UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

7946-12

7-20-95

· JUL 2 0 1995

Mr. Lawrence A. Miller Biologic, Inc. 115 Obtuse Hill Brookfield, Connecticut 06804

Subject: Fungisol PV - Revisions to Labeling/Pamphlet EPA Registration No. 7946-12 Your Submission Dated July 19, 1995

The Agency has completed review of the subject submission and found that the product labeling will be acceptable provided you-make the changes outlined below. A label stamped "Accepted with Comments" is enclosed for your records.

- 1. The Directions for Use pamphlet contains reference to the product "Stemix" under "Use Precautions" on page 4, line 4 of the last paragraph. Delete the reference to "Stemix" and revise, as appropriate, to reflect use of Fungisol PV.
- 2. On page 8, the phrase "Inject Only In sound Wood" must be deleted or revised to make a more definitive statement as to "what" is injected and perhaps "why" inject only in sound wood.

Submit five(5) copies of the revised labeling.

If you have any questions regarding this matter, please contact me or Sidney Jackson at (703) 305-7610.

Sincerely yours,

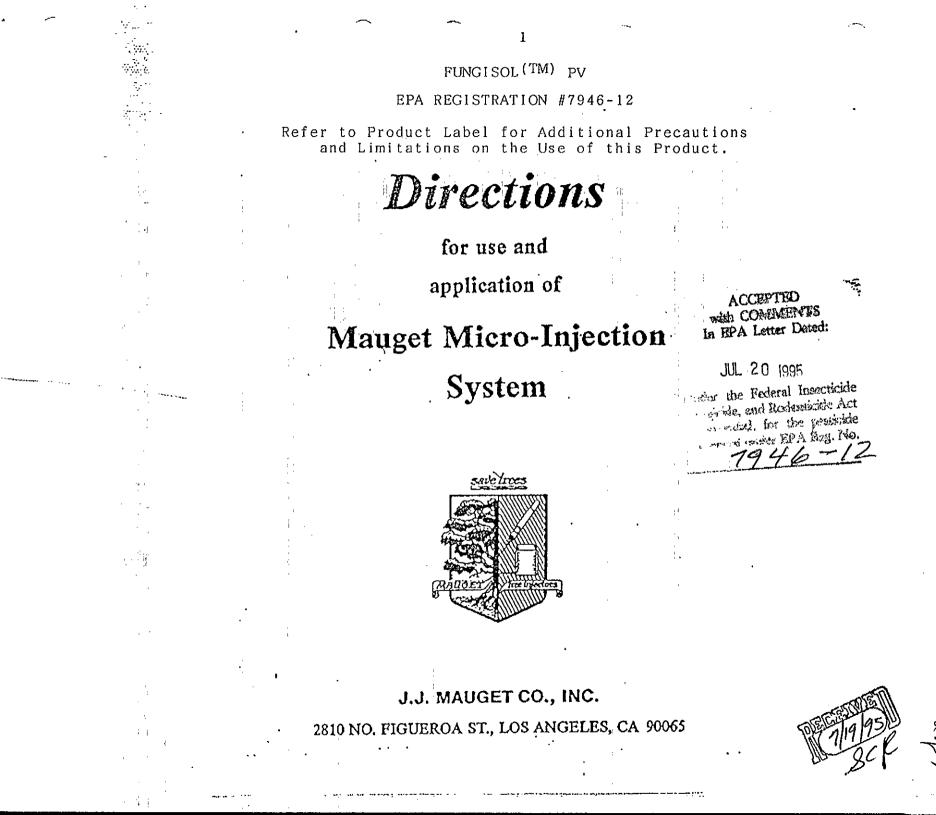
Connie B. Welch Product Manager, Team 21 Fungicide-Herbicide Branch Registration Division (7505C)

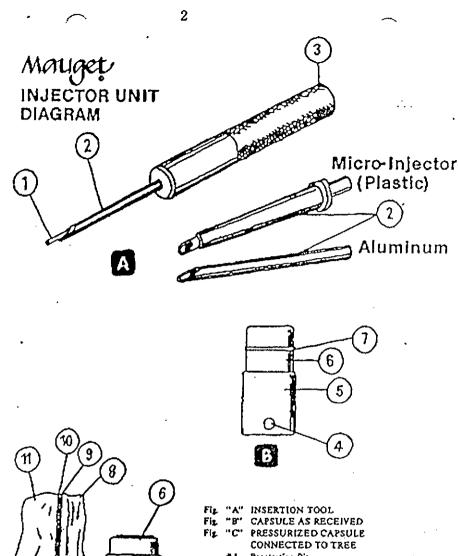
Enclosure

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Symbol 🕨	7505C.							
SURNAME »	S. Jackson							
DATE 🕨	Jul 20, 1995	**************************************	*****************					
PA Form 1320-1 (12-70)				•		OFFICIAL FILE COPY		

