

Samantha Bates
Agent for J.J. Mauget Co.
Lewis and Harrison
122 C. Street, N.W., Suite 740
Washington, D.C. 2001

MAR 25 2002

SUBJECT: Imisol
EPA Reg. No. 7946-21
Your Submission Dated February 21, 2002

Dear Ms. Bates:

The labeling referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended is acceptable provided that you make the following labeling change:

1. Under the Precautionary Statements, third line, "waterproof gloves" should be changed to "chemical resistant gloves made of any waterproof material".

Submit one copy of the final printed labeling before releasing the product for shipment. If you have any questions, you may reach me at (703) 308-9354.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505C)

Enclosure: Stamped Label

Mauget IMISOL™

Systemic Insecticide / Fungicide in Ready to Use Capsules
For Tree Injection Use For Seasonal Suppression of Certain
Insects and Diseases of Ornamental Trees

ACTIVE INGREDIENT:

- Debacarb
[2-(2-ethoxyethoxy)ethyl-2-benzimidazole carbamate] 1.7%
- Carbendazim
Methyl 2-benzimidazole carbamate 0.3%
- Imidacloprid
1-[(6-Chloro-3-pyridinyl)methyl -N-nitro-2 imidazolidinimine].. 5.0%
- INERT INGREDIENTS 93.0%
- 100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

	FIRST AID
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. • Call a poison control center or doctor for further treatment advice.
IF ON THE 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.
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 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 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.
HOT LINE NUMBER	
<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 1-800-535-5053 for emergency treatment information.</p>	
NOTE TO PHYSICIAN	
<p>There is no specific antidote available. Treat Patient symptomatically.</p>	

Mfg. By: J.J. Mauget Co.
 Town, State: Arcadia, CA 91006
 EPA Reg. No.: 7946-21
 EPA Est. No.: 7946-CA-1

Net Contents: 25 capsules plus 25 feeder tubes per carton
 _____ 25 capsules @ 4 mL, 100mL net or
 _____ 25 capsules @ 6 mL, 150 mL net
 _____ Shipping box: 12 cartons as above.

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GENERAL DIRECTIONS

Measure the tree at chest height in inches. If measuring the circumference of the tree, divide this number by six (6) to determine the number of capsules needed. If measuring the diameter of the tree, divide this number by two (2) to determine the number of capsules needed. Apply the injector units around the tree at the root flare. Use the following dosage depending upon trunk diameter at breast height (DBH).

- 4 mL - 2 to 10 inches dbh
- 6 mL - 10 inches dbh and above

Consult the enclosed pamphlet "Directions for use and application of Mauget Micro-Injection System" for additional instructions. Applicators shall remove capsules promptly after treatment.

Important: Preventative application is more effective than therapeutic treatment in trees showing disease symptoms. Trees in advanced stages of disease development may not respond to treatment.

Healthy trees under optimum conditions will absorb the full contents promptly. Infected trees will absorb the material more slowly due to the vascular plugging caused by the disease. If Imisol is not absorbed within 24 hours, the tree is considered high risk and has a poor chance of survival.

RESTRICTIONS

Do not inject trees that are less than two inches in diameter. This product is not to be used on trees which will produce food within the year following treatment.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

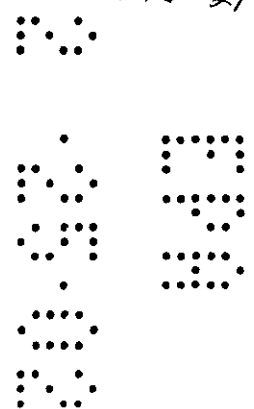
STORAGE: Store in a cool dry place out of the reach of children. Do not store below 45° F. Store capsules in an upright position in closed container. Keep out of direct sunlight when possible.

