



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 6, 2015

Amtide LLC
c/o
Ann M. Tillman
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: PRIA Label and CSF Amendment – Add 2 new alternate CSFs and revise the Storage and Disposal text
Product Name: Technical Imidacloprid
EPA Registration Number: 83851-5
Application Date: October 21, 2014
Decision Number: 496570

Dear Ms. Tillman:

The amended label and CSF(s) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSF(s):

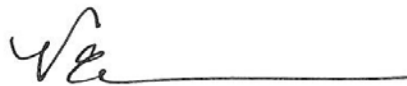
- Basic CSF dated 09/06/07
- Alternate CSF 1 dated 05/17/13
- Alternate CSF 2 dated 08/25/14
- Alternate CSF 3 dated 08/25/14

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40

CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Gene Benbow by phone at 703-347-0235 or via email at Benbow.Gene@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'VE', followed by a horizontal line.

Venus Eagle, Product Manager 01
Invertebrate and Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Technical Imidacloprid

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

Imidacloprid,

1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine99.0%

OTHER INGREDIENTS:1.0%**TOTAL:**100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

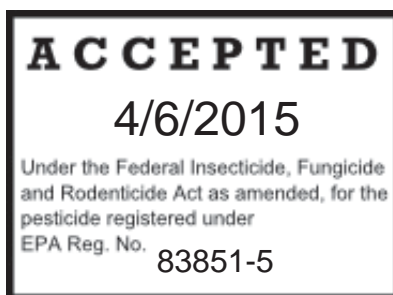
FIRST AID	
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Chemtrec at 1-800-424-9300 for emergency medical treatment information.	

EPA Reg. No. 83851-5**EPA Est. No.****Manufactured for:**

AmTide LLC

21 Hubble

Irvine, CA 92618

Net Weight:

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes and 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.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is to be used only for formulation into registered insecticide products and is not for resale under this label.

Instructions to Formulators: This technical product may be used to manufacture insecticide end-use products for:

- 1) Terrestrial Non-Food Crop, Residential, and Commercial Outdoor (including Greenhouses): lawn, turf and ornamentals (trees, shrubs, evergreens, flowers, foliage plants, groundcovers) in and around residential or commercial buildings; Christmas trees; Poplar/Cottonwood trees.
- 2) Residential and Commercial Indoor Non-Food: Greenhouse ornamentals; interior plantscapes
- 3) Indoor Non-food Use: Technical Imidacloprid can be formulated into end-use aqueous and solvent system products for pressure treatment of wood products [millwork (window frames, wood doors, doorframes, etc.), in-ground contact uses (wood products - pilings, telephone poles, wood building materials, etc.); sapstain control (fresh-cut lumber)] to protect against termites.
- 4) Terrestrial Food Crops, including:

Artichoke (Globe)	Herb Crop Subgroup 19A
Banana & Plantain	Hops
Bushberry Crop Subgroup	Leafy Petiole Vegetables Crop Subgroup
<i>Brassica</i> (Cole) Crop Group	Leafy Vegetables Crop Subgroup
Bulb Vegetables Crop Group	Legume Vegetables Crop Group, except soybean
Caneberry	Peanuts
Canola	Pome Fruit Crop Group
Cereal Grain Crop Group (barley, oat, rye, sorghum, wheat), excluding rice	Pomegranate
Citrus Crop Group (containerized and field)	Potato (including seed piece treatment)
Coffee	Root and Tuber Vegetables Crop Subgroup, except sugar beet
Cotton	Soybean
Cranberry	Strawberry
Cucurbit Crop Group	Stone Fruit Crop Group
Fruiting Vegetable Crop Group	Sugar Beet
Grapes	Tobacco
Greenhouse Vegetables (tomato, cucumber)	Tree Nut Crop Group, excluding Almonds
	Tropical Fruit (Acerola, Atemoya, Avocado, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Jaboticaba, Guava, Llama, Longan, Lychee, Mamey

sapote, Mango, Papaya, Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu)

- 5) Uses for which U. S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration;
- 6) Uses for experimental purposes that are in compliance with U.S. EPA requirements

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

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

CONTAINER HANDLING:

Lined Drums: Liner: Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill. **Outer Drum:** Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of drum in a sanitary landfill.

Bags: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into formulation equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or by other procedures approved by state and local authorities.

CONDITION 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. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of AmTide LLC 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 AmTide LLC and Seller harmless for any claims relating to such factors.

AmTide LLC 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 this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or AmTide LLC, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, AMTIDE LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither AmTide LLC or Seller shall 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 AMTIDE LLC 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 AMTIDE LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

AmTide LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of AmTide LLC.

[Label Code No.]

[Approval date]