

83100-12

12/12/2013

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



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Rotam Agrochemical Company Ltd
c/o Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

DEC 12 2013

Subject: Amended label adding pollinator protection language
Product Name: Rotam® Imidacloprid 70WG Insecticide
EPA Reg. No. 83100-12
EPA Decision No. 484416
Submission dated October 21, 2013

Dear Ms. Wagner:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable. A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. See 40 CFR 156.10(a)(6).

Under 40 CFR 152.130(d), EPA may establish dates by which all product distributed or sold by the registrant must bear revised labeling. The following paragraphs set forth the schedule for ensuring that that your product bears revised labeling within a reasonable time period.

- Any product released for shipment after 2/28/14 must bear the new label.

If these conditions are not complied with, EPA will take appropriate action against this registration. If you have any questions please contact Dr. Debra Rate at 703-306-0309 or rate.debra@epa.gov.

Regards,

A handwritten signature in black ink that reads "Venus Eagle".

Venus Eagle, Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

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Rotam Imidacloprid 70WG Insecticide

For Foliar and systemic insect control on turfgrass (including sod farms), nursery, greenhouse, commercial and residential landscape ornamentals and interior plantscapes.

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 70%

OTHER INGREDIENTS 30%**Total:** **100%**

EPA Reg. No. 83100-12

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN
CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. (If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

Manufactured by:

Rotam Agrochemical Company Ltd
7/F Cheung Tat Center
No. 18 Cheung Lee Street
Chaiwan, Hong Kong

NET CONTENTS: _____

ACCEPTED**DEC 12 2013**

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

EPA. Reg. No: 83100-12

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PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if inhaled. Harmful if swallowed. Causes moderate eye irritation. Avoid breathing dust. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Avoid contact with eyes or skin.

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

Engineering controls statements:

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

User Safety Recommendations**User 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.

FIRST AID

| | |
|---|--|
| 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 mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice. |
| If swallowed | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| If in eyes | <ul style="list-style-type: none"> • 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. |
| In case of emergency call your local poison control center for assistance. Have a product container or label with you when calling a poison control center or doctor, or going for treatment. | |
| Note To Physician: No specific antidote is available. Treat the patient symptomatically. | |

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 blooming crops/plants or weeds. Do not apply this product or allow it to drift to blooming crops/plants or weeds if bees are foraging 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.

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Do not formulate this product into other end-use products.

PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.



Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar. Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When Using This Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator attractive plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at:

<http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>.

Pesticide incidents (for example, bee kills) should immediately be reported to the state/tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at: www.npic.orst.edu or directly to EPA at: beekill@epa.gov

DIRECTIONS FOR USE

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

See individual crops for specific pollinator protection application restrictions. If none exist under the specific crop, for foliar applications, follow these application directions for food/feed & commercially grown ornamentals that are attractive to pollinators and non-agricultural use sites.

**1. FOR FOOD CROPS AND COMMERCIALY GROWN ORNAMENTALS NOT UNDER CONTRACT FOR POLLINATION SERVICES BUT ARE ATTRACTIVE TO POLLINATORS**

Do not apply this product while bees are foraging. Do not apply this product until flowering is complete and all petals have fallen unless one of the following conditions is met:

- The application is made to the target site after sunset
- The application is made to the target site when temperatures are below 55°F
- The application is made in accordance with a government-initiated public health response
- The application is made in accordance with an active state-administered apiary registry program where beekeepers are notified no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying
- The application is made due to an imminent threat of significant crop loss, and a documented determination consistent with an IPM plan or predetermined economic threshold is met. Every effort should be made to notify beekeepers no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying.

**2. Non-Agricultural Use Sites:**

Do not apply while bees are foraging. Do not apply this product to plants that are flowering. Only apply after all flower petals have fallen off.

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.

RESTRICTIONS:

- Do not exceed a total of 9.0 oz. (0.4 lb. of active ingredient) per acre per year.
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the state of Oregon.

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

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

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

NON-AGRICULTURAL USE REQUIREMENTS

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

Keep children and pets off treated area until dry.

CHEMIGATION

Refer to **DIRECTIONS FOR USE** section before proceeding with chemigation application.

Rotam Imidacloprid 70WG Insecticide may be applied at rates specified 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 1:20, 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.

- Remove scale, pesticide residue and other foreign matter from the tank and entire irrigation system.
- Apply Rotam Imidacloprid 70WG Insecticide only through micro irrigation (individual spaghetti tube), drip irrigation, overhead irrigation, 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 nonuniform distribution of treated water.
- 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.
- 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, 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.