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

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 25 2002**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.**

7946-21



IMISOL™

Disease Treatment: Make application when disease first appears. Repeat treatment if disease symptoms progress. Do not repeat within 3 months of first application. Some diseases may require repeated yearly application. Preventative Dutch Elm Disease treatments are made 4 weeks after Bark Beetle emerges. Therapeutic treatments are made as soon as possible after flagging branch is observed. **IMISOL** Insecticide/fungicide is for use on ornamental trees for the control of the following insects: Adelgids, Aphids, Black Vine Weevil Larvae, Bronze Birch Borer, Cottonwood Borer, Elm Leaf Beetle, Eucalyptus Longhorned Borer, Flatheaded Borer (including Alder Birch Borer), Japanese Beetle, Lacebugs, Leafhoppers, Leafminers, Mealybugs, Pine Tip Moth Larvae, Psyllids (including Lerp Psyllid), Royal Palm Bugs, Scale Insects, Thrips, Whiteflies. and the following diseases:

USE	DISEASE
Alder	Ceratocystis Canker, Fusarium Wilt, Physalospora (Bleeding Canker)
Arborvitae	Kabatina Branch Canker
Ash	Anthrachnose (Fall application only)
Bay Tree	Fusarium Wilt, Nectria Canker
Birch	Melanconium Dieback
Buckthorn	Nectria (Tubercularie) Canker
Camphor	Verticillium Wilt
Carob	Verticillium Wilt
Catalpa	Verticillium Wilt
Cedar	Coryneum Blight, Diplodia Tip Blight, Phomopsis, Kabatina
Cypress	Cedar Branch Canker
Douglas Fir	Phomopsis Canker
Elm	Cephalosporium Ulmi (Elm Wilt), Ceratocystis Ulmi (Dutch Elm Disease), Cytospora Canker, Fusarium Wilt, Vermicularia Dieback, Verticillium Wilt
Fir	Cytospora Canker
Gum (Sweet)	Ceratocystis Canker
Madrone	Thielaviopsis Decline, Fusarium Wilt
Magnolia	Ceratocystis Canker
Maple	Verticillium Wilt
Mimosa	Fusarium Perniciosum (Mimosa Wilt)
Mulberry (Fruitless)	Ceratocystis Canker
Oak	Oak Wilt (Ceratocystis fagacearum), Anthracnose, Nectria Canker, Oak Decline, (Botryodiplodia, Cephalosporium, Dothiorella, Fusarium, Pestalotia, Verticicladiella, Verticillium)
Olive	Fusarium Wilt, Verticillium Wilt
Palm	Penicillium Vermoeseni (Pink Bud Rot), Atropellis Canker, Ceratocystis Dieback
Pine	Fusarium moniliforme F. Subglutinans (Pine Pitch Canker), Leptographium Canker
Pistachio(Non-Crop)	Verticillium Wilt
Poplar	Cytospora Canker
Redwood (Coast and Sierra)	Botryosphaeria Branch Canker, Coryneum Canker
Spruce	Cytospora Canker
Sycamore	Anthrachnose (Spring application only), Ceratocystis Canker
Walnut (Black Non-Crop)	Melanconium Dieback
Willow	Cytospora Canker

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Causes eye irritation. Applicator must wear water proof gloves and face shield when applying this product. Wash thoroughly with soap and water after handling. Avoid breathing vapors. Remove contaminated clothing and wash before reuse.

Personal Protective Equipment:
Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selection chart.

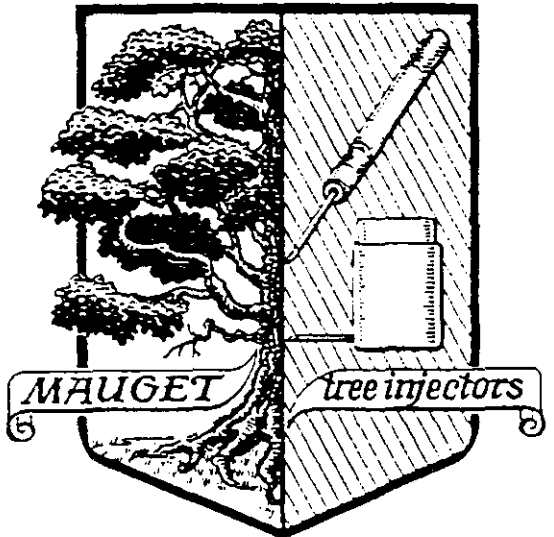
- Applicators and other handlers must wear:**
- Long-sleeved shirt and long pants
 - Shoes plus socks
 - Chemical resistant gloves, such as polyethylene or butyl rubber or neoprene rubber or viton
 - Protective eyewear

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. 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.



