

87290-26

03/19/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001



OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 19, 2013

Willowood, LLC  
c/o Ms. Cheryl Wagner  
Wagner Regulatory Associates, Inc.  
P.O. Box 640  
Hockessin, DE 19707

Subject: Alternate Brand Name Notification per Pesticide Registration Notice 98-10

Dear Ms. Wagner,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10, dated February 21, 2013, for "Willowood Imidacloprid 4SC," EPA Registration Number 87290-26.

The Registration Division (RD) has conducted a review of your application for applicability under PRN 98-10, and finds that the action requested is acceptable. Therefore, the following alternate brand name has been added to the product record:

- Willowood Imidacloprid 4ST

Please contact me at (703) 308-8735 or [chao.julie@epa.gov](mailto:chao.julie@epa.gov) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie A. Chao".

Julie A. Chao  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
Office of Pesticide Programs



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other  
 OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 87290-26	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Willowood LLC / Willowood Imidacloprid 4SC ABN Willowood Imidacloprid 4ST	PM# 1	
5. Name and Address of Applicant (Include Zip Code) Willowood LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. <b>NOTIFICATION</b> Product Name: <b>MAR 19 2013</b>	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification -	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)  
 Notification of alternate brand name per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and 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.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" No. per Unit Packaging wgt. container	If "Yes" No. per Package wgt. container		<input checked="" type="checkbox"/> Plastic	
* Certification must be submitted				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) HDPE lined bags	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 gallon		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____ adhesive backed label _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Cheryl Wagner		Title Agent for Willowood LLC		Telephone No. (Include Area Code) (302) 635-7289	
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received  (Stamped)	
2. Signature 		3. Title Agent for Willowood LLC			
4. Typed Name Cheryl Wagner		5. Date February 21, 2013			

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Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7217 Lancaster Pike, Suite A  
Hockessin, Delaware 19707

February 21, 2013

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

**NOTIFICATION**

**MAR 19 2013**

Dear Ms. Eagle,

**Subject: Willowood Imidacloprid 4SC**  
**EPA Registration Number 87290-26**  
**Notification of ABN: Willowood Imidacloprid 4ST for Seed Treatment Uses**

Wagner Regulatory Associates, Inc., as agent for Willowood USA, LLC, hereby notifies the Agency of alternate brand name Willowood Imidacloprid 4ST for seed treatment uses. Enclosed are:

- EPA Notification form (8570-1)
- Agent letter
- 1 copy of the final print market label

If you have any questions about this submission please contact the undersigned at [Cheryl@wagnerreg.com](mailto:Cheryl@wagnerreg.com) or (302) 635-7289.

Respectfully submitted,

Cheryl Wagner  
Agent for Willowood, LLC

Enclosures

**WL Willowood**  
**IMIDACLOPRID 4ST**

**For use as a seed treatment to protect the seed of listed crops against listed pests**

<b>ACTIVE INGREDIENT</b>	<b>% BY WT.</b>
Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	40.7%
<b>OTHER INGREDIENTS:</b>	59.3%
<b>TOTAL:</b>	100.0%

Contains 4.0 lbs. of active ingredient per gallon.

**STOP-Read the label before use.**  
**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

See inside booklet for additional Precautionary Statements, Directions for Use, and Limitation of Warranty and Liability

EPA Reg. No. 87290-26

EPA Est. No. 086555-MO-001

**Manufactured For:**  
 Willowood, LLC  
 1600 NW Garden Valley Blvd #120  
 Roseburg, OR 97471

**SHAKE WELL BEFORE USING**

**NET CONTENTS: 1 Gallon**

**NOTIFICATION**

**MAR 19 2013**

**FIRST AID**

<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at **1-800-858-7378** seven days a week, 6:30 a.m. to 4:30 p.m. Pacific Time (NPIC website: [www.npic.orst.edu](http://www.npic.orst.edu)).

**NOTE TO PHYSICIAN:** No specific antidote is available. Treat the patient symptomatically.

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

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical resistant to this product are listed below. More options can be obtained by following the instructions for Category C on an EPA chemical-resistance category selection chart.

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such as nitrile rubber, butyl rubber, neoprene rubber, barrier laminate, polyethylene, polyvinyl chloride (PVC), or Viton.
- Shoes plus socks

**User Safety Requirements**

Follow manufacturer's instructions for cleaning/maintaining personal protective equipment, PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

### ENGINEERING CONTROLS STATEMENT

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

**Users should:**

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

### ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and highly toxic to aquatic invertebrates. Do not apply directly to water, 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. Cover or incorporate spilled treated seeds.