- 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.
- 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 over-flow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.
- The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
- 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 inter-lock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- 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.
- 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.
- 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:

- 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 back flow.
- The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
- 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 inter-lock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- 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.
- 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.
- Do not apply when wind speed favors drift beyond the area intended for treatment.

TURFGRASS APPLICATIONS

Rotam Imidacloprid 70WG Insecticide can be used for the control of soil inhabiting pests of turfgrass, including Northern & Southern masked chafers, *Cyclocephala borealis*, *C. immaculate*, and/or *C. lurida*; Asiatic garden beetle, *Maladera castanea*; European chafer, *Rhizotrogus majalis*; Green June Beetle, *Cotinis nitida*; May or June beetle, *Phyllotreta* spp.; Japanese beetle, *Popillia japonica*; Oriental beetle, *Anomala orientalis*; Billbugs, *Sphenophorus* spp.; Annual bluegrass weevil, *Hyperodes* spp.; Black turfgrass ataenius, *Ataenius spretulus* and *Aphodius* spp.; and European Crane Fly, *Tipula paludosa*. Rotam Imidacloprid 70WG Insecticide can also be used for the suppression of mole crickets, cutworms, and chinchbugs in turfgrass areas. Rotam Imidacloprid 70WG Insecticide can be used as directed on turfgrass, home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, athletic fields and sod farms.

The active ingredient in Rotam Imidacloprid 70WG Insecticide has sufficient residual activity so that applications can be made preceding the egg laying activity of the target pests. High levels of control can be achieved when applications are made preceding or during the egg laying period. 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. Greatest control will result from applications made prior to egg hatch of the target pest. Applications require rainfall or sufficient irrigation post-treatment to move the active ingredient thru the thatch. Do not apply if the soil is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist. The treated turf area must be in such a condition that the rainfall or irrigation will penetrate vertically in the soil profile.

Application Equipment for Use on Turfgrass

Apply Rotam Imidacloprid 70WG Insecticide in sufficient water to provide adequate distribution in the treated area. The use of accurately calibrated equipment normally used for the application of turfgrass insecticides is required. Use equipment, which will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off target drift. Check calibration periodically to ensure that equipment is working properly.

| APPLICATIONS | | |
|--|---|--|
| Application Site/Crop | Pest | Rate Rotam Imidacloprid 70WG Insecticide |
| Turfgrasses | Larvae of: Annual bluegrass weevil Asiatic garden beetle Billbug Black turfgrass ataenius Chinchbug (suppression) Cutworm (suppression) European chafer European Crane Fly Green June beetle Japanese beetle Mole crickets (suppression) Northern masked chafer Oriental beetle <i>Phyiophaga</i> spp. Southern masked chafer | 6.0 to 9.0 oz. Or 3.0 to 4.0 tsp.* per 1,000 sq. ft. |
| | *1 level teaspoon = 4 grams For greater control of grubs, billbugs, annual bluegrass weevil and European crane fly larvae: Make application prior to egg hatch of the target pest. Be sure to read “ APPLICATION EQUIPMENT ON TURFGRASS ” Section of this label. | |
| | For suppression of chinchbugs: Make application prior to hatching of the first instar nymphs. | |
| | For suppression of mole crickets: Make application prior to or during the peak egg hatch period. Follow label instructions for other insecticides when tank-mixing. | |
| Consult your local State Agricultural Experiment Station or State Extension Turf Specialists for more specific information regarding timing of application. | | |
| Restrictions: Irrigation or rainfall must occur within 24 hours after application to move the active ingredient through the thatch. <ul style="list-style-type: none">Do not apply more than 9.0 oz. (0.4 lb. of active ingredient) per acre per year.Do not mow turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.Do not allow this product to contact plants in bloom while bees are foraging the treatment area.Do not graze treatment areas or use clippings from treated areas for feed or forage.Do not allow runoff or puddling of irrigation water following application.Keep children and pets off treated area until dry. | | |

- Do not apply Rotam Imidacloprid 70WG Insecticide to areas which are water logged or saturated, which will not allow penetration into the root zone of the plant.
- Do not use for seed production.

ORNAMENTAL APPLICATIONS

Commercial and Residential Landscape

Rotam Imidacloprid 70WG Insecticide is for use on ornamentals in commercial and residential landscapes and interior plantscapes. Rotam Imidacloprid 70WG Insecticide is a systemic product and will be translocated upward into the plant system from root uptake. The product must be placed where the growing portion of the target plant can absorb the active ingredients. Application can be made by foliar applications or soil applications, including soil injection, drenches, and broadcast sprays. Foliar applications offer locally systemic activity against insect pests.