NOTICE OF WARRANTY

Mauget Co. makes no warranty of merchantability, fitness for any purpose or otherwise expressed or implied concerning this product or its uses which extend beyond the use of the product under normal conditions in accord with the statements made on this label.

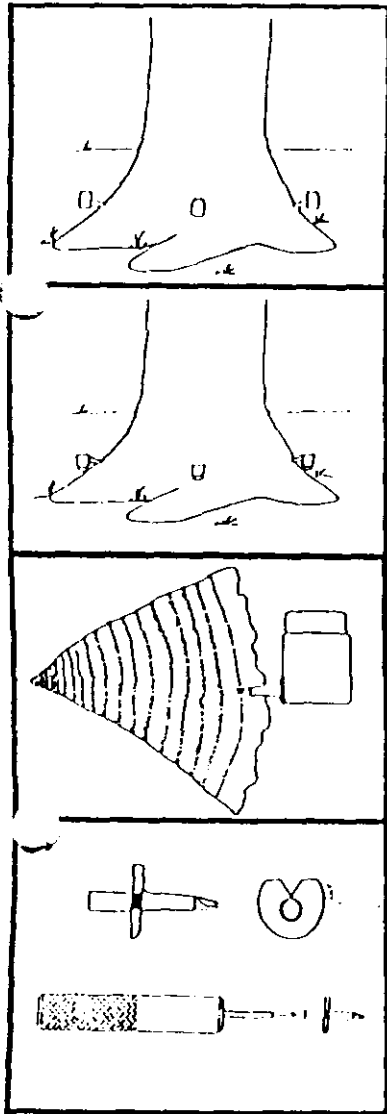
DIRECTIONS FOR USE

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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and 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). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.



9. CAPSULE POSITION

Turn the capsule right side up to allow the material to flow through the tube into the xylem and phloem tissue in the tree.

10. REMOVAL & DISPOSAL

Allow time for the tree to absorb all the liquid material. Turn the capsule upside down for a minute before removal. Applicators shall remove capsules promptly after treatment. Follow instructions on product label for capsule disposal.

11. MICRO MINI-FEEDER TUBE

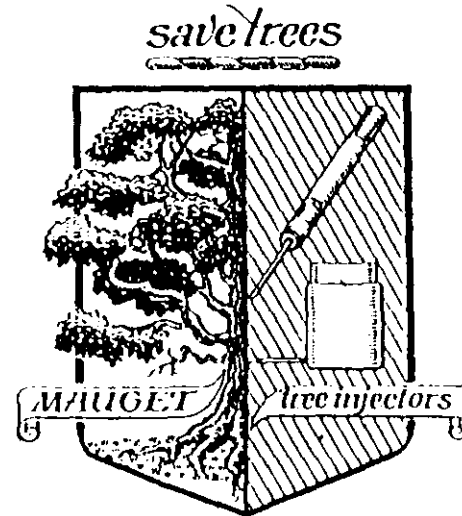
For established trees with thin bark (less than 3/8" thickness). Use a 7/64" drill bit to produce a micro-injection site.

12. MICRO MINI-INSERTION TOOL

Because the 7/64" micro injection site is so small, it is recommended that the Micro mini insertion tool (116-NAM) be used to prevent plugging of the feeder tube & insure a clear pathway to the cambium tissue. Be sure to place the tube with the notch up.

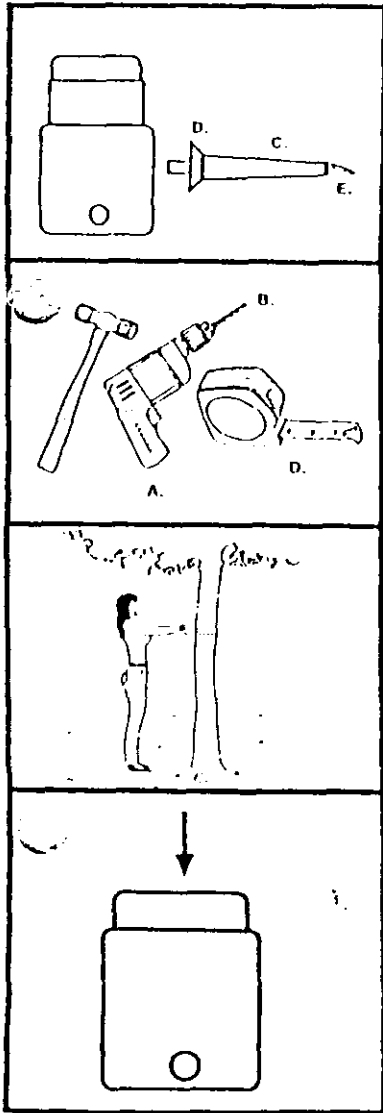
DIRECTIONS
for use and application of
Mauget