This product is highly toxic to bees. Ensure that planting equipment is functioning properly in accordance with manufacturer specifications to minimize seed coat abrasion during planting to reduce dust which can drift to blooming crops or weeds.

**Ground Water Advisory**

This chemical demonstrates the properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination.

## DIRECTIONS FOR USE

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

For use in commercial seed treatment facilities. Use is also permitted as an end-use seed treatment on agricultural establishments at planting, or immediately before planting, as specified in the Specific Crop Use Directions. This product is to be used in liquid or slurry treaters only.

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.

Mix thoroughly before use or use entire container at one time. All tank mixes should be pre tested to determine physical compatibility between formulations. Follow the most restrictive precautions and limitations on the labeling of all products used in mixtures.

### AGRICULTURAL USE REQUIREMENTS

Use this product 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 intervals. 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 seed is treated with the product and the treated seed is soil-injected or soil-incorporated, 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, polyethylene, polyvinyl choride (PVC), or Viton
- Shoes plus socks

### ROTATIONAL CROPS

Treated areas may be replanted with any crop specified on an imidacloprid label, or any crop for which a tolerance exists for the active ingredient, as soon as practical following the last application. The following plant-back intervals are required for listed crops:

Rotational Plant-Back Intervals*				
Immediate Plant-back				30-Day Plant-back
Artichoke	Crambe	Oats	Soybean	Cereals, including: Buckwheat Rice
Barley	Cucurbits	Okra	Strawberry	
Brassica (cole)	Eggplant	Pepinos	Sugarbeet	
Leafy vegetable.	Flax	Pepper	Sunflower	
Borage	Ground cherry	Popcorn	Tomatillo	
Bulb vegetable	Leaf petiole veg.	Potato	Tomato	
Canola	Leafy veg.	Rapeseed	Triticale	
Cilantro	Legume veg.	Rye	Root and Tuber	
Corn, Field	(succulent or	Safflower	Veg.	
Corn, Sweet	dried, including	Sorghum	Watercress	
Cotton	soybean)		Wheat	
Cranberry	Millet			
	Mustard seed			

\*Cover crops for soil building or erosion control may be planted any time, but do not graze or harvest for food or feed. For all other crops not listed on an Imidacloprid label, or for crops for which no tolerances for the active ingredient has been established, a 12-month plant-back interval is required.

**Notification** of the crop rotational restriction must be conveyed to the grower by appropriate seed tag labeling or bag printing on all seed units.

**NOTE:** The purchaser of this product is responsible for ensuring that all seed treated with this product are adequately dyed with a suitable color to prevent its accidental use as food for man or feed for animals. Refer to 21 CFR, Part 2.25. Any dye or colorant added to treated seed must be cleared for use under 40 CFR, Part 180.1001. Federal regulations have established official tolerances for certain pesticide residues. In order that residues on food and forage crops will not exceed established tolerances, use only at specified rates.

Treated seed must not be used for or mixed with food or animal feed or processed for oil. Seed commercially treated with Willowood Imidacloprid 4ST must be labeled in accordance with all applicable requirements of the Federal Seed Act.



**Use Restrictions**

- DO NOT use as a planter (hopper) box treatment.
- DO NOT use treated seed for feed, food, or oil purposes.
- Store treated seed away from feeds and foodstuffs.
- DO NOT allow children, pets or livestock to have access to treated seed.
- The maximum application rate for imidacloprid (including seed treatments foliar applications soil applications) is 0.5 lbs. per acre per year.
- DO NOT apply more than 0.5 lbs. AI imidacloprid per acre per year.
- Treated seed must be planted into the soil at a depth greater than 1 inch.
- Exposed treated seed may be hazardous to birds. Cover or incorporate spilled treated seed. Excess or leftover seed may be double sown around the headland or buried away from bodies of water in accordance with local requirements.

**SEED BAG LABELING REQUIREMENTS**

Seed commercially treated with this product must be labeled in accordance with all applicable requirements of the Federal Seed Act. The user of this product is responsible for ensuring that the seed bag meets all requirements under the Federal Seed Act.

**THE FEDERAL SEED ACT REQUIRES THAT BAGS CONTAINING TREATED SEEDS BE LABELED WITH THE FOLLOWING STATEMENTS:**

This seed has been treated with Willowood Imidacloprid 4ST (imidacloprid).  
DO NOT use treated seed for feed, food, or oil purposes.