When making soil applications to plants with woody stems, systemic activity will be delayed until the active ingredient is translocated throughout the plant. In some cases, this translocation delay could take 60 days or longer. For this reason, greatest control will result from applications made prior to anticipated pest infestation.

Restrictions

For broadcast applications to outdoor ornamentals do not exceed a total of 9.0 oz. (0.4 lb. of active ingredient) per acre per year.

Application Equipment for Foliar Applications

Rotam Imidacloprid 70WG Insecticide mixes readily with water and may be used in many types of application equipment. Mix product with the required amount of water and apply as desired dependent upon the selected use pattern.

When making foliar applications on hard to wet foliage, such as holly, pine, or ivy, include the addition of a spreader/sticker. If concentrate or mist type spray equipment is used, an equivalent amount of product must be used on the area sprayed, as would be used in a dilute application.

Do not apply through any irrigation system.

Mixing

To prepare the spray mixture, add the appropriate amount of product as determined under "Application Equipment for Foliar Applications" into the spray tank while filling with water to the desired level. Operate the agitator while mixing.

Rotam Imidacloprid 70WG Insecticide has been found to be compatible with commonly used fungicides, miticides, liquid fertilizers, and other commonly used insecticides. Check physical compatibility using the correct proportion of products in a small jar test if local experience is unavailable.

Ant Management Programs

Use Rotam Imidacloprid 70WG Insecticide to control aphids, scale insects, mealybugs, and other sucking pests on ornamentals to limit the honeydew available as a food source for ant populations. Rotam Imidacloprid 70WG Insecticide applications can then be supplemented with residual sprays, bait placements, or other ant control tactics to further reduce the pest population.

Applications for Use only in and on Industrial and Commerical Building Grounds and Residential Areas

| APPLICATIONS | | |
|---|---|---|
| Application Site | Pest | Rate Rotam Imidacloprid 70WG Insecticide |
| Trees Shrubs Evergreens Flowers Foliage plants Groundcovers Interior landscapes | Adelgids Aphids Japanese beetle Lace bugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Mealybugs Psyllids Sawfly larvae Thrips (suppression) Whiteflies | 1 tsp. per 10 gal. of water |
| | Foliar Applications: Start treatments prior to establishment of high pest populations and reapply on an as needed basis | |
| | White grub larvae (such as Japanese beetle larvae, Chafers, <i>Phyiophaga</i> spp. Asiatic garden beetle, Oriental beetle) | 3.0 to 4.0 tsp.* per 1,000 sq. ft. |
| | Broadcast Application: Mix required amount of product in sufficient water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of water per 1,000 sq. ft. Irrigate thoroughly to incorporate Rotam Imidacloprid 70WG Insecticide into the upper soil profile. | |
| *1 level teaspoon = 4 grams | | |
| Restrictions: | | |
| • Do not apply this product, by any application method, to linden, basswood or other <i>Tilia</i> species in the state of Oregon. | | |

Application to Trees, Shrubs, Flowers and Groundcovers

(For Use only in and around industrial and commercial buildings, and residential areas and state, national, and private wooded and forested areas to control the insect pests listed below.)

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| Trees | Apply 1.0 to 1.5 level tsp.* Rotam Imidacloprid 70WG Insecticide per inch of cumulative trunk diameter, or 1.0 to 2.0 oz. per 30 cumulative inches trunk diameter. |
| <p>*1 teaspoon = 4 grams</p> <p>Restrictions:</p> <ul style="list-style-type: none"> Do not apply this product, by any application method, to linden, basswood or other <i>Tilia</i> species in the state of Oregon. <p>Soil Injection:</p> <p>Grid Application: Space holes on 2.5-foot centers, in a grid pattern, extending to the drip line of the tree.</p> <p>Circle Application: Apply to evenly spaced holes approximately 1 to 3 feet apart in a circle in the tree drip-line. More circles may be needed for larger trees.</p> <p>Basal Application: 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. Keep the treated soil moist for 7 to 10 days.</p> | |

Do not use less than 4 holes per tree.

No Soil Injection Applications Allowed in Nassau or Suffolk Counties of New York.

Soil Drench: Uniformly apply the dosage in no less than 10 gallons of water per 1,000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.

