

3/10/2014

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



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

March 10, 2014

Ms. Laura Phelps
Makhteshim Agan of North America, Inc.
3120 Highwoods Blvd. #100
Raleigh, NC 27604

Subject: Label notification to remove marketing claims, add an address, add the IRAC group, and correct the measurement unit for shrubs, per PRN 98-10

Dear Ms. Phelps:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10, dated February 20, 2014, for "Quali-Pro Imidacloprid 75 WSB," EPA Registration Number 66222-199.

The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 and finds that the label changes requested do fall within the scope of PRN 98-10. The label submitted with your application has been date-stamped "Notification" and will be placed in our files.

If you have any questions, please contact me directly at 703-308-8735 or email me at chao.julie@epa.gov.

Sincerely,

A handwritten signature in cursive script, 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

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 66222-199	2. EPA Product Manager 1	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Quali-Pro Imidacloprid 75 WSB	PM# Venus Eagle	
5. Name and Address of Applicant (Include ZIP Code) Makhteshim Agan of North America, Inc. 3120 Highwoods Blvd#100 Raleigh, NC 27604 <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. _____ Product Name _____	

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 - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Makhteshim Agan of North America, Inc. (MANA) is submitting Notification to update wording on the label.

NOTIFICATION

MAR 10 2014

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container If "Yes" Package wgt No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input 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 type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Laura Phelps	Title Registration Manager	Telephone No. (Include Area Code) 919-256-9329
Certification 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 <i>Laura Phelps</i>	3. Title Registration Manager	
4. Typed Name Laura Phelps	5. Date 20 Feb 2014	

RESUBMISSION

Registration Action: Notification
Fee Category: NA
Registration Fee: NA

February 20, 2014

Document Processing Desk (Notif)
Office of Pesticide Programs (7504P)
U.S. EPA, One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington, VA. 22202-4501

ATTN: Venus Eagle PM1
RE: Notification of label updates per PR Notice 98-10. (EPA Reg. No. 66222-199)

Dear Ms Eagle,
Makhteshim Agan of North America would like update the attached label noted as follows.

1. Remove Merit comparison
2. Add address
3. Add insecticide Group
4. Page 8 correct inches to feet as the proper measurement for shrub height

- In support of this notification please find
- EPA Forms 8570-1. Application for Pesticide Amendment
 - A copy of the amended label with changes highlighted
 - A copy of the amended label, clean

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.

Please email me at lphelps@manainc.com or phone me at (919) 256-9329 if you have any questions.

Sincerely,

Laura Phelps

Laura Phelps
Product Registration Manager

MANA
manainc.com

lphelps@manainc.com

E-SUBMISSION

www.manainc.com

P: (919) 256-9300
F: (919) 256-9305

3120 Hightwood's Blvd.
Suite 100
Raleigh, NC 27604



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GROUP	4A	Insecticide
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QUALI-PRO IMIDACLOPRID

75 WSB

Insecticide in Water Soluble Packets

For foliar and systemic insect control in turfgrass (Including sod farms), landscape
ornamentals, fruit and nut trees, and interior plantscapes.

ACTIVE INGREDIENT:

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

75%

OTHER INGREDIENTS:.....

25%

TOTAL

100%

Do Not Remove Packets From Container Except For Immediate Use.

Keep water soluble packets in this container and store in a cool dry place but not below freezing (32° F).

Reg. No. 66222-199

EPA Est. No. 39578-TX-001

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCION

Manufactured for:

Makhteshim Agan of North America, Inc.
3120 Highwoods Blvd
Raleigh NC 27609
and
Control Solutions Inc.
5903 Genoa Red Bluff
Pasadena, Texas, 77507, USA

NOTIFICATION

MAR 10 2014

How can we help? 1-866-406-MANA(6262)

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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.

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.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact Prosar at 1-877-250-9291 for emergency medical treatment information.</p>	
<p>Note To Physician: No specific antidote is available. Treat the patient symptomatically.</p>	

For additional precautionary, handling, and use statements, see inside of this booklet.

Net Contents: 6.4 Ounces (4 x 1.6 Ounce Water-Soluble Packets)

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

CAUTION: Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment (PPE)

WPS Uses: Applicators and other handlers who handle this product for any use covered by the Worker Protection Standard (40 CFR part 170) – in general, agricultural plant use e.g. use on sod farms, 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. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.
- Shoes plus socks

Follow manufacturer's instructions for cleaning, maintaining personal protective equipment, PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Non-WPS Uses: Applicators and other handlers who handle this product for any use NOT covered by the Worker Protection Standard (40 CFR part 170) must wear:

- Shirt and pants
- Gloves
- Shoes plus socks

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.