Micro-Injection system



REFER TO PRODUCT LABEL FOR ADDITIONAL
PRECAUTIONS AND LIMITATIONS ON THE
USE OF THIS PRODUCT

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1. WHAT'S THE SYSTEM?

- A)...The Maugel two piece capsule.
- B)...Insert hole.
- C)...Feeder tube.
- D)...Flanged gun-site end.
- E)...Tapered beveled end.

2. WHAT TOOLS ARE NEEDED?

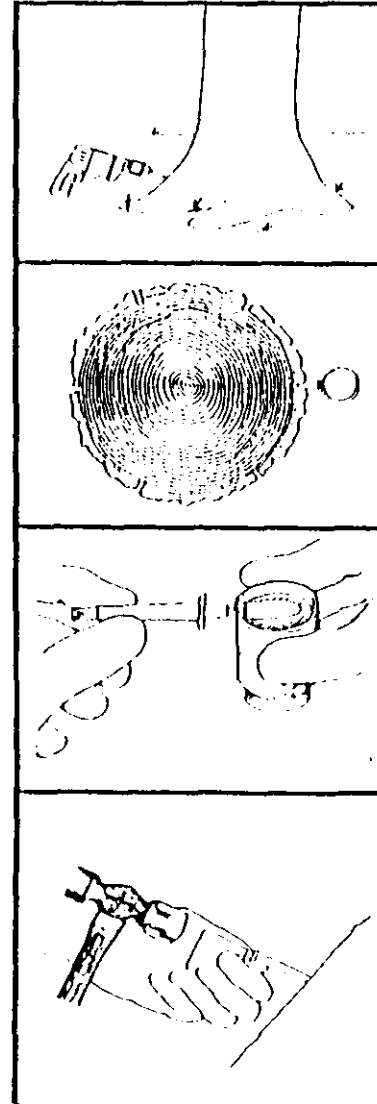
- A)... Electric Drill
- B)... 11/64" Drill bit.
- C)... Plastic Mallet (Hammer)
- D)... Tape Measure
- E)... Consult product label for specific Personal Protective Equipment (PPE) required.

3. HOW MANY CAPSULES?

Measure the tree at chest height. If measuring the circumference, divide this number by 6 (six) to determine the number of capsules needed. If measuring the diameter, divide this number by two (2) to determine the number of capsules needed.

4. PRESSURIZING CAPSULE

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.



5. HOW DO I DRILL?

Pre-Drill the injection site at a slight downward angle at the root flare (approximately 6" above ground level) using a clean 11/64" drill bit. Drill to a depth of 3/8" (into the healthy xylem tissue). For the Micro-mini feeder tube, see #'s 11 & 12. Disinfect drill bit and Micro mini-insertion tool prior to use on each tree.

6. HOW DEEP?

It is important that the feeder tube be set to the proper depth into the xylem. If set too deeply, flow is restricted by blockage in the heartwood; if set too shallow, leaks may occur. The feeder tubes are "beveled" cut to allow for 1/4" +/- error.

7. COMBINING CAPSULE & TUBE

Place by hand, the feeder tube's flange end with flange notch upwards into a compressed inverted capsule. Push the end of the tube flush with the internal capsule seal.

8. PLACING UNIT IN TREE

Firmly seat the beveled end of feeder tube with the attached inverted capsule into the pre-drilled injection hole. Tap the top corner of the capsule directly behind the feeder tube with a plastic mallet while supporting the capsule with the other hand. This action will simultaneously seat the feeder tube into the tree while breaking the capsule seal and releasing the material into the tree.

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