For control of Specified Borers: Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing pest damage and tree stress.

| | |
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| Shrubs | Apply 1.0 to 1.5 level tsp.* Rotam Imidacloprid 70WG Insecticide per foot of shrub height, or 1.1 to 2.1 oz. per 30 cumulative feet of shrub height. |
|---------------|--|

*1 teaspoon = 4 grams

Soil Injection: Apply to individual plants using dosage indicated. 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. Keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per shrub.

No Soil Injection Applications Allowed in Nassau or Suffolk Counties of New York.

Soil Drench: Uniformly apply the dosage in no less than 10 gallons of water per 1,000 square feet as a drench around the base of the shrub, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.

| | |
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| Flowers and Groundcovers | Apply 3.0 to 4.0 level tsp. Rotam Imidacloprid 70WG Insecticide per 1,000 sq. ft. |
|---------------------------------|---|

Apply as a broadcast soil treatment and incorporate into the soil before planting or apply after plants are established prior to bloom or after all petals have fallen off. If application is made to established plants irrigated thoroughly after application.

Applications for use only in Residential Areas

| Site | Pest | Rate | |
|---------------------|--|-------------|------------------|
| Pome Fruits: | Aphids (except Woolly apple aphid) | 0.5 fl. oz. | 2.0 oz. per acre |
| Apple | | | |
| Crabapple | Leafhoppers (including glassy winged sharpshooter) | | |
| Loquat | | | |
| Mayhaw | Leafminer | | |
| Pear* | Mealybugs* | | |
| Pear (Oriental) | San Jose Scale* | | |
| Quince | | | |

Apply specified dosage as foliar spray as needed after petal-fall is complete. For control of rosy apple aphid, apply prior to leafrolling caused by the pest. For first generation leafminer control, make first application as soon as petal-fall is complete. Greatest leafminer control will result from the earliest possible application. For second and succeeding generations of leafminer best control is obtained from applications made early in the adult flight against egg and early instar larvae. A second application may be required 10 days later if severe pressure continues or if generations are overlapping. A single application may result in suppression only. Rotam Imidacloprid 70WG Insecticide will not control late stage larvae. For San Jose Scale, time applications to the crawler stage. Treat each generation. For late season (preharvest) control of leafhopper species, apply Rotam Imidacloprid 70WG Insecticide while most leafhoppers are in the nymphal stage. For control of mealybug, insure good spray coverage of the trunk and scaffolding limbs or other resting sites of the mealybug.

Restrictions:

- Follow application restrictions for Non-Agricultural Use Sites on page 6 to protect bees and other insect pollinators.
- Do not apply more than 2.0 ounces per acre in a single application.
- Do not make more than 4 applications.
- Allow 10 or more days between applications.
- Do not apply more than 9 ounces (0.4 lb. active ingredient) per acre per year.
- Allow at least 7 days between last application and harvest.
- Keep children and pets off treated area until dry.

*Not for use in California for control on pears.

| | | | |
|--------------|--|-------------|------------------|
| Pecan | Yellow pecan aphid Black margined aphid Pecan leaf phylloxera Pecan spittlebug Pecan stem phylloxera | 0.5 fl. oz. | 2.0 oz. per acre |
|--------------|--|-------------|------------------|

Make foliar applications as pests begin to build before populations become extreme. Two applications at a 10- to 14-day interval may be required to achieve control. Scout and retreat if needed. Thorough uniform coverage of foliage is necessary for control. Addition of an organosilicone-based spray adjuvant as a rate not to exceed the adjuvant manufacturer's recommended use rate may improve coverage.

Restrictions:

- Follow application restrictions for Non-Agricultural Use Sites on page 6 to protect bees and other insect pollinators.
- Do not apply more than a total of 6.0 ounces of Rotam Imidacloprid 70WG Insecticide per acre per year.
- Do not make more than 3 applications. Allow 10 or more days between applications.
- Allow at least 7 days between last application and harvest.
- Keep children and pets off treated area until dry.

The amount of Rotam Imidacloprid 70WG Insecticide required per acre will depend on tree size and volume of foliage present. The rate per acre is based on a standard of 400 gallons of dilute spray solution per acre for large trees.

| | | | |
|---------------|---|-------------|------------------|
| Grapes | Leafhoppers (including glassy-winged sharpshooter) Mealybugs | 0.5 fl. oz. | 2.0 oz. per acre |
|---------------|---|-------------|------------------|

Apply specified dosage as a foliar spray using 200 gallons of water per acre.