<p style="text-align: center;">User Safety Recommendations</p> <p>User should:</p> <ul style="list-style-type: none"> • Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. • Remove clothing 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 highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

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. This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of


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this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.

Look for the bee hazard icon  in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar.

Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When Using This Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator attractive plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at: <http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>.

Pesticide incidents (for example, bee kills) should immediately be reported to the state/tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at: www.npic.orst.edu or directly to EPA at: beekill@epa.gov

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

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.

See individual sites for specific pollinator protection application restrictions. If none exist under the specific site, for foliar applications, follow these application directions for food/feed crops and commercially grown ornamentals that are attractive to pollinators, and for non-agricultural uses:



FOR FOOD/FEED CROPS AND COMMERCIALY GROWN ORNAMENTALS NOT UNDER CONTRACT FOR POLLINATION SERVICES BUT ARE ATTRACTIVE TO POLLINATORS

Do not apply this product while bees are foraging. Do not apply this product until flowering is complete and all petals have fallen unless one of the following conditions is met:

- The application is made to the target site after sunset
- The application is made to the target site when temperatures are below 55°F
- The application is made in accordance with a government-initiated public health response

- The application is made in accordance with an active state-administered apiary registry program where beekeepers are notified no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying
- The application is made due to an imminent threat of significant crop loss, and a documented determination consistent with an IPM plan or predetermined economic threshold is met. Every effort should be made to notify beekeepers no less than 48-hours prior to the time of the planned application so that the bees can be removed, covered or otherwise protected prior to spraying.



Non-Agricultural Uses:

Do not apply Quali-Pro Imidacloprid 75 WSB Insecticide while bees are foraging. Do not apply Quali-Pro Imidacloprid 75 WSB Insecticide to plants that are flowering. Only apply after all flower petals have fallen off.

AGRICULTURAL USE REQUIREMENTS

Use this product only 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 interval. 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 product is applied by drenching, 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, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.
- Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Keep children and pets off treated area until dry.

State Specific Restrictions:

- The state of Arizona has not approved this product for use on agricultural sites. Do not use this product on uses considered by the Arizona statutes to be agricultural uses.

TURFGRASS (INCLUDING SOD FARMS, LANDSCAPE ORNAMENTALS, FRUIT & NUT TREES, AND INTERIOR PLANTSCAPES)

Mixing: Inside each foil pouch is a clear inner water soluble packet containing the QUALI-PRO IMIDACLOPRID 75 WSB. Do not allow packets to become wet prior to adding to the spray tank. Do not handle the clear inner packets with wet hands or wet gloves. Rough handling may cause breakage. Reseal outer carton to protect remaining packets.

To prepare the spray mixture, remove the outer foil pouch and drop the required number of unopened, clear water soluble packets, as determined under **Applications**, into the spray tank while filling with water to the desired level. Operate the agitator while mixing. Depending on water temperature and amount of agitation, the packets

should completely dissolve within a few minutes after they are added to the water. Allow longer time for the clear packet to dissolve when using cooler water.

Do not use QUALI-PRO IMIDACLOPRID 75 WSB packets in a tank-mix with products that contain Boron or release free chlorine. The resultant reaction of PVA and boron or free chlorine is a plastic which is not soluble in water or solvents such as diesel oils, kerosene, gasoline or alcohol. Do not attempt to use the packets directly in diesel oils or summer spray type oils as in ULV or LV uses. PVA packets are water soluble not oil soluble. Use of chlorinated water is acceptable.

QUALI-PRO IMIDACLOPRID 75 WSB has been found to be compatible with commonly used fungicides, miticides, liquid fertilizers, and other commonly used insecticides. Check physical compatibility using the correct proportion of products in a small jar test if local experience is unavailable.

Restrictions

Do not apply through any irrigation system.

Do not graze treated areas or use clippings from treated areas for feed or forage. Avoid runoff or puddling of irrigation water following application. Keep children and pets off treated area until dry. Do not apply QUALI-PRO IMIDACLOPRID 75 WSB to areas which are water logged or saturated, or frozen, which will not allow penetration into the root zone of the plant. Do not apply more than 8.6 oz. (0.4 lb of active ingredient) per acre per year.