**THE US ENVIRONMENTAL PROTECTION AGENCY REQUIRES THE FOLLOWING STATEMENTS ON BAGS CONTAINING SEEDS TREATED WITH WILLOWOOD IMIDACLOPRID 4ST (imidacloprid)**

- Pollinator Precautions: Imidacloprid is highly toxic to bees. Ensure that planting equipment is functioning properly in accordance with manufacturer specifications to minimize seed coat abrasion during planting to reduce dust which can drift to blooming crops or weeds.
  - Store away from feeds and foodstuffs.
  - Wear long sleeved shirt, long pants, and chemical resistant gloves when handling treated seed.
  - Treated seed must be planted into the soil at a depth greater than 1 inch.
  - Exposed treated seed may be hazardous to birds. Cover or incorporate spilled treated seeds. Excess or leftover seed may be double sown around the headland or buried away from bodies of water in accordance with local requirements.
  - Dispose of seed packaging in accordance with local requirements.
  - DO NOT contaminate water bodies when disposing of planting equipment washwater.
  - DO NOT allow children pets or livestock to have access to treated seed.
- In the event of a crop failure or harvest of a crop grown from Willowood Imidacloprid 4ST treated seed, the field may be replanted immediately to artichoke, barley, borage, Brassica (cole) leafy vegetables, bulb vegetables, canola, cilantro, corn (field or sweet), cotton, cranberry, crambe, cucurbits, eggplant,

flax, groundcherry, leafy petiole vegetables, leafy vegetables, legume vegetables (succulent or dried including soybean), millet, mustard seed, oats, okra, pepinos, pepper, popcorn, potato, rapeseed, rye, safflower, sorghum, soybean, strawberry, sugarbeets, sunflower, tomatillo, tomato, triticale, root and tuber vegetables, watercress, and wheat. For cereals, including buckwheat and rice, the minimum plant back interval is 30 days from the date Willowood Imidacloprid 4ST treated seed was planted. Cover crops for soil building or erosion control may be planted at any time but do not graze or harvest for food or feed. For all other crops not listed on an imidacloprid label, or for crops for which no imidacloprid tolerance for the active ingredient has been established, a 12 month plant back interval must be observed.

- The maximum application rate (including seed treatment foliar application and soil application) per acre per year for imidacloprid is 0.5 lbs.
- This seed has been treated with   X   lbs. imidacloprid per lbs. of seed [ or   X   mg imidacloprid per seed].
- Excess treated seed may be used for ethanol production only if (1) by products are not used for livestock feed and (2) no measurable residues of pesticides remain in the ethanol by products that are used in agronomic practice.

**SPECIFIC CROP USE DIRECTIONS**

<b>CARROT</b>	
To provide early season protection of seedlings against injury by listed pests apply as a commercial seed treatment	
<b>For Use In Commercial Seed Treatment Facilities</b>	
<b>Target Pest</b>	<b>Fl. oz. product/100 lbs. seed</b>
Seed corn maggot Wireworm	8.0

**CORN**

For the protection of corn plants from the corn insect pests listed below apply as a seed treatment at the specified rates

**Field Corn**

**For Use In Commercial Seed Treatment Facilities**

Target Pests	Fl. oz. of product/			Mg A.I./ SEED
	100 lbs. seed	1,000 seeds	80,000 seed count	
Corn root worm (including Northern, Western, Southern, and Mexican) <sup>1</sup> Flea beetle Chinch bug Southern green stinkbug White grub Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Southern corn leaf beetle Billbug <sup>2</sup> Grape colaspis <sup>2</sup> Black cutworm <sup>3</sup>	16.9	0.095	7.57	1.34

This product contains 14,200 mg imidacloprid (AI/fluid ounce based on a standard number of 1,786 seeds/lb. (100,000 seeds/56 lb. bag).

<sup>1</sup> In areas of heavy to severe corn rootworm populations protection will not be adequate. Use only in areas of light to moderate corn rootworm populations. Consult your State Agricultural Extension Service on levels of corn rootworm populations.

<sup>2</sup> Reduces early season feeding damage.

<sup>3</sup> Will reduce feeding damage caused by leaf feeding black cutworms that are 1/2 inch or less in length.

