

87290-39

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



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

NOV 19 2013

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

Subject: Amended label adding pollinator protection language
Product Name: Willowood Imidacloprid PCO
EPA Reg. No. 87290-39
EPA Decision No. 484431
Submission dated September 30, 2013

Dear Ms. Wagner:

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

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

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

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

Regards,

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

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

Willowood Imidacloprid PCO

For use by individuals/firms 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.

Prevents and controls subterranean 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.....21.4%

OTHER INGREDIENTS:.....78.6%

Total:.....100.0%

Contains 2 pounds of imidacloprid per gallon.

Shake well before using.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
NOTE TO PHYSICIAN: No specific antidote is available. Treat the patient symptomatically.	
Have a product container or label with you when calling a poison control center or doctor, or going for treatment.	
Emergency Numbers: For 24-hour medical emergency assistance (human or animal) call 1-800-222-1222 . For chemical emergency assistance (spill, leak, fire, or accident) call ChemTrec at 1-800-424-9300 .	

See inside booklet for additional PRECAUTIONARY STATEMENTS.

EPA Reg. No. 87290-39

EPA Est. No. _____

Net Contents: _____ gal.

Manufactured for:

Willowood LLC
1600 NW Garden Valley Blvd, Ste 120
Roseburg, OR 97471

ACCEPTED

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

EPA. Reg. No. 87290-39

NOV 19 2013

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Harmful if absorbed through skin. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse.

If treating an area adjacent to an existing structure, the applicator must check the area to be treated, including all immediate adjacent areas of the structure, for visible and accessible cracks and holes in order to prevent leaks and/or significant product exposure to persons or animals occupying the structure. People present and/or residing in the structure during treatment must be advised to remove all pets and themselves from the structure if they see any sign of leakage. After treatment, the applicator is required to check for leaks. All leaks resulting in the presence of termiticide in locations other than those prescribed on this label must be cleaned up completely prior to leaving the treatment site. Do not allow people or pets to come into contact with contaminated areas or to reoccupy contaminated areas until clean up is complete.

Personal Protective Equipment (PPE):

Pesticide handlers, mixers, loaders, and applicators must wear:

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

Once the product is diluted according to label instructions, shirt, pants, socks, and shoes must be worn. In addition, all pesticide handlers must wear protective eyewear when working in non-ventilated spaces or when applying this product by rodding or sub-slab injection.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply 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 washwater. Apply this product only as instructed on this label. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops/plants or weeds. Do not apply this product or allow it to drift to blooming crops/plants or weeds if bees are foraging the treatment area.

Extreme care must be taken to avoid runoff when applying this product. Apply this product to soil or other fill substrate that will accept the product solution at specified rates. Do not treat water-saturated soil or frozen soil, or in any circumstance where run-off or movement from the treated area can occur.

DIRECTIONS FOR USE

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

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.

If Treating Around Wells or Cisterns

Use only the treated backfill method described in the **Treatment Around Wells and Cisterns** section of this label when structures contain wells or cisterns within the foundation of the structure. Consult state and local guidelines for specific distances of wells from treated areas. If no regulations exist, refer to Federal Housing Administration Specifications (H.U.D.) for instructions.

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

Refer to the mixing table for specified amounts of Willowood Imidacloprid PCO to be used, depending on the container size.

Mix the termiticide use dilution as follows:

- Fill the tank $\frac{1}{4}$ to $\frac{1}{3}$ full.
- For large sprayers, start the pump to initiate bypass agitation and put the end of the treating tool into the tank to allow circulation through the hose.
- Add the specified amount of Willowood Imidacloprid PCO.
- Add remaining water.
- Leave pump running to allow circulation through the hose for 2-3 minutes.

Mix the following amount of Willowood Imidacloprid PCO for 240 mL size			
Gallons of Water		0.05% (mL)	0.1% (mL)
1	PLUS	8	16
2		16	32
5		40	80
10		80	160

Mix the following amount of Willowood Imidacloprid PCO for 55 fl. oz. size			
Gallons of Water		0.05% (fl. oz.)	0.1% (fl. oz.)
1	PLUS	0.3	0.6
25		6.9	13.8
50		13.8	27.5
100		27.5	55.0

Proportional Injector Mixing Table for Willowood Imidacloprid PCO	
Injector Volume (fl. oz. per gal.)	Concentration Percent (%)
0.3	0.05
0.6	0.10

In-Line Injection

Use the proportional injector mixing table to determine the correct amount of Willowood Imidacloprid PCO for the desired application rate for a given injection volume of finished emulsion.