Treated areas may be replanted with any crop specified on an imidacloprid label, or with any crop for which a tolerance exists for the active ingredient.

For crops not listed on an imidacloprid label, or for crops for which no tolerances for the active ingredient have been established, a 12- month plant-back interval must be observed.

Not for use in commercial greenhouses, nurseries, or on grasses grown for seed, or on commercial fruit and nut trees.

Do not apply this product, by any application method, to linden, basswood or other *Tilia* species.

TURFGRASS

QUALI-PRO IMIDACLOPRID 75 WSB can be used as directed on turfgrass in sites such as home lawns, business and office complexes, shopping centers, residential complexes, golf courses, airports, cemeteries, parks, playgrounds, athletic fields and sod farms to control soil inhabiting pests as listed in the table below.

Effective control can be achieved when applications are made before or during the egg laying period. The timing of applications can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. For best control, apply prior to egg hatch of the target pests followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

Irrigation or rainfall must occur within 24 hours after application to move the active ingredient through the thatch. Do not make applications when turfgrass areas are waterlogged or the soil is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist. The area to be treated must be able to accept vertical penetration of rainfall or irrigation water. Avoid mowing turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.

Do not apply more 8.6 oz. (0.4 lb of active ingredient) per acre per year.

Application Instructions

Apply QUALI-PRO IMIDACLOPRID 75 WSB in sufficient water to provide adequate distribution in the treated area. The use of accurately calibrated equipment normally used for the application of turfgrass insecticides is

required. Use equipment which will produce a uniform, coarse-droplet spray, using a low pressure setting to eliminate off target drift. Check calibration periodically to ensure that equipment is working properly.

Consult your local State Agricultural Experiment Station or State Extension Turf Specialists for more specific information regarding timing of application.

APPLICATION INSTRUCTIONS ON TURFGRASS		
PEST	USE DIRECTIONS	RATE
Larvae of: European Crane Fly, (<i>Tipula paludosa</i>) Annual bluegrass weevil, (<i>Hyperodes</i> spp.) Green June Beetle, (<i>Cotinis nitida</i>) May or June beetle, (<i>Phyllophaga</i> spp.) Asiatic garden beetle, (<i>Maladera castanea</i>) Japanese Beetle, (<i>Popillia japonica</i>) Billbug, (<i>Spherophorus</i> spp.) Northern masked chafer and Southern masked chafer, (<i>Cyclocephala borealis</i> , <i>C. immaculata</i> , and/or <i>C. lurida</i>); Black turfgrass ataenius (<i>Ataenius spretulus</i> and <i>Aphodius</i> spp.) Oriental Beetle, (<i>Anomala orientalis</i>) Cutworms (suppression), (<i>Phyllophaga</i> spp.); European chafer, (<i>Rhizotroqus majalis</i>)	For best results, for the control of grubs, billbugs, European crane fly and annual bluegrass weevil, make application prior to egg hatch of the target pest. Refer to Application Instructions section of the label.	1.6 oz. (1 packet) per 8,250 to 11,000 sq. ft.
Chinchbug (suppression) Mole Crickets, (<i>Scapteriscus</i> spp.)	For suppression of chinchbugs, make application prior to hatching of the instar nymphs. For control of mole crickets make application prior to or during the peak egg hatch period. When adults or large nymphs are present and actively tunneling, application should be accompanied by a curative insecticide. Follow label instructions for other insecticides when tank-mixing.	1.6 oz. (1 packet) per 8,250

RESTRICTIONS

- Do not apply this product in a way that will contact people or pets.
- Do not allow children or pets to enter treated areas until sprays have dried.
- Do not apply to plants in bloom or allow this product to contact plants if bees are foraging.

ORNAMENTALS

QUALI-PRO IMIDACLOPRID 75 WSB is for use on ornamentals in commercial and residential landscapes and interior plantscapes.

Foliar Applications

QUALI-PRO IMIDACLOPRID 75 WSB mixes with water and may be used in a variety of application equipment. Mix product with the required amount of water and apply as directed for the selected use pattern.

When making foliar applications on hard-to-wet foliage such as holly, pine, or ivy, the addition of a spreader/sticker is recommended. If concentrate or mist type spray equipment is used, an equivalent amount of product should be used on the area sprayed, as would be used in a dilute application.