<b>Field Corn</b>				
<b>For Use In Commercial Seed Treatment Facilities</b>				
<b>Target Pests</b>	<b>Fl. oz. of product/</b>			<b>Mg A.I./ SEED</b>
	<b>100 lbs. seed</b>	<b>1,000 seeds</b>	<b>80,000 seed count</b>	
Flea beetle Chinch bug Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Grape colaspis <sup>2</sup> White grub	7.6	0.043	3.40	0.60
Seed corn maggot (seed protection only) Wireworm (seed protection only) Flea beetle (through 1 leaf stage) Imported fire ant White grub <sup>4</sup>	2.0	0.011	0.90	0.16
<p>This product contains 14,200 mg. imidacloprid (AI) /fluid ounce based on a standard number of 1,786 seeds/lb. (100,000 seeds/56 lb. bag)</p> <p><sup>2</sup> Reduces early season feeding damage.</p> <p><sup>4</sup> Reduces feeding damage during emergence and seedling stages.</p> <p><b>NOTE:</b> To maintain mg. AI/seed, adjust fluid ounces/100 lb. in proportion to the actual seeds/lb. compared to the standard number of seeds/lb. for that crop. Fluid ounces per number of seeds does not need to be adjusted. For example, if there are 1,600 corn seeds/lb. and the targeted rate is 0.16 mg. AI/seed at a non-adjusted rate of 2.0 fl. oz./100 lb. of seed use <math>(1,600 - 1,786) \times 2.0 = 1.79</math> fl. oz./100 lb. of seed.</p>				
<b>For End Use Application At Agricultural Establishments</b>				
<p>Apply using an HCBT or an Eight Bag Batch Treater. Shake this product thoroughly before use. Dilute this product with water and/or an approved Willowood fungicide mixture. Adjust the final slurry rate to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50 pound bag of seed. Treat one half of slurry mix. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50 pound bag of seed following the product application and allow it to distribute evenly on the seed.</p>				

<b>Sweet Corn</b>	
<b>For Use In Commercial Seed Treatment Facilities</b>	
<b>Target Pests</b>	<b>Fl. oz. product/100 lbs. seed</b>
Flea beetle Early season corn leaf aphid Seed corn maggot Wireworm	8.0
Imported fire ant Early season corn leaf aphid Seed corn maggot Wireworm	4.0 - 8.0
Imported fire ant Seed corn maggot (seed protection) Wireworm (seed protection)	2.0 - 4.0
Wireworm (seed protection)	1.0 - 2.0
Adjust the final slurry rate to apply 16 to 20 fluid ounces of diluted solution per 100 lbs. of seed with commercial equipment.	

<b>Popcorn</b>	
<b>For Use In Commercial Seed Treatment Facilities</b>	
<b>Target Pests</b>	<b>Fl. oz. product/100 lbs. seed</b>
Flea beetles	8.0

<b>COTTON (Delinted Seed Only)</b>		
To provide protection of seedlings against injury by listed pests, apply as a seed treatment at the specified rates.		
<b>For Use In Commercial Seed Treatment Facilities</b>		
<b>Target Pests</b>	<b>Fl. oz. product/100 lbs. seed</b>	<b>MG AI/SEED</b>
Thrips, Aphids	16.0	0.375
<b>For End Use Application At Agricultural Establishments</b>		
Apply using an HCBT or an 8 Bag Batch Treater. Shake this product thoroughly before use. This product may be diluted with water or an approved Willowood fungicide mixture for extended disease protection. Adjust the final slurry rate to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50 pound bag of seed. Treat one half of seed with one half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.		
<b>Target Pests</b>	<b>Fl. oz. product/50 lbs. bag</b>	
Thrips, Aphids	8.0	
<b>USE RESTRICTIONS</b>		
Regardless of the type of application (seed treatment soil or foliar), DO NOT apply more than a total of 0.5 pound of imidacloprid per acre per year.		

<b>OIL SEED CROP GROUP</b>	
To provide early season protection of seedlings against injury by listed pests apply as a seed treatment at the rates specified.	
<b>For Use In Commercial Seed Treatment Facilities</b>	
Target Pests	Fl. oz. product/100 lbs. seed
Aphids, Flea beetles, Wireworms	12.8 – 32.0
In areas where flea beetles and foliar insects are in high numbers, use the higher application rate within the specified range. Consult your local agricultural office for pest patterns history and forecasts to assist in determining the appropriate rate for your region.	
For suppression of 2 <sup>nd</sup> Generation <i>Lygus</i> bugs including <i>Lygus</i> spp. Seedpod weevil larvae including <i>Ceutorhynchus assimilis</i>	19.2 – 32.0
<b>Flax, Crambe, and Borage</b>	
Target Pests	Fl. oz. product/100 lbs. seed
Wireworms Seed corn maggots Flea beetles	32.0
<b>Safflower</b>	
Target Pests	Mg. AI/Seed
Wireworms	0.25 – 0.50 (14,200 mg imidacloprid/fl. oz. product)
<b>Sunflower</b>	
Target Pests	Mg. AI/Seed
Wireworms Seed corn maggots Flea beetles	0.25 – 0.50 (14,200 mg. imidacloprid/fl. oz. product)

