, Kings, and Queens counties of New York.

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine ..... 1.47%

OTHER INGREDIENTS: ..... 98.53%

TOTAL: ..... 100.00%

KEEP OUT OF REACH OF CHILDREN  
CAUTION

See Booklet for Additional Ingredients and Precautionary Statements

| FIRST AID  |  |
|--|--|
| If swallowed   | <ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul> |
| If in eyes   | <ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>   |
| 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 [CHEMTREC] for emergency medical treatment information. |  |

EPA Reg. No. 83070-3  
[AD010407]

EPA Est. No. xxxxxx-xx-xxx

NET CONTENTS: 8 fl. oz. or 16 fl. oz. or 32 fl. oz. or 1 Gal

Manufactured For:  
Advan, LLC  
Roswell, GA 30076

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

Children and pets may re-enter the treated area after it has dried.

ENVIRONMENTAL HAZARDS

- This pesticide is toxic to aquatic invertebrates. Do not apply directly to lakes, streams, rivers or ponds.
- Do not dump rinse water into sewers or other bodies of water.
- Apply this product only as specified on this label.

Enforce™ 1.47% FL Insecticide Concentrate provides 12-month systemic protection against damaging insects including Leafminers, Beetles and Borers.

Having beautiful trees and shrubs has never been easier.

QUICK FACTS

Provides Year Long Insect Protection

- Will Not Harm Trees and Shrubs
- Easy to Use ... Pour in Water and Pour Around Plant
- Not Affected by Rain or Moisture
- Convenient Measuring Cup
- Kills adelgids, aphids, bronze birch borers, leafminers, scale and other listed pests
- Coverage for Trees: 32 inches of distance around tree(s) and Coverage for Shrubs: 5 (2 ft tall)
- Outdoor trees and shrubs, including listed fruit and nut trees
- Use once a year or when insects are present
- Trees Use: 1 ounce per inch of distance around trunk
- Shrubs Use: 3 ounces per foot of height

| DIRECTIONS FOR USE   |   |
|--|---|
| It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. For best results, read and follow all label directions. |   |
| BEFORE YOU USE<br><br>Read and follow directions when using.   | <ul style="list-style-type: none"> <li>• Do not apply near lakes, streams, rivers, or ponds.</li> <li>• Do not apply to soils which are water-logged or saturated.</li> <li>• Bucket or measuring utensils should not be used for any food or drinking water purposes after use with this product.</li> </ul> |
| HOW TO USE   | Determine the amount to use by measuring the distance around the tree trunk or height of the shrub. Pour the required amount into a bucket of water and empty the bucket around the base of the tree/shrub.   |
| FOR USE ON   | Outdoor trees and shrubs including listed fruit and nut trees:  |

| DIRECTIONS FOR USE |  |                            |                       |
|--------------------|--|----------------------------|-----------------------|
|                    | Apple<br>Crabapple<br>Pecan  | Loquat<br>Mayhaw<br>Quince | Oriental Pear<br>Pear |
| CONTROLS           | Adelgids<br>Billbug<br>Crane fly larvae<br>Leaf Beetles (including Elm Leaf Beetles and Viburnum Leaf Beetles)<br>Vine Weevil Larvae (Including Black Vine Weevil)<br>Leafhoppers (including Glassy-winged Sharpshooter)<br>Roundheaded Borers (Including Asian Longhorned Beetle and Eucalyptus Longhorned Borer)<br>Flatheaded (Including Bronze Birch Alder, and Emerald Ash Borers)<br>Leafminers (Including Birch Leafminers)<br>Mealybugs<br>Pine Tip Moth Larvae<br>Japanese Beetles, Adult<br>Psyllids<br>Lacebugs<br>Royal Palm Bugs<br>Sawfly Larvae<br>Scales (Includes Armored Scale [Suppression] and Soft Scale)<br>Thrips<br>Whiteflies |                            |                       |
| HOW MUCH TO APPLY. | Trees: 1 oz per inch of distance around trunk<br>Shrubs: 3 oz per foot of height.  |                            |                       |
|                    | <b>TREE WITH ONE TRUNK:</b><br><br>Measure distance (in inches) around tree trunk at chest height. A flexible tape measure is the recommended method [tool]. This is the number of ounces of Enforce™ 1.47% FL to apply.   |                            |                       |
|                    | <b>TREES WITH 2 OR MORE TRUNKS:</b><br><br>Measure the distance (in inches) around each tree trunk and add together. Multiply this total by 0.75 to get the required number of ounces of Enforce™ 1.47% FL to apply.<br><br>Example: A tree has 4 trunks. They measure 20, 10, 5 and 5 [inches] or a total of 40 [inches], 40 X 0.75 = 30 ounces.  |                            |                       |
|                    | <b>SHRUBS:</b><br><br>Measure the height of the shrub to the nearest foot. Round any inches down to the nearest foot if less than 6" and up to the nearest foot if greater than 6". Multiply the number of feet by 3 - this is the number of ounces of Enforce™ 1.47% FL to apply.<br><br>Do not make more than one application per year.  |                            |                       |