Restrictions:

- Follow application restrictions for Non-Agricultural Use Sites on page 6 to protect bees and other insect pollinators.
- Do not apply more than a total of 2.0 ounces of Rotam Imidacloprid 70WG Insecticide per acre per year.
- Allow at least 14 days between applications.
- Applications may be applied up to and including day of harvest. Keep children and pets off treated area until dry.

Restrictions

Do not graze treated areas or use clippings from treated areas for feed or forage. Do not apply to runoff or puddling of irrigation water following application. Keep children and pets off treated area until dry. Avoid application of Rotam Imidacloprid 70WG Insecticide to areas which are water logged or saturated, or frozen, which will not allow penetration into the root zone of the plant. Do not apply more than 9.0 oz. (0.4 lb. of active ingredient) per acre per year.

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.

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

Nurseries (field and containerized, including forest nurseries), Greenhouses, and Interior Plantscapes

Rotam Imidacloprid 70WG Insecticide is a systemic product which provides insect control on ornamental and vegetable plants in nurseries, greenhouses, and interior plantscapes. Apply this product as a soil treatment only. Rotam Imidacloprid 70WG Insecticide will be translocated upward within the plant. To assure effectiveness, the product must reach the roots of the plant so that they can absorb the active ingredient. Irrigate moderately but thoroughly after application. Do not allow leaching or runoff from containers for at least three irrigations or 10 days, whichever is longer.

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. To aid in resistance management, foliar application of any chloronicotinyl insecticide following a Rotam Imidacloprid 70WG Insecticide soil application in the same crop is not recommended.

Incorporate Rotam Imidacloprid 70WG Insecticide by means of cultivation, irrigation, rainfall, mechanical placement, soil injection, drenching, and broadcast sprays.

Woody Perennials

Protection to insect control occurs more slowly than in herbaceous species, and a delay of 2 or more weeks should be expected. Longer delays must be expected with larger plants. Therefore, it is best to apply well before expected insect activity.

Bark Media

Media with 30 to 50% or more bark content may confer a shorter period of insect control when treated with Rotam Imidacloprid 70WG Insecticide.

Tank Mixes

Rotam Imidacloprid 70WG Insecticide has been found to be compatible with commonly used liquid fertilizers, fungicides, and insecticides. Confirm physical compatibility using the correct proportion of products in a small jar test if local experience is unavailable.

Application to Grassy Areas in Nurseries

Use Rotam Imidacloprid 70WG Insecticide as directed on nursery grass in sites such as under or around field or container grown plants, on roadways or other grassy areas in or around nurseries. Do not use Rotam Imidacloprid 70WG Insecticide on commercial sod farms.

Insects Controlled

Soil inhabiting pests of grassy areas of nurseries such as:

North and Southern masked chafers, *Cyclocephala borealis*, *C. immaculate*, and/or *C. lurida*

Asiatic garden beetle, *Maladera castanea*

European chafer, *Rhizotroqus majalis*

Green June beetle, *Cotinis nitida*

May or June beetle, *Phyllophaga* spp.

Japanese beetle, *Popillia japonica*

Oriental beetle, *Anomala orientalis*

Billbugs, *Sphenophorus* spp.

Annual bluegrass weevil, *Hyperodes* spp.

Black turfgrass atenius, *Atenius spretulus* and *Aphodius* spp.

Insects Suppressed

Cutworms, hairy chinchbugs, and mole crickets.

Greatest control will result from applications made prior to, or during egg lay period for target pests. Applications require rainfall for sufficient irrigation post-treatment to move the active ingredient through the thatch. The active ingredient in Rotam Imidacloprid 70WG Insecticide has sufficient residual activity so that applications can be made preceding the egg laying activity of the target pests. Use historical monitoring data of the site, previous records or experiences, current season adult trapping or other methods to determine the need for application.

Do not apply when grassy areas are waterlogged or the soil is saturated with water, as adequate distribution of the active ingredient cannot be achieved. Rainfall or irrigation must be able to vertically penetrate in the soil profile. Do not apply more than a total of 9.0 oz. (0.4 lb. of active ingredient) per acre per year.

Application Equipment for use on Grassy Areas in Nurseries

Apply Rotam Imidacloprid 70WG Insecticide in enough water to provide adequate coverage of the treated area. Use accurately calibrated equipment normally used for soil application. Use equipment that will produce a uniform coarse droplet spray, with a low pressure setting to eliminate off-target drift. Check calibration regularly to confirm that equipment is working properly.