<b>OIL SEED CROP GROUP (cont'd.)</b>	
<b>For End Use Application At Agricultural Establishments</b>	
Apply using an HCBT or a Batch Treater. Shake this product thoroughly before use. This product may be diluted with an approved Willowood fungicide mixture for extended disease protection. Treat one half of seed with one half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.	
<b>Canola, Rapeseed, Mustard Seed</b>	
Target Pests	Fl. oz. product/50 lbs. bag
Aphids Flea beetles Wireworms	6.4 - 16.0
<b>Flax, Sunflower, Crambe, and Borage</b>	
Target Pests	Fl. oz. product/100 lbs. bag
Wireworms Seed corn maggots Flea beetles	16.0
<b>Safflower</b>	
Target Pests	Fl. oz. product/100 lbs. bag
Wireworms	16.0
<b>USE RESTRICTIONS</b>	
Rape greens grown and harvested from this products treated seed must not be used for human and feed consumption. Rapeseed grown and harvested from this products treated seed is only for industrial uses and cannot be used for edible oil or any other human/feed consumption. Seed treated in California must be destined for planting in states other than California and is not to be planted in California.	



**SEED AND POD VEGETABLES (including)**

Adzuki Bean, Asparagus Bean, Broad Bean (Succulent or Dry), Catjang Bean, Chinese Longbean, Field Bean, Guar Bean, Jackbean, Kidney Bean, Lablab Bean, Lima Bean (Succulent or Dry), Moth Bean (Succulent or Dry), Mung Bean, Navy Bean, Pinto Bean, Rice Bean, Runner Bean, Snap Bean, Sword Bean, Tepary Bean, Urd Bean, Wax Bean, Yardlong Bean, Blackeyed Pea (Succulent or Dry), Chickpea, Cowpea (Succulent or Dry), Crowder Pea, Dwarf Pea, Edible Pod Pea, English Pea, Field Pea, Garden Pea, Green Pea, Pigeon Pea (Succulent or Dry), Snow Pea, Southern Pea (Succulent or Dry), Sugar Snap, Pea Gram, Lupin, Sweet Lupin, White Lupin, White Sweet Lupin, Lentil

To provide early season protection of seedlings against injury by listed pests apply as a seed treatment at the specified rates.

**For Use In Commercial Seed Treatment Facilities**

Target Pests	Fl. oz. product/100 lbs. bag
Wireworm, Bean Leaf Beetle, Fire ant, Aphids	2.0 - 4.0

**USE RESTRICTIONS:**

Seed-and-pod vegetable seed treated in California must be destined for planting in states other than California and is not to be planted in California.

<b>SORGHUM</b>	
To provide early season protection of seedlings against injury by listed pests, apply as a seed treatment at the specified rates.	
<b>For Use In Commercial Seed Treatment Facilities</b>	
Target Pests	Fl. oz. product/100 lbs. bag
Aphids (including Corn leaf, English grain, Greenbug, and Yellow sugar cane) Chinch bugs Fire ants Wireworms	8.0
<b>For End Use Application At Agricultural Establishments</b>	
Apply using an HCBT or an 8-Bag Batch Treater. Shake this product thoroughly before use. Dilute this product with water. Adjust the final slurry rate to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50-pound bag of seed following the product application and allow it to distribute evenly on the seed.	
Target Pests	Fl. oz. product/50 lbs. bag
Aphids (including Corn leaf, English grain, Greenbug, and Yellow sugar cane) Chinch bugs Fire ants Wireworms	4.0
<b>USE RESTRICTIONS:</b> DO NOT graze or feed livestock on treated areas for 45 days after planting.	

**SOYBEAN**

To provide early season protection against injury by listed pests and to suppress the spread of certain viruses caused by insect vectors, apply as a seed treatment at the specified rates.

**For Use In Commercial Seed Treatment Facilities**

Use higher rates within the specified range to provide increased length of protection and for heavy insect pressure. This product can be used as an over-treatment.