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- #1 Prostrating Pin
- #2 Feeder Tube
- #J Driving End of Tool
- #4 Constition Hole in Capsule
- #5- Lower Member of Capaule (double wall)
- #6 Upper Member of Capeale (single wall)
- #7 Final Locking Ring
- #8-9 Burk
- #9-10 Xylem Area (Sapwood)
- #10-11 Heart Wood Area

REAMER (not shown) is used to remove aluminum from the Inserting Tool. Place Reamer and Inserting Tool together with Penetrating Pin inside Reamer. Hold together and rotate to remove any aluminum from seat of Inserting Tool. Directions f Use of MAUGET MICRO-INJECTION COMPONENTS When Using Insertion Tool

Measure DBH (Diameter Breast High) in inches and divide by two or circumference in inches divided by 6 to determine the number of feeder tubes and capsules to use. Transfer placement to root collar (about 4 inches above ground level) on the stimulated root flares or high points. Although not as desireable, placement can be made breast high or higher if circumstances so dictate. If necessary to inject above root collar, placement should be 6 feet or more below major branching. Whenever forking occurs within a few feet above the soil, treat forking limbs as individual trees if you wish placement to be above root collar.

It is extremely important that the feeder tube be set to the proper depth into xylem #9-10. If set too deeply, flow is restricted by blockage in the heart wood; if set to shallow leaks may develop as the fluid may be forced back through the bark. The feeder tubes are bevel cut to allow for a $\frac{1}{2}$ inch plus or minus error.

To Set Feeder Tube into Tree:

Refer to Diagram:

Place feeder tube #2 on penetrating pin #1 of tool and seat with the diagonally cut end of the tube outward. (A)

Hold hammer at right angle to tree bark and strike tool head #3 with a hammer until hard wood #10 is encountered with the tip #1 of the tool penetrating pin. Continue to drive tool approximately $\frac{1}{4} - \frac{1}{4}$ inch past this point. Tool must always be driven in a straight line. After initial entry, do not attempt to use tool to divert direction of tube, as a bent penetrating pin will result.

Remove tool by rotating a few turns to free from the feeder tube and pull straight out. It is important that tube is not disturbed during this extraction as the seal between tube and bark may be destroyed. Disinfect insertion tool before or between additional trees with 1 part household bleach in 12 parts water or spray with Lysol Aerosol. Do not use isopropyl rubbing alcohol.

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Alternate Drilling Method of Setting Feeder Tubes:

With the advent of the cordless rechargeable drill, the insertion tool is often being supplanted by the use of drills with fast (1 hour) rechargeable power packs by either 12 volt or 1 10 volt systems. Using a 11/64" drill bit at 600 - 750 rpm, clean holes are drilled 4" to 4" into the xylem at the root collar (within 4" of ground level). The placement of the feeder tubes is the same as with the insertion tool. The feeder tubes may be inserted into the drilled holes by gently tapping with a plastic or rubber hammer. The use of an insertion tool at this point may insure that the feeder tube is not clogged with cuttings. Usually the act of applying the capsule will place the feeder tube to the desired depth.

To Apply Capsules:

Pressurize capsule "B" by forcing cap #6 downward to engage bottom locking ring #7. Capsule is then connected to preset feeder tube by means of hole #4. Turn capsule upside down and force or tap capsule on tube until the internal seal within the capsule is ruptured "C". Overall distance of capsule on tube should be approximately H" as it is controlled by collar on plastic feeder tube.

Removing Capsule and Feeder Tube:

Allow capsule to remain in place "C" until completely empty. Capsule may be revolved on the feeder tube for visual inspection to determine when empty. Allow capsule to remain in a downward position at least 1 minute prior to removing. This will clear opening #4 of material. Pull feeder tube from trunk with a pair of pliers.

USE PRECAUTIONS:

Do not treat trees that are under stress such as lack of moisture, diseased or suffering from herbicide damage. Trees of less than two (2) inches in diameter should not be injected. Don't inject trees within a two week period of any other treatments to the soil or foliage. Stemix multinutrients may at certain times produce a slight leaf scorching and/or light defoliation. Where this occurs, trees usually recover with a flush of healthy green tissue as the growing period continues.

mauget ® FUNGISOL® PV

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF ON THE SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

STORAGE AND DISPOSAL

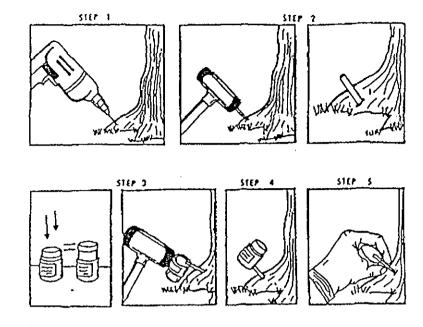
Do not contaminate water, food or feed by storage or disposal of microinjection capsules

STORACE: Store in a cool place over 45" F with units in an upright position.