Application for Containerized Nursery and Greenhouse Grown Plants Drench and Irrigation Applications for use only on Ornamental and Vegetable Plants in Greenhouses, Nurseries, and Interior Plantscapes using Soil Drenches, Micro-Irrigation, Drip Irrigation, Overhead Irrigation, Ebb and Flood Irrigation, or Hand-Held or Motorized Calibrated Irrigation Equipment

Application Rates for Containerized Nursery and Greenhouse Grown Plants

| Pest | Use Pattern | | Rate Rotam Imidacloprid 70WG Insecticide | | Directions |
|---|-------------------------|--|---|--------------|--|
| Adelgids | Plants in Containers | Herbaceous | Container | No. Pots | Distribute 0.5 oz. of Rotam Imidacloprid 70WG Insecticide evenly in the specified number of pots, using sufficient water volume to wet potting medium without loss of liquid through leaching. Apply according to label directions. Use moderate irrigation after each application. Irrigate carefully during the next 10 days in order to avoid loss of active ingredient due to leaching. |
| Aphids | | Species – | Sizes | Treated with | |
| Armored Scale (suppression) | | Including | (Inches) | 0.5 Oz. | |
| Fungus Gnats (larvae only) | | Vegetable | 2 | 3,000 | |
| Japanese Beetle (adults) | | plants ⁵ (1 or 2 | 3 | 2,000 | |
| Lacebugs | | Plants per Pot) | 4 | 1,500 | |
| Leaf Beetles (including elm and viburnum leaf beetles) | | | 5 | 1,200 | |
| Leafhoppers (including glassy-winged sharpshooter) | | | 6 | 1,000 | |
| Leafminers | | | 7 | 850 | |
| Mealybugs | | | 8 | 750 | |
| Psyllids | | | 9 | 675 | |
| Root mealybugs ² (Such as Black Vine Weevil, Citrus Root Weevil ³) | | | 10 | 600 | |
| Soft Scale | | 11 | 550 | | |
| Thrips (suppression) ⁴ | | 12 | 500 | | |
| White Grub Larvae (such as Japanese Beetle, Masked Chafers, | | | | | |
| | | Woody | 2 | 2,000 | |
| | | Perennial | 3 | 1,350 | |
| | | Species | 4 | 1,000 | |
| | | | 5 | 800 | |
| | | | 6 | 650 | |
| | | | 7 | 550 | |
| | | | 8 | 500 | |
| | | | 9 | 450 | |
| | | | 10 | 400 | |
| | | | 11 | 350 | |
| | | | 12 | 300 | |
| | | Herbaceous | | | |
| | | Species – | | | |
| | | including | | | |
| | | Vegetable ⁵ | | | |
| | | plants (three or more plants per pot | | | |

| | | | | |
|---|---|-----------------------------|----------------------------|--|
| European Chafer, Oriental Beetle Asiatic Garden Beetle) Whiteflies | Ornamental and vegetable ⁵ plants grown in flats, benches, or beds | 0.5 ounce per 3,000 sq. ft. | | Mix required amount in enough water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of mixture per 1,000 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, greater control will be attained if areas are lightly irrigated after application. Allow no leaching or runoff for 10 days after application. |
| | Containerized Plants | Container Size | No. Pots Treated with 1 | Apply in enough water to wet the potting medium. Greatest control will be obtained when applications are made before egg hatch of the target pest. Irrigate moderately after application to move the active ingredient into the root. |
| | | 1 gal. | oz. | |
| | | 2 gal. | 240-120 | |
| | | 3 gal. | 120-60 | |
| | | 5 gal. | 90-40 | |
| | | | 65-30 | |

¹**Fungus gnat larvae** in the soil will be controlled by drench or incorporation. **No adult Fungus Gnat control.** Other foliar insect control is achieved by the uptake of Rotam Imidacloprid 70WG Insecticide from a healthy root system translocating the active ingredient up into the plant.

²**Root Mealybug** control will require a thorough drenching on containerized media. Coverage is essential for control while minimizing the amount of leachate. Rate: 1.0 ounce in 250 gallons of water.

³**Citrus Root Weevil:** For use on non-bearing citrus nursery stock.

⁴**Thrips** suppression on foliage only. Thrips in buds and flowers will not be suppressed.

⁵**Restrictions:** 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.

Restrictions

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soils which 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 Rotam Imidacloprid 70WG Insecticide cannot exceed a total of 9.0 oz. (0.4 lb. 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.

