

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 30, 2014

Alan Schreiber
Agriculture Development Group, Inc.
2621 Ringold Road
Eltopia, WA 99330

Subject: Label Amendment – Agency-initiated action to update spray drift language
Product Name: Protector 2F
EPA Registration Number: 88867-2
Application Date: August 14, 2014
Decision Number: 496635

Dear Dr. Schreiber:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

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.

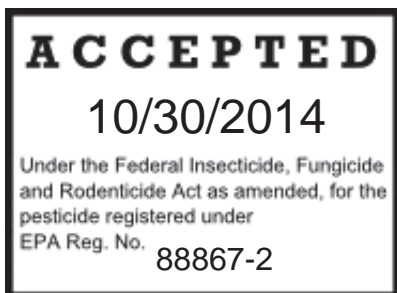
Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, you may contact Jennifer Urbanski at 703-347-0156 or via email at urbanski.jennifer@epa.gov.

Sincerely,

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

Venus Eagle, Product Manager 01
Invertebrate-Vertebrate Branch 3
Registration Division
Office of Pesticide Programs

Enclosure



GROUP **4A** INSECTICIDE

PROTECTOR 2F

**FOR USE ONLY IN WILLAPA BAY/ GRAYS HARBOR, WA, TO
CONTROL BURROWING SHRIMP IN COMMERCIAL SHELLFISH BEDS**

ACTIVE INGREDIENT:

Imidacloprid: 1-[(6-Chloro-3-pyridiny)methyl]-N-nitro-2-imidazolidinimine.....	21.4%
OTHER INGREDIENTS:	76.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon.

KEEP OUT OF REACH OF CHILDREN CAUTION-CAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

EPA Reg. No. 88867-2

EPA Establishment No.

SHAKE WELL BEFORE USING

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.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information

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 inhaled. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

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

Follow manufacturer's instructions for cleaning/maintaining PPE. If instructions for washables do not exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS STATEMENTS

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

USER SAFETY RECOMMENDATIONS

Users Must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Wash contaminated area thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing.

ENVIRONMENTAL HAZARDS

Do not contaminate water when disposing of equipment wash waters. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops and weeds. Do not allow this product to drift to blooming crops or weeds are visiting the treatment area. This product is toxic to wildlife and highly toxic to aquatic invertebrates.

DIRECTIONS FOR USE

It is a violation of the Federal law to use this product in a manner inconsistent with its labeling. A copy of this label must be in the possession of the user at the time the product is applied.

READ THIS LABEL: Read the entire label and follow all use directions and precautions.

For use only to control burrowing shrimp in intertidal commercial shellfish beds of Washington State's Willapa Bay and Grays Harbor.

MIXING INSTRUCTIONS:

To prepare the application mixture, add a portion of the required amount of water to the spray tank, begin agitation, and add the Protector 2F. Complete filling tank with the balance of water needed. Be sure to maintain agitation during both mixing and application.

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

APPLICATION INSTRUCTIONS:

To control burrowing shrimp in intertidal commercial shellfish beds [of Washington State's Willapa Bay and Grays Harbor], apply at a maximum rate of 0.5 lb a.i.imidacloprid /acre per year using the following properly calibrated application equipment:

- Helicopters equipped with boom $\frac{3}{4}$ as long as rotor diameter equipped with Accuflo or similar nozzles
- Backpack sprayer.
- Ground based vehicle with boom.

RESTRICTIONS:

- Do not harvest shellfish within thirty days after treatment.
- All ground must be properly staked and flagged to protect adjacent shellfish and water areas. For aerial applications, the corners of each plot must be marked so the plot is visible from an altitude of at least 500ft.
- Aerial applications must be on beds exposed at low tide.
- A single application of imidacloprid per year is allowed.
- No adjuvants or surfactants are allowed with the use of this product.
- All applications must occur between April 15 and December 15.
- A 100-foot buffer zone must be maintained between the treatment area and the nearest shellfish to be harvested when treatment is by aerial spray; a 25 foot buffer zone is required if treatment is by hand spray.
- Do NOT apply when winds are greater than 10 mph or during temperature inversions.
- Do not apply aerially during Federal holiday weekends. During aerial applications, all public access areas within one-quarter (1/4) mile and all public boat launches within a quarter (1/4) mile radius of any bed scheduled for treatment shall be posted. Public access areas shall be posted at 500 feet intervals

at those access areas more than 500 feet wide. Signs shall be a minimum of 8 ½ x 11 inches in size, and be made of a durable weather-resistant, white material. The sign will say "Imidacloprid will be applied for burrowing shrimp control on [date] on commercial shell fish beds. Do not Fish, Crab or Clam within one-quarter mile of the treated area. The location of the treated area will be included on the sign.