Application Instructions

QUALI-PRO IMIDACLOPRID 75 WSB is a systemic product and will be translocated upward into the plant system from root uptake. Place the product where the growing portion of the target plant can absorb the active ingredient. The addition of a nitrogen containing fertilizer, where applicable, into the solution may enhance the uptake of the active ingredient. Application can be made by foliar application or soil applications; including soil injection, drenches, and broadcast sprays. Foliar applications offer locally systemic activity against insect pests.

When making soil applications to plants with woody stems, systemic activity will be delayed until the active ingredient is translocated throughout the plant. In some cases, this translocation delay could take 60 days or longer. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control.

For outdoor ornamentals, broadcast applications cannot exceed a total of 8.6 oz (0.4 lb of active ingredient) per acre per year.

Ant Management Programs

Use QUALI-PRO IMIDACLOPRID 75 WSB to control aphids, scale insects, mealybugs and other sucking pests on ornamentals to limit the honeydew available as a food source for ant populations. QUALI-PRO IMIDACLOPRID 75 WSB applications can then be supplemented with residual sprays, bait placements or other ant control tactics to further reduce the pest population.

APPLICATION INSTRUCTIONS		
Trees, Shrubs, Evergreens, Flowers, Foliage Plants, Ground Covers, and Interior Plantscapes		
For use only in and around industrial and commercial buildings and residential areas.		
PEST	RATE	INSTRUCTIONS
Adelgids Aphids Japanese beetles Lace bugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassywinged sharpshooter) Mealybugs Psyllids Sawfly larvae Thrips (suppression) Whiteflies	1.6 oz. (1 packet) per 300 gals. of water	Foliar Applications: Start treatments prior to establishment of high pest populations and reapply on an as needed basis.
White grub larvae (such as Japanese beetle larvae, Chafers, <i>Phyllophaga</i> spp. Asiatic garden beetle, Oriental beetle)	1.6 oz. (1 packet) per 8,250 to 11,000 sq. ft.	Broadcast Applications: Mix required amount of product in sufficient water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of water per 1000 sq ft. Irrigate thoroughly to incorporate QUALI-PRO IMIDACLOPRID 75 WSB into the upper soil profile. Refer to FLOWERS and GROUNDCOVERS for additional use directions.

APPLICATION INSTRUCTIONS
Trees, Shrubs, Flowers and Groundcovers
For use only in and around industrial and commercial buildings and residential areas and state, national, and private wooded and forested areas to control the insect pests listed below.

PEST	CROP/RATE	INSTRUCTIONS
Adelgids Aphids Armored scales (suppression) Black vine weevil larvae Eucalyptus longhorned borer Flatheaded borers (including bronze birch borer and alder borer) Japanese beetles Lace bugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassywinged sharpshooter)	TREES 1.6 oz. (1 packet) per 24 to 48 inches of cumulative trunk diameter	Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. Keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per tree. SOIL INJECTION¹: For application to trees - Grid System: Holes should be spaced on 2.5 foot centers, in a grid pattern, extending to the drip line of the tree. Circle System: Apply in holes evenly spaced in circles, (use more than one circle dependent upon the size of the tree) beneath the drip line of the tree extending in from that line. Basal System: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base.
Leafminers Mealybugs Pine tip moth larvae Royal Palm Bugs Sawfly larvae Soft Scales Thrips (suppression) White grub larvae Whiteflies	SHRUBS 1.6 oz. (1 packet) per 24 to 48 feet of cumulative shrub height	For application to shrubs - Apply to individual plants using dosage indicated. SOIL DRENCH: Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone. For Control of Specified Borers: Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing pest damage and tree stress.
	FLOWERS & GROUNDCOVERS 1.6 oz. (1 packet) per 8,250 to 11,000 ft.	Apply as a broadcast treatment and incorporate into the soil before planting, or apply prior to bloom or after all flower petals have fallen off for established plants. If application is made to established plants, irrigate thoroughly after application.

¹ No Soil Injection Applications Allowed in Nassau or Suffolk Counties of New York.

RESTRICTIONS

- Do not apply this product in a way that will contact people or pets.
- Do not allow children or pets to enter treated areas until sprays have dried.

