SQ 0 - 9 Please read instructions on reverse b	hefore npleting form.	10/0	5/6	2009	orm e	, ved	OMB No. 20	770-0060	Approval ev	pires 05-31-98
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United States of Agency  Environmental Protection Agency						mendme				
	Washington,		•		$\vdash$	$\dashv_{c}$	ther			
Application for Pesticide - Section I										
1. Company/Product Number		·		A Produ				3. Prop	osed Class	sification
83529-9			Venus Eagle							
4. Company/Product (Name)			PM#					X N	one	Restricted
Sharda Imidacloprid 75WP PCO Insecticide			1					restricted		
5. Name and Address of Applicant (Include Zip Code)  Sharda USA LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707  Check if this is a new address			6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(l), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name							
		Se	ction	-			·			
Amendment - Explain below Resubmission in response t Notification - Explain below.	to Agency letter dated _		-    -    X	Final p Agency "Me To	rinted lal y letter d oo" Appli · Explain	ated cation.	response to			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)  Notification of label change per PR Notice 2007-4. This notification is consistent with the provisions of PR Notice 2007-4 and EPA Regulations at 40 CFR 156.10, 154.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.										
		Sec	ction	<u>- III </u>						· · ·
1. Material This Product Will B Child-Resistant Packaging	Be Packaged In: Unit Packaging	- 17	Water So	duble Da	ckagin	<u>. I 2</u>	. Type of C	ontainer		
Yes*	Yes	•		Yes	ickagiri	9   ~		Metal		
X No	X No		X	No			$\mathbf{x}$	Plastic		
l <u>L</u>	<u> </u>	No. per 1	f "Yes"		No. per	_		Glass		
* Certification must	Jnit Packaging wgt.	container F	ontainer Package wgt container				Paper			
be submitted									ecify) HDP	E lined bags
3. Location of Net Contents Information 4. Size(s)			Retail Co	ntainer		5. L	ocation of L	abel Dire	ctions	
X Label Container 1 gall			gallon			On Lab	ղ Label			
						L	On Lab	eling acc	ompanying	product
6. Manner in Which Label is Affixed to Product  Lithograph  Apper glued Stenciled  Otheradhesive backed label										
<u> </u>		Sec	ction ·	- IV	<del></del>					
1. Contact Point (Complete item.	s directly below for it	dentification	of individ	dual to b	e conta	cted,	if necessary	, to proce	ess this app	olication.)
				Telephon (302) 234		clude Area	Code)			
I certify that the statements I have n I acknowledge that any knowingly fa both under applicable law.		ation all attachment	ts thereto	are true,			omplete.		Application red (Stamped	d)
2. Signature	3. Title				, ,	((((				
Church Wagner		Agent for Sharda USA LLC			,	( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( (	( ( ( )			
4. Typed Name		5. Date						( ( ( (		
CHERYL WAGNER	September 9, 2009				. [		`			

September 9, 2009

Wagner Regulatory Associates, Inc. P.O. Box 640 7460 Lancaster Pike, Suite 9 Hockessin, Delaware 19707

Document Processing Desk (NOTIF) ATTN: Ms. Venus Eagle, PM 1 Registration Division (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501

Dear Ms. Eagle:

Re:

Sharda Imidacloprid 75 WP PCO Insecticide

EPA Registration Number 83529-9

Notice of Revised Storage & Disposal Label Language

Wagner Regulatory Associates, Inc., on behalf of Sharda USA LLC, hereby notifies the Agency that the storage and disposal section of the subject label as been revised in accordance with PR Notice 2007-4. Enclosed for the Agency's file is:

- Letter from Sharda USA LLC authorizing Wagner Regulatory to serve as
- EPA Notification form (EPA Form 8570-1)
- One copy of revised labeling with the revised text bolded for convenience.

Please feel free to contact me at (302) 234-8551 if you have any questions or require additional information.

Respectfully submitted,

hung Waapen Cheryl Wagner

Agent for Sharda USA LLC



Sharda Imidacloprid 75 WP PCO 9Sept2009 revised Storage & Disposal Page 1 of 11

# OCT 0 5 2009 Sharda Imidacloprid 75 WP PCO Insecticide

For use by Pest Control Operators licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to using this product.

Controls and prevents infestations of termites, drywood termites, dampwood termites, carpenter ants, and other wood-infesting insects.

Active Ingredient:

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

Other Ingredients: 25.0%

Total: 100.0%

EPA Reg. No. 83529-9

EPA Est. No.