Target Pests	Fl. oz. of product/			Mg. A.I./ SEED
	100 lbs. seed*	1,000 seeds	140,000 seed count	
Seed corn maggot Soybean aphids Bean leaf beetles (overwintering)	2.0 - 4.0	0.0067 - 0.0133	0.93 - 1.87	0.095 - 0.190

This product contains 14,200 mg. imidacloprid /fluid ounce.

\*based on a standard number of 3,000 seeds/lb.

**NOTE:** To maintain mg. AI/seed, adjust fluid ounces/100 lbs. of seed in proportion to the actual seed count/lb. compared to the base number of seeds/lb. for that crop; fluid ounces per number of seeds (i.e., 1,000, 80,000, 140,000) does not need to be adjusted. For example, if there are 2,800 soybean seeds/lb. and the targeted rate is 0.095 mg. AI/seed at a non adjusted rate per 2.0 fl. oz. /100 lb. of seed, use: (2,800 ÷ 3,000) x 2.0 = 1.87 fl. oz./100 lb. of seed.

**USE RESTRICTIONS:**

DO NOT graze or feed livestock on soybean forage or hay.

**SUGARBEETS**

To provide early season protection of seedlings against injury by listed pests apply as a seed treatment at the specified rates.

**For Use In Commercial Seed Treatment Facilities**

<b>Target Pests</b>	<b>Use Rate</b>
Whitefly Aphids / Leafhoppers (including vectors that may spread Curly top and Yellow mosaic virus) Root aphids Thrips Wireworms	3.0 to 6.25 fluid ounces of this product in or on a unit of pelleted sugar beet seed with a weight ratio of 2:1 pelleting mixture to raw seed (seed count 100,000 seed approximately 1 kilogram by weight). Apply in a film coat directly to raw seed (100,000 seed or approximately 1 kilogram by weight) at a rate of 3.0 fluid ounces per unit of seed. If rates exceed 3.0 fluid ounces per unit seed must be pelleted.

**WHEAT, BARLEY, OATS, RYE, TRITICALE**

To provide early season protection of seedlings against injury by listed pests, apply as a seed treatment at the specified rates.

**For Use In Commercial Seed Treatment Facilities**

Target Pests	Fl. oz. product/100 lbs. bag
Aphids (including Bird cherry oat, English gram, Greenburg, and Russian wheat aphid), Hessian fly	1.0 - 3.0
For Suppression of Wireworm	0.16 - 0.33
Grasshopper	1.5 - 3.0

Use the higher rate within the specified range to provide increased length of protection and to reduce potential spread of Barley yellow dwarf virus due to aphid vectors.  
 To reduce early season damage caused by grasshopper, this product's treated seed may be planted as a 50- to 60-foot border around the edges of the field. Consult your local university extension entomologist for details regarding grasshopper control in your area. For maximum effectiveness seed should be treated uniformly.

**For End Use Application At Agricultural Establishments**

Apply using a Total Slurry Treater (TST) Farmer Applied Seed Treater (FAST) Farmer Air Pressure System (FAP) or other on farm liquid or slurry seed treating equipment to deliver accurate rates of this product to achieve optimum product performance. Combine this product with an approved Willowood fungicide product for seed and seedling protection against fungal pathogens. Dilution with water may be necessary depending on fungicide formulation used. This product may also be applied on farm as an over treatment to seed pretreated with a fungicide in this case dilution is necessary.

**USE RESTRICTIONS**

DO NOT graze or feed livestock on treated areas for 45 days after planting.

**ADDITIONAL USES**

**Stored Seed Protection:** When applied according to use directions and at labeled rates equal to or above 1.0 fluid ounce per 100 lbs. of seed, this product will provide protection to seed against injury from the following insects: Indian Meal Moth (*Plodia interpunctella*), Rice Weevil (*Sitophilus oryzae*), Red Flour Beetle (*Tribolium castaneum*) and Lesser Grain Borer (*Rhizopertha dominica*). It is recommended that seed with existing populations of stored gram pests be fumigated prior to treating and bagging seed.

## STORAGE AND DISPOSAL

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

**Pesticide Storage:** Store in a cool, dry place, out of direct sunlight, and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area. Handle and open container in a manner as to prevent spillage. If the container is leaking, invert to prevent leakage. If container is leaking or material spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides below. In spill or leak incidents, keep unauthorized people away.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

### CONTAINER DISPOSAL:

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

## LIMITATION OF WARRANTY AND LIABILITY

Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Willowood LLC. To the extent consistent with applicable law, such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. To the extent consistent with applicable law, no agent of Willowood LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT

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