| DIRECTIONS FOR USE          |   |
|-----------------------------|---|
| HOW TO APPLY                | <ul style="list-style-type: none"> <li>• Fill a bucket or watering can with 1 gallon of water. [For trees with circumference greater than 50', use 2 gallons of water.]</li> <li>• Shake the bottle of Enforce™ 1.47% FL well.</li> <li>• Remove the measuring cup. [Each marking inside is one ounce.]</li> <li>• Carefully measure required amount of product into bucket.</li> <li>• Slowly pour the solution evenly around the tree. For best results, pour as close to the TRUNK/main stem of the tree/shrub as possible.</li> <li>• Fill the bucket with clean water and pour it around the trunk as well.</li> </ul> |
| FOR BEST RESULTS            | <p>Use this product as part of an overall tree and shrub health care program before problems start [preferably in the fall]. However, Enforce™ 1.47% FL can be applied anytime except when the ground is waterlogged or frozen. These conditions inhibit the movement of the product down into the root zone.</p> <p>During prolonged dry periods [spells], water the tree/shrub well the night before making an application.</p> <p>For severe infestations, treat with a foliar insecticide labeled for use on ornamentals then use Enforce™ 1.47% FL as part of a routine care program.</p>                              |
| HOW Enforce™ 1.47% FL WORKS | <p>The insecticide dissolved in water moves down through the soil, where it is absorbed by the roots. Once absorbed, it moves up through the tree or shrub providing year-long insect protection. Enforce™ 1.47% FL even moves into new growth after application, thus protecting it, too. To get complete protection, the insecticide must distribute completely through the tree/shrub. Depending on the size and health of the plant, this may take one week to three months (for very large trees). Rain or water cannot wash off this internal protection.</p>   |

(NOTE: Application to trees heavily infested may not prevent their eventual loss due to existing pest damage and tree stress)

| IMPORTANT- DIRECTIONS FOR STORAGE AND DISPOSAL   |
|--|
| <p>Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.</p> <p>IF EMPTY:</p> <ul style="list-style-type: none"> <li>• Do not reuse container.</li> <li>• Place empty container in trash or offer for recycling if available.</li> </ul> <p>IF PARTLY FILLED:</p> <ul style="list-style-type: none"> <li>• Call your local solid waste agency for disposal instructions.</li> <li>• Never place unused product down any indoor or outdoor drain.</li> </ul> |

**WARRANTY AND LIMITATION OF DAMAGES**

**CONDITIONS OF SALE:** The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Advan, LLC. To the extent allowed by law, all such risks shall be assumed by the user or buyer. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ADVAN, LLC DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ADVAN, LLC SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL, OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, AND ADVAN, LLC SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER AND USER ACKNOWLEDGE AND ASSUME ALL RISKS AND LIABILITY RESULTING FROM HANDLING, STORAGE AND USE OF THIS PRODUCT. ADVAN, LLC DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**

**NOTES:**