Conversion Key:

1 fluid ounces equals	29.5 mL
1 pint equals	16 fl. oz.
1 gallon equals	8 pints OR 128 fl. oz.

Application Volume

Application volumes listed in this label should be used whenever possible. If soil conditions will not accept 4 gallons of Willowood Imidacloprid PCO per 10 linear feet, double the Willowood Imidacloprid 2SC PCO concentration in 2 gallons of solution per 10 linear feet. For example, if 0.05% is the rate to be applied in 4 gallons of water, then 2 gallons of 0.1% dilution can be used per 10 linear feet to deliver an equivalent amount of Willowood Imidacloprid PCO Insecticide per unit of soil.

Control Information

Any number of issues can impact termite control including state regulations, application equipment, soil type, construction practices and pest pressure. Termiticide soil treatment is meant to establish a consistent and unbroken (horizontal and vertical) treatment zone around a structure in order to prevent access to wood and other food sources by termite colonies. Applicators must comply with all federal, state, and local regulations and treatment standards when applying this product.

Willowood, LLC recommends treatment of above ground colonies in landscape areas. Do not allow this product to contact blooming plants if bees are foraging the treatment area. Use a 0.05% dilution for treatment under normal conditions; however, 0.1% may be required in severe and/or persistent infestations.

Pre-Construction Applications

Do not apply this product at a lower dosage and/or concentration than what is specified on this label for applications prior to installation of the finished grade. Before applying this product, applicators must notify the general contractor, construction superintendent, or other responsible party of the intended termiticide treatment and intended sites to be treated. The applicator is to instruct the responsible party to notify construction workers and other personnel to leave the area to be treated during application and wait to reenter the area until the product is absorbed into the soil.

Concrete Slab-on-Ground or Basement Treatments

Apply this product to the entire surface of soil or other substrate to be covered by the slab including areas under carports, porches, basement floors, and entrance platforms. Apply 1 gallon of solution to accurately and uniformly cover 10 square feet. If the treatment area consists of gravel or any other coarse aggregate, apply 1.5 gallons or sufficient volume of solution to accurately and uniformly cover 10 square feet. Apply 4 gallons of solution per 10 linear feet to provide a uniform treated zone, in soil at critical areas such as along the inside of foundation walls, around plumbing, bath traps, utility services, and other features that penetrate the slab.

After grading is complete, apply this product 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 space rod holes so that it allows 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 per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be approximately 6 inches wide and 6 inches deep. 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 soil and spray solution together as they are being placed into the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply to the solution so that it reaches the footing by injecting into the lower areas of the wall, just above the floor or footing.

If treating foundations deeper than 4 feet, apply this product as the backfill is being replaced. If the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum 4 foot depth after 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 specified rates from grade to a minimum 4 foot depth. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not exceeding the bottom of the footing. Under no circumstances should a structure be treated below the footing.

Rodding in trench followed by flooding of trench and treatment of backfill may provide better opportunity to achieve a continuous chemical treated zone than using soil rodding alone to establish a vertical termiticide treated zone.

Crawl Spaces

Apply 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 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 the top of the footing or a minimum of 4 feet. When rodding, rod holes should 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 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 for possible areas of runoff in order to prevent application leakage in treated areas. Some areas may need mechanical alteration or may not be treatable depending on the risk of leakage.

Any areas where leaks of termiticide product into untreated areas or areas other than those listed on this label must be cleaned up completely before leaving the application site (see Precautionary Statements). People and pets must not reoccupy contaminated areas of structures until clean up is complete.

Post-Construction Treatment

Concrete Slab-On-Ground

To apply under a slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Space drill holes to allow for application of a continuous chemical treated zone. Treat all existing cracks and cold, construction or expansion joints. Treat around bath traps, plumbing, and utility services which penetrate the slab. Apply 4 gallons of solution per 10 linear feet per foot of depth to provide uniform coverage. **DO NOT TREAT STRUCTURE UNTIL THE LOCATION OF HEAT AND/OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CARE TO AVOID CONTAMINATION OF DUCTS AND VENTS.** Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be non-cellulose material or covered by an impervious, non-cellulose material.