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

CONTAINER DISPOSAL: Dispose of empty capsules in a sanitary landfill or by incineration i approved by State and Local authorities.

Micro-Injection Procedure With A (2-800 RPM Cordless Dr



Measure DBH (Diameter Breast High) in inches and divide by two to determine the number of capsules to use. Transfer placement to root collar (about 4 inches above ground level) on the stimulated root flares or high points. (See back of Page)

Step 1 Drill with 11/64 inch drill bit 3/8 inch into xylem tissue.

Step 2 Insert aluminum feeder tube into drilled hole with beveled end at 45° angle from horizontal. Tap tube lightly with a rubber or plastic mallet to seat it firmly in hole.

* See instructions for Plastic Micro-Injector.

- Step 3 Place capsule on firm flat surface and compress by pressing with bottom of foot, heel of hand or under some conditions with a plastic or rubber mallet. Turn capsules upside down and align starter hole in capsule with tube. Tap on capsule until inner diaphram seal is broken.
- Step 4 Turn the capsule right side up to allow the liquid contents to flow through the tube into the xylem and phloem tissue in the tree.
- Step 5 Allow time for the tree to absorb all the liquid, then turn the capsule upside down for at least a minute before removal. Dispose of capsules in a manner approved by State and Local authorities.

mauget® FUNGISOL® PV

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate,

PHYSICAL OR CHEMICAL HAZARDS

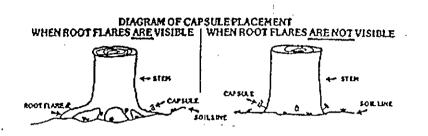
Do not use or store near-heat or open flame.

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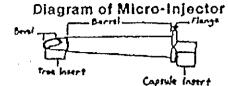
Pl. Jement of Capsules

- 1. Always place capsule on root-buttress at soil line.
- 2. Always place capsule in sound wood.
- 3. When insertion tool is used, set feeder tube $\mathcal{H}'' \mathcal{H}''$ into active conducting wood tissue.
- 4. When drill is used, place feeder tube H" into active conducting wood tissue.



Inject Only In Sound Wood

The improved Mauget Micro-Injector requires subtle differences in techniques than its predecessor the metal feeder tube. The steps below will guide you in the correct use of the Mauget Micro-Injector.



1. Predrill the injection site at a slight downward angle at the root flare using an 11/64" diameter clean, sharp bit to a depth of 3/8" into the vigorous wood (xylem) tissue. On thick bark trees, a 3/16" drill bit may be desireable.

2. Place, by hand, the capsule insert with flange notch upward into a compressed inverted capsule. Push the capsule insert flush with the internal capsule membrane.

3. Then, by hand firmly seat the tree insert portion of the Micro-Injector with the attached inverted capsule into the pro-drilled injection site.

4. Next, with one hand tap the top corner of the capsule directly behind the Micro-Injector with a plastic mallet while steadying the capsule with the other hand. This action will simultaneously seat the Micro-Injector into the tree while releasing the compound from the capsule into the tree.

5. Now turn the capsule upright to allow the contents to enter the tree through the injection site.

7. Next grasp the Micro-Injector at the flange and draw it straight back in one motion out of the injection site. In one step you have removed the MicroInjector and capsule. When using pesticides follow all safety procedures outlined in the label and directions.

8. Dispose of the used capsules and Micro-Injectors in compliance with the laws of the State in which they are being used.

9. Practice only with fertilizers.







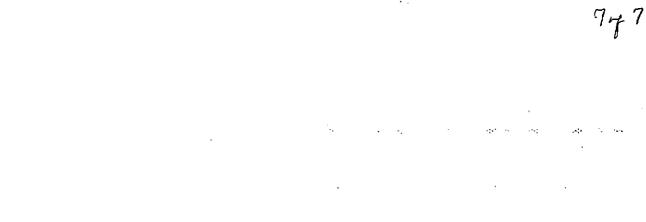






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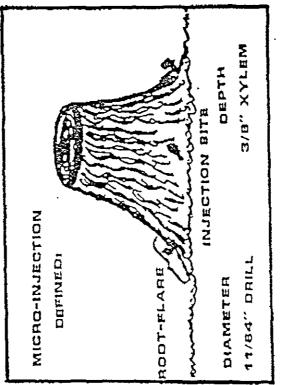
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