Net Contents:

Manufactured for:

Sharda USA LLC Hockessin, DE 19707

# 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.

(To the User: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

	First Aid
If Swallowed	<ul> <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> </ul>
	<ul> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> </ul>
	<ul> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	Take off contaminated clothing.
J	Rinse skin immediately with plenty of water for 15-20 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 15-20 minutes.
•	· Remove contact lenses, if present, after the first 5 minutes, then continue
	rinsing eye.
	• Call a poison control center or doctor for treatment advices
Have the product con	tainer or label with you when calling a poison control center or doctor, or
going for treatment.	676066 (11616
	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 the skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash prior to reuse. Keep children and/or pets away from treated areas until spray is dry.

NOTE: When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons and/or animals occupying the structure. People present or residing in the structure during application must be advised to remove themselves and their pets from the structure if they see any signs of leakage. After application, the Pest Control Operator and/or applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed.

## Mixers, Loaders, Applicators and Other Handlers Must Wear:

- Long-sleeved shirt and long pants
- Water-proof gloves
- Shoes plus socks
- Protective eyewear when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injection.

#### **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. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen, or in any condition where run-off or movement from the treatment area site is likely to occur.

## Storage and Disposal

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

**Pesticide Storage:** Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Do not store below freezing (32°F). Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open the container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile. Refer to the Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Dispose of the pesticide as directed below. In spill or leak incidents, keep unauthorized people away.

**Pesticide Disposal:** Wastes resulting from the use of this product must 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 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 ¼ 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. Offer for recycling or reconditioning, 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. DO NOT USE CONTAINER IN CONNECTION WITH FOOD, FEED, OR DRINKING WATER.

#### **DIRECTIONS FOR USE**

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

Important!!! Read the entire Directions for Use, Conditions of Sale and Warranty before using this product. If the terms are not acceptable, return the unopened product container immediately.

## **GENERAL PRECAUTIONS FOR APPLICATIONS**

After treatment, plug and fill all holes drilled in concrete slab areas of the building with a suitable sealant. Do not apply solution until location of heat pipes, ducts, water and sewer lines and electrical conduits are known and identified. Caution must be taken to avoid puncturing and injection into these structural elements.

Do not plant for the purposes of consumption, edible plants into the treated areas of soil.

Avoid contamination of public and private water supplies.

Use anti-backflow equipment or an air gap on filling hoses.

Consult State, Federal, or local authorities for information regarding the approved treatment practices for areas in close proximity to potable water supplies.

Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated area, or If such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.O.) for guidance. Do not formulate this product into other end-use products.

MIXING TABLE FOR SHARDA IMIDACLOPRID 75WP PCO INSECTICIDE					
GALLONS OF FINISHED SOLUTION DESIRED	FOR 0.05% CONCENTRATE	FOR 0.1% CONCENTRATE			
	Ounces of product needed	Ounces of product needed			
25	2.25	4.5			
50	4.5	9.0			
100	9.0	18.0			

**MIXING:** Refer to Mixing Table for proper amount of Sharda Imidacloprid 75 WP PCO to be used. To prepare the spray mixture, add the required amount of product into the spray tank while filling with water to the desired level. Operate the agitator while mixing.

#### **APPLICATION VOLUME**

It is recommended that application volumes described in the IMIDACLOPRID 75WP PCO INSECTICIDE "DIRECTIONS FOR USE" be used whenever possible. However, where soil conditions will not accept application of 4 gallons of IMIDACLOPRID 75WP PCO INSECTICIDE

per 10 linear feet, twice the IMIDACLOPRID 75WP PCO INSECTICIDE concentration may be applied in 2 gallons of solution per 10 linear feet. For example, If 0.05% is the correct use rate to be applied in 4 gallons of water, then 2 gallons of 0.1% dilution may be used per 10 linear feet to deliver an equivalent amount of IMIDACLOPRID 75WP PCO INSECTICIDE per unit of soil.

## **CONTROL - GENERAL**

Treatment standards for subterranean termite control may vary due to regulations, treatment procedures, soil types, construction practices and other factors. The purpose of chemical soil treatment for termite control is to establish a continuous chemical treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in the structure and the termite colonies in the soil. Follow all federal, state, and local regulations and treatment standards for protection of a structure from termites. In some instances where an aerial or above ground colony is established, supplemental treatments to control the termites, landscape modifications, and/or structural repairs may be needed to deprive termites of a moisture source. Use a 0.05% to 0.1% dilution based on local recommendations. Generally a 0.05% dilution is used for typical control situations. Where severe or persistent infestations occur, a 0.1% dilution may be used.