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

Application to Field Grown and Forest Nursery Plants

| Pests | Directions |
|----------|------------|
| Adelgids | TREES |

| | |
|---|---|
| <p>Aphids Armored scales (suppression) Black vine weevil larvae Eucalyptus longhorned borers Flatheaded borers (including bronze birch and alder borers) Japanese beetles (adults) Lacebugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassy-winged sharpshooter) Leafminers Mealybugs Pine tip moth larvae Psyllids Royal Palm Bugs Sawfly larvae Soft scales Thrips (suppression) White grub larvae Whiteflies White Grub larvae (such as: Japanese Beetle, Masked Chafer, European Chafer, Oriental Beetle, Asiatic Garden Beetle)</p> | <p>Apply 0.5 oz. per 8-16 inches of cumulative trunk diameter D.B.H.</p> <p>Restrictions:</p> <ul style="list-style-type: none"> Do not apply this product, by any application method, to linden, basswood or other <i>Tilia</i> species in the state of Oregon. <p>Soil Injection: GRID SYSTEM: Using a grid pattern, space holes on 2.5 foot centers, extending to the drip line of the tree. CIRCLE SYSTEM: Apply to evenly spaced holes approximately 1-3 feet apart in a circle in the tree drip-line. More circles may be needed for larger trees. BASAL SYSTEM: Space injection holes evenly around the base of the tree trunk no more than 6-12 inches out from the base.</p> <p>Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Use low pressure and sufficient solution for distribution of the liquid into the treatment zone. Keep the treated area moist for 7 to 10 days. Use a minimum of 4 holes per tree.</p> <p>NO SOIL INJECTION APPLICATION ALLOWED IN NASSAU OR SUFFOLK COUNTIES OF NEW YORK.</p> <p>Soil Drench: Uniformly apply the dosage in at least 10 gallons of water per 1,000 square feet as a drench around the base of the tree. Direct to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.</p> <p>For Control of Specified Borers: 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>SHRUBS Apply 0.5 oz. per 8-16 feet of cumulative shrub height. Soil Injection: Apply to individual plants using dosage indicated. 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. Keep the treated area moist for 7 to 10 days. Use a minimum of 4 holes per shrub.</p> <p>NO SOIL INJECTION APPLICATION ALLOWED IN NASSAU OR SUFFOLK COUNTIES OF NEW YORK. Soil Drench: Uniformly apply the dosage in at least 10 gallons of water per 1,000 square feet as a drench around the base of the shrub, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.</p> <p>Field and Forest Nurseries Mow vegetation in the area to be treated to a height of 3 inches or less before application. Mowing to the lowest possible height will provide more control. Apply May through July. Application requires rainfall or sufficient irrigation post-treatment. Do not use less than 2 gallons of spray volume per 1,000 square feet.</p> <p>Apply as a uniform band on either side of the 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. Use one ounce per 1,000 ft. of row or 3,000 sq. ft.</p> <p>For grub control in turf areas, make a broadcast application using one ounce per 3,000 sq. ft.</p> |
| <p>Flowers and Ground Covers</p> | <p>Apply 0.5 oz. per 5,000 sq. ft. Rotam Imidacloprid 70WG Insecticide as a broadcast soil treatment and incorporate into</p> |

the soil before planting or apply after plants are established prior to bloom or after all petals have fallen off. If application is made to established plants, greater control will be attained if area is irrigated thoroughly after application.

Ebb & Flood Application

Rotam Imidacloprid 70WG Insecticide may be applied through Ebb and Flood applications. To assure adequate uptake prior to treatment, a minimum of 10 plants should be brought up to a known field capacity and allowed to dry out for one or two days. Re-wet the same plants to determine how much water on average each plant will absorb to bring it back at field capacity. Use the volume absorbed per plant (keeping pot sizes uniform) multiplied to flood your smallest treatment area. This should minimize the return back to the storage tank. Re-use the returned volume with subsequent irrigation or nutrients on the same plants.

| Rotam Imidacloprid 70WG Insecticide Ebb & Flood Applications | | |
|--|--|---|
| 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 Chafers, Oriental Beetle, Asiatic Garden Beetle) |
| Pot Sizes (inches) | Number of Pots Treated with 0.5 Ounces | |
| | Herbaceous Species including Vegetable Plants ⁵ (one or two plants per pot) | Woody Perennials, Herbaceous species including Vegetable Plants ⁵ (3 or more per pot) |
| 2 | 2,000 | 2,000 |
| 3 | 2,000 | 1,350 |
| 4 | 1,500 | 1,000 |
| 5 | 1,200 | 800 |
| 6 | 1,000 | 650 |
| 7 | 850 | 550 |
| 8 | 750 | 500 |
| 9 | 675 | 450 |
| 10 | 600 | 400 |
| 11 | 550 | 350 |
| 12 | 500 | 300 |

¹Fungus gnat larvae in the soil will be controlled by drench or incorporation. **No adult Fungus Gnat control.** Other foliar insect control is achieved by the uptake of Rotam Imidacloprid 70WG Insecticide from a healthy root system translocating the active ingredient up into the plant.