Trench or trench and rod around the outside of the foundation wall. Apply 4 gallons of solution per 10 linear feet per foot of depth to provide uniform coverage. When trenching, the trench along the outside foundation should be six inches wide and six inches deep. Use a low pressure spray to treat soil as it is being placed into the trench.

Rodding can be done from the bottom of a shallow trench. Space rod holes in a manner that allows for continuous chemical treatment, not exceeding 12 inches, to be deposited along the treated area. Rod hole depth should not extend below the footing.

Bath Traps

Exposed soil or soil covered with tar or a similar type of 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 pre-sent. 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 the area, if possible, and treat according to crawl spaces instructions under **Pre-Construction Treatment**. If excavating is not possible, crawl space soil and wood treatment may be used to prevent surface access by termites. Apply 1 gallon of solution per 10 square feet to provide a uniform chemical treated zone. Use a very coarse spray at a maximum pressure of 25 PSI at the treatment tool when the valve is open. If a crawl space area can't be reached with an application wand, use an extension wand or other suitable equipment to apply a coarse spray onto the soil, wood, and structural members contacting the soil at the above rate. Do not apply at pressures exceeding 25 PSI at the treatment tool to inaccessible crawl space areas. Application 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. Do not space holes further than 16 inches apart. Many states have smaller drill hole intervals so check state regulations prior to applying this product.

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 per 10 square feet to provide a uniform chemical treated zone.

Shallow Foundations

For foundations less than 1 foot deep, dig a narrow trench 6 inches wide and 6 inches deep along the outside of the foundation walls, being careful not to dig below the bottom of the footings. If foundation footings are exposed, dig a trench alongside the footing being care not to undermine the footing. Apply 4 gallons of solution per 10 linear feet to the top of the footer to provide a uniform treated zone. Apply the dilution to the trench and mix with soil as it is placed into the trench.

Basements (Inside Perimeter)

To treat the inside perimeter of basements, drill along the perimeter of the interior walls. Apply around sewer pipes, floor drains, conduits, expansion joints, along cracks, and in holes in the basement floor. Apply 4 gallons solution per 10 linear feet to provide uniform treatment area.

Space drill holes such that they will allow for application of a continuous chemical treated zone. Plug and fill drill holes in common areas of the building with a suitable sealant. Plugs must be non-cellulose material or must be covered by an impervious, non-cellulose material.

Hollow Block Foundation or Voids

Treat hollow block foundations and voids in masonry resting on footings 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 holes should be spaced no

further than 16 inches apart. Many states have smaller drill hole intervals so check state regulations prior to applying this product.

Treatment of voids in block or rubble foundation walls must be closely examined for possible areas of runoff in order to prevent application leakage in treated areas. Some areas may need mechanical alteration or may not be treatable depending on the risk of leakage.

Any areas where leaks of termiticide product into untreated areas or areas other than those listed on this label must be cleaned up completely before leaving the application site (see Precautionary Statements). People and pets must not reoccupy contaminated areas of structures until clean up is complete.

Plenums

For plenum-type structures using a sealed underfloor space to circulate heat and/or cooled air, apply 4 gallons of solution 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 6 inches deep or by trenching and rodding (where conditions allow) or to the top of the footing. When trenching or rodding is not feasible, make a surface application adjacent to interior foundation walls, do not create a treatment strip exceeding 18 inches wide, horizontally from foundation walls, piers or pipes. Surface application rate is 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not exceeding 25 PSI when the treatment tool valve is on).

When treating plenums, turn off the air circulation system until treatment is complete and all termiticide product has been absorbed into the soil.

Treatment around Wells or Cisterns

DO NOT CONTAMINATE WELLS OR CISTERNS.