APPLICATION INSTRUCTIONS			
For use only in and around residential areas.			
CROP	PEST	RATE	INSTRUCTIONS

<p>POME FRUIT: Apple, Crabapple, Loquat, Mayhew, Pear, Pear (Oriental), Quince</p>	<p>Aphids (except Woolly apple aphid) Leafhoppers (including glassywinged sharpshooter) Leafminer Mealybugs² San Jose Scale²</p>	<p>1.6 oz. (1 packet) per 300 gals. of water (2.1 oz. per acre¹)</p>	<p>Apply specified dosage as foliar spray as needed after petal-fall is complete.</p> <p>For control of rosy apple aphid, apply prior to leafrolling caused by the pest.</p> <p>For first generation leafminer control, make first application as soon as petal-fall is complete. Greatest control will result from the earliest possible application. For second and succeeding generations, best control is obtained from applications made early in the adult flight against egg and early instar larvae. A second application may be required 10 days later if severe pressure continues or if generations are overlapping. A single application may result in suppression only. QUALI-PRO IMIDACLOPRID 75 WSB will not control late stage larvae.</p> <p>For San Jose Scale, time applications to the crawler stags. Treat each generation.</p> <p>For late season (preharvest) control of leafhopper species, apply QUALI-PRO IMIDACLOPRID 75 WSB while most leafhoppers are in the nymphal stage.</p> <p>For optimal control of mealybug, insure good spray coverage of the trunk and scaffolding limbs or other resting sites.</p> <p>Do not apply more than 2.1 ounces per acre in a single application. Do not make more than 5 applications or exceed a total of 8.6 ounces (0.4 lb ai) per acre per year.</p> <p>Allow 10 or more days between applications. Allow at least 7 days between last application and harvest.</p>
<p>Pecan³</p>	<p>Yellow pecan aphid Black margined aphid Pecan leaf phyloxera Pecan spittlebug Pecan stem phyloxera</p>	<p>1.6 oz. (1 packet) per 300 gals. of water (2.1 oz. per acre¹)</p>	<p>Make foliar applications as pests begin to build before populations become extreme. Two applications at a 10 to 14 day interval may be required to achieve control. Scout and retreat if needed.</p> <p>Thorough uniform coverage of foliage is necessary for optimal control. Addition of an organosilicone-based spray adjuvant at a rate not to exceed the adjuvant manufacturer's recommended use rate may improve coverage.</p> <p>Do not apply more than a total of 6.3 ounces of QUALI-PRO IMIDACLOPRID 75 WSB per acre per year. Do not make more than 3 applications. Allow 10 or more days between applications. Allow at least 7 days between last application and harvest.</p>
<p>¹ The amount of QUALI-PRO IMIDACLOPRID 75 WSB required per acre will depend on tree size and volume of foliage present. The rate per acre is based on a standard of 400 gallons of dilute spray solution per acre for large trees.</p> <p>² Not for use in California for control on pears.</p> <p>³ Use on pecans not permitted in California unless directed by state-specific 24(c) labeling.</p>			

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APPLICATION INSTRUCTIONS

For use only in and around industrial and commercial buildings and residential areas.

CROP	PEST	RATE	INSTRUCTIONS
Grapes	Leafhoppers (including glassy-winged sharpshooter) Mealybugs	1.6 oz. (1 packet) per 300 gal. of water (1.0 oz. per acre)	Apply specified dosage as a foliar spray using 200 gallons of water per acre. Do not apply more than a total of 2.0 ounces of QUALI-PRO IMIDACLOPRID 75 WSB per acre per year. Allow at least 14 days between applications. Applications may be applied up to and including day of harvest.

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. Do not store below freezing (32°F). Exposure to moisture or excessive handling of water soluble packets may cause breakage. Store water soluble packets in original container and out of reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable Container (flexible-bag-all weights): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Then dispose of empty bag in sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid-fifty lbs. or less): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container 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 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.

Handle and open container carefully. Do not cut water soluble packets when opening. If container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to **PRECAUTIONARY STATEMENTS** on label for hazards associated with the handling of this material. Do not walk through spilled material. Dispose of pesticide as directed above. In spill or leak incidents, keep unauthorized people away.

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 Makhteshim Agan of North America, Inc. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Makhteshim Agan of North America, Inc. 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. No agent of Makhteshim Agan of North America, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Makhteshim Agan of North America, Inc. disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Makhteshim Agan of North America, Inc.'s election, the replacement of product.

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