## PRE-CONSTRUCTION TREATMENT

Do not apply at a lower dosage and/or concentration than specified on this label for application prior to Installation of the finished grade. Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and Intended sites of application and instruct the responsible person to notify construction workers and other Individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

## **CONCRETE SLAB-ON-GROUND OR BASEMENTS**

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas under carports, porches, basement floor and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution, to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab. After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 Inches, to be deposited along the treated area. Rod holes should not extend below the footing. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 Inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat soil which will be placed In the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing. When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding of trench followed by flooding of trench and treatment of back-fill may provide a

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better opportunity to achieve a continuous chemical treated zone than using soil rodding alone to establish a vertical termiticide treated zone.

## **CRAWL SPACES**

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports In contact with the soil, plumbing, and utility services. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 Inches wide and 6 Inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed In the trench.

## **HOLLOW BLOCK FOUNDATIONS OR VOIDS**

Hollow block foundations or voids In masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide In locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the dean up is completed.

## POST-CONSTRUCTION TREATMENT

## **CONCRETE SLAB-ON-GROUND**

To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures. It may be necessary to drill through the slab or exterior foundation. Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet per foot of depth to provide a uniform treated Zone. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED, USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material. An application should be made by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the out-side foundation should be about 6 inches wide and 6 Inches deep. Use a low pressure spray to treat soil as it is being placed in the trench. Rodding can be done from the bottom of a shallow trench. When rod-ding, rod holes should be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 Inches, to be deposited along the treated area. Rod hole depth should not extend below the footing.

#### **BATH TRAPS**

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Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas should be treated with 3 gallons of solution per square foot. An access door or inspection vent should be cut and installed, if not already present. After Inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

#### **CRAWL SPACES**

When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to Pre-Construction Treatment). If unable to excavate, crawl space soil and wood treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform chemical treated zone. Use a very coarse spray at a pressure not exceeding 25 PSI at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil, wood and structural members contacting the soil at the above rates. Do not apply to inaccessible crawl space areas using pressures greater than 25 PSI at the treatment tool when the valve is open. Treatment may also be made by drilling through the foundation wall or through the floor above and treating the soil perimeter at a rate of 1 gallon of solution per 10 square feet Drill spacing must be at Intervals not to exceed 16 Inches. Many states have smaller Intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform chemical treated zone.

#### **SHALLOW FOUNDATIONS**

For shallow foundations, one foot or less in depth, dig a narrow trench approximately 6 inches wide and deep along the outside and inside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to the top of footer to provide a uniform treated zone. The dilution should be applied to the trench and mixed with the soil as it is placed in the trench.

## **BASEMENTS - OUTSIDE PERIMETER**

Along the outside of the exterior walls, an application must be made by trenching or rodding within the trench. Rodding depth should be to the top of the footer, or to a minimum of 4 feet or according to state or local regulations. When rodding through a trench, dig a narrow trench about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone by rodding through the trench. Use a low pressure spray to treat soil which will be placed into the trench after rodding. Mix spray solution with the soil as it is being placed in the trench.

#### **BASEMENTS - INSIDE PERIMETER**

If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around sewer pipes, floor drains, conduits, expansion joints or any cracks or holes In the basement floor. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to provide a uniform treated zone.

Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

#### HOLLOW BLOCK FOUNDATION OR VOIDS

Sharda Imidacloprid 75 WP PCO 9Sept2009 revised Storage & Disposal Page 7 of 11

Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone In the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a pre-caution against application leakage In the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termticide In locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

## **PLENUMS**

For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution {see APPLICATION VOLUME) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing and conduits. The soil should be treated by trenching to a depth of 6 Inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 Inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 PSI when measured at the treating tool when valve is on).

When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

## TREATMENT AROUND WELLS OR CISTERNS

Do not contaminate wells or cisterns. Structures With Wells/Cisterns Inside Foundations: Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

 Do not treat apply within 5 feet of any well or cistern by rodding and/or trenching or by the backfill method. Treat soil between 5 and 10 feet from the well or cistern by the backfill method only. Treatment of soil adjacent to water pipes within 3 feet of grade should only be done by the backfill method.

The treated backfill technique is described as follows:

- Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
- Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
- After the treated soil has absorbed the solution, replace the soil into the trench.
- 2. Treat infested and/or damaged wood in place using an injection technique such as described in the (Control of Wood Infesting Pests-section of this label.