- The sign will include lettering shall be in bold black type with the word "WARNING" or "CAUTION" at least one-fourth (1/4) of an inch high. Signs shall be posted so they are secure from the normal effects of weather and water currents, but cause no damage to private property. Signs shall be posted at least 2 days prior to treatment and shall remain for at least 30 days after treatment.

SPRAY DRIFT MANAGEMENT:

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determines the potential for spray drift. The applicator and the entity authorizing spraying are responsible for considering all these factors when making decisions.

To minimize spray drift, the applicator should be familiar with and take into account the following drift reduction advisory information. Additional information may be available from state enforcement agencies or the Cooperative Extension on the application of the product.

The best drift management strategy and most effective way to reduce drift potential are to apply large droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see WIND, TEMPERATURE AND HUMIDITY, and TEMPERATURE INVERSIONS).

CONTROLLING DROPLET SIZE

- Volume – Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure – Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types, lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- Number of Nozzles – Use the minimum number of nozzles that provide uniform coverage.
- Nozzle Orientation – Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is recommended practice. Significant deflection from the horizontal will reduce droplet size and increase drift potential.
- Nozzle Type – Use a nozzle type that is designed for the intended application. With most nozzle types, narrow spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift. Do not use nozzles producing a mist droplet spray.

APPLICATION HEIGHT

Making applications at the lowest possible height (helicopter, ground driven spray boom) that is safe and practical reduces exposure of droplets to evaporation and wind. Swath adjustment distance should increase with increasing drift potential (higher wind, smaller droplets, etc.).

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type, determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE INVERSIONS

Drift potential is high during a temperature inversion. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud, which can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

AERIAL APPLICATION METHODS AND EQUIPMENT HELICOPTERS ONLY

Water Volume: Use 2 or more gallons of water per acre. The actual minimum spray volume per acre is determined by the spray equipment used. Use adequate spray volume to provide accurate and uniform distribution of spray particles over the treated area and to avoid spray drift.

Managing spray drift from aerial applications: Applicators must follow these requirements to avoid off-target drift movement: 1) boom length – the distance of the outmost nozzles on the boom must not exceed ¾ the length of the rotor, 2) nozzle orientation – nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees, and 3) application height – without compromising helicopter safety, applications should be made at a height of 10 feet or less above the crop canopy or tallest plants. Applicators must follow the most restrictive use cautions to avoid drift hazards, including those found in this labeling as well as applicable state and local regulations and ordinances.

GROUND APPLICATION (BROADCAST)

Water Volume: Use 5 or more gallons of water per acre. The actual minimum spray volume per acre is determined by the spray equipment used. Use adequate spray volume to provide accurate and uniform distribution of spray particles over the treated area and to avoid spray drift.

Spray tank should have constant agitation to assure adequate mixing of product.

AERIAL APPLICATIONS

All precautions should be taken to minimize or eliminate spray drift. Helicopters can be used to apply PROTECTOR 2F; however, DO NOT make applications by helicopter unless appropriate buffer zones can be maintained to prevent spray drift out of the target area, or when spray drift as a result of helicopter application can be tolerated. Aerial equipment designed to minimize spray drift, such as a helicopter

equipped designed to minimize spray drift, such as a helicopter equipped with a Microfoil™ boom, Thru-Valve™ boom or raindrop nozzles, must be used and calibrated. Except when applying with a Microfoil boom, a drift control agent may be added at the recommended label rate. To avoid drift, do not make applications when winds are greater than 10 MPH or any other conditions which allow drift. Because the potential for spray drift is high during temperature inversions, do NOT make applications during temperature inversions.

GROUND APPLICATIONS

Low Volume. Use equipment calibrated to deliver 5 to 20 gallons of spray solution per acre.

For low volume, selected proper nozzles to avoid over-application. Proper application is critical to ensure desirable results.

Mixing and Loading Requirements

The use of a properly designed and maintained containment pad for mixing and loading of any pesticide into application equipment is recommended. If containment pad is not used, maintain a minimum distance of 25 feet between mixing and loading areas and potential surface to groundwater conduits such as field sumps, uncased well heads, sinkholes, or field drains.

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 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 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 at an approved waste disposal facility.

CONTAINER DISPOSAL [HANDLING]:

For containers smaller than 5 gallons: 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 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. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Containers Larger than 5 Gallons: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse or pressure rinse container (or equivalent)

promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 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.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

This product is registered by the Willapa-Grays Harbor Oyster Growers Association, 2621 Ringold Road, Eltopia, Washington. 509 266 4348.