Structures with well/cisterns inside foundations, and/or structures that contain well or cisterns within the foundation of a structure can only be treated using the following instructions:

1. Do not treat soil beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside and away from the foundation. The treated backfill technique is as follows:
 - a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
 - b. Treat soil at 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 the solution into the soil thoroughly taking care to contain the liquid and prevent runoff or spillage.
 - c. When treated soil has completely absorbed the solution, return the soil to the trench.
2. Treat infested and/or damaged wood in place using the following injection technique found 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 of this product.

1. Prior to treatment and if possible, expose 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 must take precautions to avoid application of this product into subsurface drains that could empty into any body of water. These precautions include evaluating whether application of this product to the top of the footer may result in contamination of a subsurface drain. Factors such as depth to the drain system, soil type, and degree of compaction must be taken into consideration when determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique described above can be used to minimize off-site movement of termiticide.

FOAM APPLICATIONS

Soil subsidence, construction practices, and other factors can create situations where a continuous chemical treated zone cannot be achieved using conventional treatment practices. In necessary situations, conventional application methods can be supplemented by using foam application, or by using similar devices to provide a continuous treated zone.

Foam application can 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 the appropriate concentrate of Willowood Imidacloprid PCO in water and add the manufacturer's specified quantity of foam agent to the product solution (see tables below for foaming instructions). Apply sufficient volume this product along or in combination with liquid solution to provide a continuous treated zone at the specified rates for specific application sites.

Mixing Table for Willowood Imidacloprid PCO Foam (240 mL size only)

Willowood Imidacloprid PCO (mL)	Gallons of Water	Foam Expansion Ratio	Finished Foam	
40	1	5:1	5 gallons	0.05% a.i.
80	1	10:1	10 gallons	
160	1	20:1	20 gallons	
Add the manufacturer's specified quantity of foam agent to the Willowood Imidacloprid PCO solution.				

Mixing Table for Willowood Imidacloprid PCO Foam (55 fl. oz. size only)

Willowood Imidacloprid PCO (fl. oz.)	Gallons of Water	Foam Expansion Ratio	Finished Foam	
6.9	1	25:1	25	0.5% a.i.
	2.5	10:1		
	5	5:1		
13.8	1	50:1	50	
	2.5	20:1		
	5	10:1		
Add the manufacturer's specified quantity of foam agent to the Willowood Imidacloprid PCO solution.				

Depending on the circumstances, foam applications can be used alone or in combination with liquid solution applications. Applications can 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 crawl spaces, and other similar voids.

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. A minimum of 75% of the gallons of Willowood Imidacloprid PCO must be applied as a typical liquid treatment. The remaining 25% or less is delivered to appropriate locations using a foam application.

Control of WoodInfesting Pests

For control of above ground termites and carpenter ants in local areas, apply a 0.05 to 1.0% solution or sufficient volume of Willowood Imidacloprid PCO foam to voids and galleries in damaged wood, 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, 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 of 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.

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, use a 0.05% to 0.1% solution. If possible, locate the interior infested cavity and inject a 0.05 to 0.1% solution or sufficient volume of Willowood Imidacloprid PCO foam using an appropriate treatment tool with a splashback guard. The applicator can also treat 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 contact(s). Place rod holes 3 inches away from soil contact point(s) and do not space more than 12 inches apart along the perimeter of the soil contact(s). For small posts or poles, (less than 6 inch 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.

Inject termite carton nests in trees with 0.05 to 0.1% solution or sufficient volume of foam using a pointed injection tool. It may be necessary to make multiple injection points of varying depths. Remove carton material from tree is desirable but not necessary when foam applications are used. To prevent reinfestation by termites in the soil, a perimeter treatment of a 0.05% to 0.1% solution applied around the root flare may be required. For small trees less than six 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).