Structures With Adjacent Wells / Cisterns and/or Other Water Bodies: Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other

bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

- 1. Prior to treatment, if feasible, expose the water pipe(s) coming from the well to the structure, if the pipe(s) enter the structure within 3 feet of grade.
- 2. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain, Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
- 3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

## **FOAM APPLICATIONS**

Construction practices, soil subsidence and other factors may create situations in which a continuous chemical treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices, to pro-vide a continuous treated zone.

Foam application may be made alone or In combination with conventional application methods, provided that the labeled amount of active Ingredient per unit area is used.

## Foam Application Use Directions

Mix solution of Sharda Imidacloprid 75 WP PCO with manufacturer's recommended volume of foaming agent (see table for foaming recommendations). Apply a sufficient volume of Sharda Imidacloprid 75 WP PCO foam alone or in combination with liquid solution to provide a continuous treated zone at the recommended rate for specific application sites. Use appropriate dispersion tips and application method for site. Foam and liquid applications must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of Sharda Imidacloprid 75 WP PCO must be applied as a typical liquid treatment. The remaining 25% or less gallons are delivered to appropriate locations using a foam application.

Mixing Table for Sharda Imidacloprid 75 WP PCO FOAM						
Ounces of product	Gallons of Water	Foam Expansion Ratio	Finished Foam			
			(gallons)	(ai%)		
2.25	1	25:1				
	2.5	10:1	25			
	5	5:1	1	0.05		
4.5	1	50:1	· ·	0.05		
	2.5	20:1	50			
	5	10:1	1			

Add the manufacturer's recommended quantity of foam agent to the Sharda Imidacloprid 75 WP PCO solution.

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, wall voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

## **CONTROL OF WOOD INFESTING PESTS**

For control of above ground termites and carpenter ants in localized areas, apply a 0.05 to 0.1% solution or sufficient volume of Sharda Imidacloprid 75 WP PCO foam to voids and galleries in damaged wood, and in spaces between wooden structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to Inaccessible areas by drilling, and then injecting the suspension or foam with a suitable directional Injector Into the damaged wood or wall voids. Termite carton nests in building voids may be injected with a 0.05 to 0.1% suspension or foam. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such nests are found\* Application to attics, crawl spaces, unfinished basements, or man-made voids may be made with a coarse fan spray of 0.05 to 0.1 % solution or foam to control exposed worker and winged reproductive forms of termites or carpenter ants. This type of application is intended to be a supplemental treatment for control of above ground subterranean termites and carpenter ants.

Use a 0.05% to 0.1% solution to control existing Infestations of or to prevent Infestation by termites or carpenter ants in trees, utility poles, fencing and decking materials, landscape timbers and similar non-structural wood-to-soil contacts. If possible, locate the interior infested cavity and inject a 0.05 to 0.1% solution or sufficient volume of Sharda Imidacloprid 75 WP PCO foam using an appropriate treatment tool with a splashback guard. These non-structural wood-to-soil contacts may also be treated by applying a solution to the soil as a spot application or continuous treated zone applied as a drench or by rodding around the base of the point(s) of soil contacts). Rod holes should be placed approximately 3 Inches away from the soil contact point(s) and spaced no more than 12 inches along the perimeter of the soli contacts). For small poles or posts (< 6 Inches In diameter), apply 1 gallon per foot of depth. For larger constructions, apply 4 gallons per 10 linear feet per foot of depth. Retreat as needed to maintain protection.

Termite carton nests in trees may be injected with a 0.05 to 0.1% solution or sufficient volume of foam using a pointed injection tool. Multiple injection points to varying depths may be necessary. Removal of carton material from trees is desirable but may not be necessary when foam application is used. In some instances, a perimeter application of a 0.05% to 0.1% solution applied to soil around the root flare of the tree may be necessary to prevent reinfestation by termites In the soil. For small trees (< 6 inches in diameter), apply 1 gallon of solution. For larger trees, apply 4 gallons per 10 linear feet (measured as the circumference at the root flare).

