

Imidacloprid
New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
Bureau of Pesticides Management, Room 498
Pesticide Product Registration Section
50 Wolf Road, Albany, New York 12233-7257
Phone: (518) 457-7446 • FAX: (518) 485-8990
Website: www.dec.state.ny.us/website/dshh/pesticid/pesticid.htm



AUG - 1 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Todd Frank
Bayer Corporation
Agriculture Division
P.O. Box 4913
Kansas City, MO 64120-0013

Dear Mr. Frank:

Re: Registration of Pre-Empt Professional Cockroach Gel Bait (EPA Reg. No. 3125-525), Which Represents a Major Change in Labeling for the Active Ingredient Imidacloprid

The Department of Environmental Conservation (the Department) has reviewed your application, received November 19, 1999, and additional information, received February 1, 2000, to register one new pesticide product, **Pre-Empt Professional Cockroach Gel Bait** (EPA Reg. No. 3125-525) in New York State. The product represents a major change in labeling for the active ingredient imidacloprid.

Pre-Empt Professional Cockroach Gel Bait is labeled for control of cockroaches when applied as a spot and/or crack and crevice application to spaces within structures, their walls and ceilings (both inside and out), and the immediate adjacent grounds. The imidacloprid containing products currently registered in New York State are labeled for outdoor use only. The application was deemed complete on March 7, 2000 and a registration decision is due by August 4, 2000.

The Department has reviewed the information supplied to date in support of the pesticide product registration application for Pre-Empt Professional Cockroach Gel Bait.

The available information on imidacloprid and the formulated product Pre-Empt Professional Cockroach Gel Bait indicates that they were not very acutely toxic in laboratory animal studies. While the Pre-Empt product is labeled for indoor (as well as outdoor) pest control and impacts to indoor air could be of concern, this appears very unlikely because the active ingredient imidacloprid has a low vapor pressure (1.5×10^{-9} millimeters mercury at 20 degrees Celsius) and the Pre-Empt product does not contain other volatile components. In addition, the active ingredient is in a gel matrix, very little is applied and it is not very acutely toxic.

Imidacloprid

New York State Department of Environmental Conservation

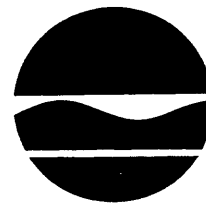
Division of Solid & Hazardous Materials

Bureau of Pesticides & Radiation

Pesticide Product Registration Section

50 Wolf Road, Albany, New York 12233-7257

Phone 518-457-7446 FAX 518-485-8990



Michael D. Zagata
Commissioner

December 10, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Karen Cain
State Regulatory Affairs Specialist
Registrations Department
Bayer Corporation
P.O. Box 4913
Kansas City, MO 64120-0013

Dear Ms. Cain:

Re: **Application for Major Change of Labeling of Imidacloprid, Contained in the Pesticide Product Premise 75 Insecticide (EPA Reg. No. 3125-455)**

The Department received your letter, dated December 4, 1996, requesting the **withdrawal** of the application for **Premise 75 Insecticide (EPA Reg. No. 3125-455)**. Premise 75 Insecticide represents a major change in labeling for the active ingredient imidacloprid.

The Department acknowledges Bayer Corporation's decision to withdraw the application for New York State registration of Premise 75 Insecticide.

The Department has concerns regarding the outdoor termiticide uses of Premise 75 Insecticide. There is a potential of groundwater impacts if the product is used in sandy areas of New York State. After consideration of the reviews by the New York State Department of Health, and our Technical Support & Laboratory Services Section, we recommended that Bayer Corporation consider registration of Premise 75 Insecticide (EPA Reg. No. 3125-455) by a Special Local Need label in New York State limiting use to indoor applications, and application to the interior of foundation walls and under slabs.

Bayer Corporation is not willing to concede the outdoor uses of Premise 75 Insecticide and therefore has requested the withdrawal of the application.

Ms. Karen Cain

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Bayer Corporation understands that the \$300 application fee is forfeited, and that any new submittal of an application for registration of this product will require a complete application and fee.

Please be reminded that any unregistered product may **not** be sold, offered for sale, distributed, or used in New York State.

Please contact Ms. Jeanine Broughel, of my staff, at (518) 457-7446, if you have any questions.

Sincerely,



Maureen P. Serafini
Supervisor
Pesticide Product Registration Section

cc: N. Kim/A. Grey - NYS Department of Health

bcc: A. Columbus
J. Broughel
B. Seeley

Filename: PREMISEW.LET