To protect firewood and other wood products stored in contact with soil from carpenter ants and termites, treat soil prior to stacking wood 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 (including, but not limited to: powder post beetles, anobid or deathwatch beetle, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles. Treat galleries and structure voids with sprays, mists, or foams using 0.05% to 0.1% Willowood Imidacloprid PCO solution. Use visual clues to locate galleries (frass or pellets, blistered wood, emergence or clean out holes), live insects, mechanical sounding techniques, or listening devices (i.e., stethoscopes, acoustic emission detectors). Drill holes through the gallery system to receive the injector tip or treatment tool. Drill holes should be spaced to adequately cover the gallery system. **IMPORTANT: AVOID DRILLING WHERE ELECTRICAL WIRING, PLUMBING LINES, ETC. ARE LOCATED.** Use a lower pressure spray solution (no more than 20 PSI) to mist, spray, or foam treatment area. Do not apply excessive product to the point of leakage from adjacent holes. **DO NOT APPLY WHERE ELECTRICAL SHOCK HAZARDS EXIST.** Seal drill holes after treatment. Spray or mist wood surfaces with a 0.05% to a 0.1% solution, or use a sufficient volume of foam, if foam application is appropriate. If surfaces are inaccessible, drill and treat the interior of structural voids. Treated surfaces can include exposed wooden surfaces in crawl spaces, basements, and attics. Exterior wooden surfaces include decks, fencing, siding, structural voids, channels in damaged wood in spaces between wooden members of a structure, and junctions between wood and foundations. Apply to wood surfaces by brushing or spraying with a coarse, low pressure (no more than 20 PSI) sprayer. Apply this product to the point of wetness, but avoid applying to the point of runoff. When applying to overhead areas such as ceilings in living areas, cover surfaces below the treatment area with plastic sheeting or similar liquid repelling material. Avoid contact with treated surfaces until sprays have dried. Repeat as necessary to maintain protection.

Localized Treatment of Carpenter Bees

Apply 0.05% to 0.1% of product solution as a spray, mist, or as a foam. Spray directly into gallery entrance holes. Plug entrance holes after treatment with small pieces of steel wool or similar material.

Retreatment

Retreat areas if there is clear evidence of reinfestation or disruption of the treated area due to construction, excavation, landscaping, and/or evidence of the break-down of termiticide treated zone in the soil. Retreat vulnerable and/or reinfested areas according to the use directions specified in this label. Timing and type of treatment method may vary, depending on termite pressure, soil type, soil conditions, and other factors that may reduce the efficacy of the treated zone. Retreatment can be made as either spot treatment or complete treatment.

Retreatment can be performed if the structure was last treated five or more years ago if it is unknown whether a structure and the treated zone has not been disturbed, and if the applicator determines that it is necessary to retreat in order to ensure adequate protection of the structure. To determine the timing of retreatment, the applicator must consider efficacy and degradation data, and site-specific conditions along with previous experience that indicates that the structure is vulnerable to termite infestation.

Annual retreatment is prohibited unless clear evidence of reinfestation exists or the treatment zone has been disrupted.

Perimeter Pest Control

Carpenter Ants

Apply a 0.05% to 0.1% solution as a general surface, spot, crack and crevice, or wall void application to control carpenter ants in houses and other structures. Apply this product around doors, windows,

eaves, attic vents, and other spaces where carpenter ants enter, crawl and/or hide. Spray solution into cracks and crevices, Spray, mist, or foam through small drilled holes into voids where ants and/or nests are present. Apply sufficient volume of spray, mist or foam to adequately cover the area. Repeat treatments as necessary.

To control carpenter ants that tunnel through soil, apply 0.05% to 0.1% solution via drench or inject the solution, using 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 surface.

When nest sites are located, treat the interior cavity and/or nest site by injecting 0.05%t to 0.1% solution as a spray, mist, or foam, using sufficient volume with an appropriate treatment tool with a splashback guard.

Use Restrictions

Plug and fill all holes drilled into concrete slabs of structures with a suitable sealant after treatment. Locate and identify all heat pipes, ducts, water lines, sewer lines, and electrical conduits before applying this product. Do not puncture or inject solution into these structural elements.

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

Do not allow this product to contact plants in bloom if bees are foraging the treatment area.

Avoid contamination of public and private water supplies.

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

Consult State, Federal, and local authorities for additional information on approved treatment practices for areas close to potable water supplies.

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. 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 HANDLING: Nonrefillable container (equal to or less than 5 gallons). Do not refill or reuse 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 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. Then 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.

Nonrefillable container (greater than 5 gallons). Do not refill or reuse container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then 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.

IMPORTANT: READ BEFORE USE

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 unopened product container at once.

To the extent consistent with applicable law, by using the 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 CONSISTENT WITH APPLICABLE LAW, WILLOWOOD LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

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