For protection of firewood or other wood products stored In contact with soil from carpenter ants and termites, treat soil prior to stacking with a 0.05 to 0.1% solution at 1 gallon per 10 square feet to prevent infestation. Curative application to the soil around firewood or other wood products stored In contact with soil may be made as described for non-structural wood-to-soil contacts (above),

Drywood termites and wood-Infesting beetles or borers (such as, but not limited to, powder post beetles, anobiid or deathwateh beetles, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles). Galleries and structure voids can be treated with sprays, mists, or foams of a 0.05% to 0,1% Sharda Imidacloprid 75 WP PCO solution. Locate galleries by using visual signs (frass or pellets/ blistered wood, emergence or clean out holes), the presence of live insects, mechanical sounding techniques, or listening devices (e.g., stethoscopes, acoustic emission detectors). Penetrate the gallery system by drilling holes to receive the injector tip or treatment tool. Distribute drill holes to adequately cover the gallery system. [NOTE: Avoid drilling where electrical wiring, plumbing lines, etc. are located.] Apply Sharda Imidacloprid 75 WP PCO solutions as a low pressure (about 20 psi) spray or by misting or, where appropriate, by foaming. It is not necessary to treat to the point where runoff Is detected from adjacent holes. [NOTE: Do not apply where electrical shock hazards exist.] Drill holes should be sealed after treatment Also, wood surfaces can be sprayed or misted with a 0.05% to 0.1% solution or, where appropriate, use a sufficient volume of foam. For inaccessible surfaces, drill and treat the interior of structural voids. Surfaces treated may include exposed wooden surfaces in crawl-spaces, basements, or attics, wooden exterior surfaces such as decks, fencing, or siding, structural voids,

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channels in damaged wood, In spaces between wooden members of a structure, and junctions between wood and foundations. Apply by brushing or as a coarse, low pressure (about 20 psi) spray to the wood surface; apply sufficient volume to cover the surface to the point of wetness, but avoid applying to the point of runoff. When spraying overhead in living areas, cover surfaces below the treated area with plastic sheeting or similar material. Avoid contact with treated surfaces until spray deposits have dried. Retreat as needed to maintain protection.

**Localized Treatment for Carpenter Bees**: Apply a 0.05% to 0.1% solution as a spray or mist, or sufficient volume of foam, directly Into gallery entrance holes. Following treatment, entrance holes may be plugged with small pieces of steel wool or similar material.

## RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide treated zone in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the treated zone. Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgment of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment, the applicator should consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

## PERIMETER PEST CONTROL

#### **Carpenter Ants**

For control of carpenter ants in houses and other structures, apply a 0.05 to 0.1% solution as a general surface, spot, crack and crevice or wall void application. Apply around doors and windows, eaves and attic vents, and other places where carpenter ants enter the structure, or where they crawl or hide. Spray Into cracks and crevices, and spray, mist or foam through small drilled holes into voids where these ants or their nests are present. Apply the volume of spray, mist or foam sufficient to cover the area. Repeat treatments when necessary to maintain control.

For control of carpenter ants tunneling in soil, apply a 0.05 to 0.1% solution as a drench or inject the solution, or sufficient volume of foam, at intervals to establish a continuous treated zone. Establish a uniform treated zone at the edge of walls/driveways or other hard surfaces where ants are tunneling beneath the surfaces.

When the nest site(s) can be located, treat the interior cavity and/or nest site by injecting a 0.05% to 0.1 % solution as a spray or mist, or sufficient volume of foam, using an appropriate treatment tool with a splashback guard.

## CONDITIONS OF SALE AND WARRANTY

The DIRECTIONS FOR USE of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury,

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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 Sharda USA LLC, its Supplemental Distributors, or the Seller, All such risks shall be assumed by the Buyer. Sharda USA LLC, its Supplemental Distributors and the Seller warrant that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. NEITHER SHARDA USA LLC, NOR ITS SUPPLEMENTAL DISTRIBUTORS MAKE ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR ANY PARTICULAR PURPOSE OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS. BUYER'S EXCLUSIVE REMEDY AND THE EXCLUSIVE LIABILITY OF SHARDA USA LLC., ITS SUPPLEMENTAL DISTRIBUTORS AND THE SELLER FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. When Buyer suffers losses or damages resulting from the use or handling of this product (including claims based on contract. negligence, strict liability, or other legal theories), Buyer must promptly notify Seller in writing of any claims to be eligible to receive either remedy stated above. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL SHARDA USA LLC, ITS SUPPLEMENTAL DISTRIBUTORS, OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. SHARDA USA INC. its Supplemental Distributors, and the Seller offer this product, and the Buyer accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of SHARDA USA LLC. No employee or agent of SHARDA USA LLC its Supplemental Distributor, or the Seller is authorized to vary or exceed the terms of this Warranty in any other manner.