²Root Mealybug control will require a thorough drenching on containerized media. Coverage is essential for control while minimizing the amount of leachate. Rate: 1.7 ounce in 150 gallons of water.

³Citrus Root Weevil: For use on non-bearing citrus nursery stock.

⁴Thrips suppression on foliage only. Thrips in buds and flowers will not be suppressed.

⁵Restrictions: 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.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store in a tightly closed container in a cool, dry place.

Pesticide Disposal: Pesticide spray mixture or rinsate that cannot be used or chemically reprocessed must be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of

Federal law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling: Nonrefillable container. DO NOT reuse this container to hold materials other than pesticides or dilute pesticides (rinsate). After emptying and cleaning, it may be allowable to temporarily hold rinsate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state. Offer for recycling, if available.

Residue Removal: Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ 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. **Pressure rinse as follows:** Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident, call CHEMTREC AT 1-800-424-9300

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ROTAM AGROCHEMICAL COMPANY LIMITED or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ROTAM AGROCHEMICAL COMPANY LIMITED and Seller harmless for any claims relating to such factors.

ROTAM AGROCHEMICAL COMPANY LIMITED warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ROTAM AGROCHEMICAL COMPANY LIMITED, and to the extent consistent with applicable law, buyer and user assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM AGROCHEMICAL COMPANY LIMITED MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no event shall ROTAM AGROCHEMICAL COMPANY LIMITED or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED 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 ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.

ROTAM AGROCHEMICAL COMPANY LIMITED and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of ROTAM AGROCHEMICAL COMPANY LIMITED.

Rotam Imidacloprid 70WG Insecticide

For Foliar and systemic insect control on turfgrass (including sod farms), nursery, greenhouse, commercial and residential landscape ornamentals and interior plantscapes.

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 70%

OTHER INGREDIENTS 30%

Total: **100%**

EPA Reg. No. 83100-12

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN**CAUTION**

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. (If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

Manufactured by:

Rotam Agrochemical Company Ltd
7/F Cheung Tat Center
No. 18 Cheung Lee Street
Chaiwan, Hong Kong

NET CONTENTS:_____

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if inhaled. Harmful if swallowed. Causes moderate eye irritation. Avoid breathing dust. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Avoid contact with eyes or skin.

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

Engineering controls statements:

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

User Safety Recommendations

User 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.

FIRST AID

| | |
|---------------------|--|
| 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 mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice. |
| If swallowed | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| If in eyes | <ul style="list-style-type: none"> • 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. |

In case of emergency call your local poison control center for assistance. Have a product container or label with you when calling a poison control center or doctor, or going for treatment.

Note To Physician: No specific antidote is available. Treat the patient symptomatically.

ENVIRONMENTAL HAZARDS

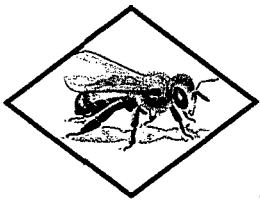
This product is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops/plants or weeds. Do not apply this product or allow it to drift to blooming crops/plants or weeds if bees are foraging 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.

Do not formulate this product into other end-use products.

PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.



Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar.

Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When Using This Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator attractive plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at:

<http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>.

Pesticide incidents (for example, bee kills) should immediately be reported to the state/tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at: www.npic.orst.edu or directly to EPA at: beekill@epa.gov

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

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

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

NON-AGRICULTURAL USE REQUIREMENTS

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

Keep children and pets off treated area until dry.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store in a tightly closed container in a cool, dry place.

Pesticide Disposal: Pesticide spray mixture or rinsate that cannot be used or chemically reprocessed must be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling: Nonrefillable container. DO NOT reuse this container to hold materials other than pesticides or dilute pesticides (rinsate). After emptying and cleaning, it may be allowable to temporarily hold rinsate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state. Offer for recycling, if available.

Residue Removal: Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ 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. **Pressure rinse as follows:** Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident, call CHEMTREC AT 1-800-424-9300