

PM-01

Reg # 62719-157

8/15/97

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

AUG 15 1997

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Steve A. McMaster
Regulatory Manager
DowElanco
9330 Zionsville Road
Indianapolis, IN 46268

Subject: Review of Labeling Amendment
Cutless™ TP
EPA Reg. No. 62719-157
Your Letter Dated April 30, 1997

Dear Mr. McMaster:

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

Delete the Spanish precautionary statement under CAUTION PRECAUCION and replace with the following Spanish statement and English translation: "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.)"

Please submit one (1) copy of your final printed labeling before you release the product for shipment. A stamped label is enclosed for your records. If you have any questions, then please contact Terri Stowe of our staff at (703) 305-6117.

Sincerely,

John B. Bayliss, Jr.

For

Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

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ACCEPTED
with COMMENTS
In EPA Letter Dated

AUG 15 1997

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

62719-157

(Base label):

(logo) DowElanco

Cutless* TP

Cutless TP is a trunk injected plant growth regulator for the reduction of growth and pruning frequency of ornamental trees.

Active ingredient:

flurprimidol: a-(1-methylethyl)-a-
[trifluoromethoxy]phenyl]-5-
pyrimidinemethanol.....99.0%-99.3%

Inert Ingredients1.0%-0.7%

Total100.0%

When Cutless TP is diluted to 1 gallon with alcohol, the resulting solution contains 227.1 grams active ingredient per gallon (60 grams per liter).

Keep Out of Reach of Children

CAUTION PRECAUCION

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

Precautionary Statements

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children

CAUTION

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

Harmful If Swallowed, Inhaled Or Absorbed Through The Skin • Causes Eye Irritation

Avoid breathing dust or spray mist and contact with eyes, skin, or clothing. Use eye protection and protective clothing such as coveralls, a long-sleeved shirt, and impermeable gloves when handling this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

First Aid

If swallowed: Do not induce vomiting. Call a physician or Poison Control Center. If available, administer activated charcoal (6-8 heaping teaspoonfuls) with a large quantity of water. Do not give anything by mouth to an unconscious person. Immediately transport to a medical care facility and see a physician.

If in eyes: Flush eyes with plenty of water. Call a physician if irritation develops.

If on skin: Wash with plenty of soap and water. Get medical attention if irritation develops.

If inhaled: Remove individual to fresh air. If breathing difficulty occurs, get medical attention. If not breathing, provide cardiopulmonary resuscitation assistance (mouth-to-mouth) and get medical attention.

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Environmental Hazards

~~For terrestrial uses, do not apply directly to any body of 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 cleaning equipment or disposing of equipment washwaters.~~

~~Refer to label booklet for additional precautionary information and Directions for Use.~~

Notice: Read the entire label. Use only according to label directions. **Before buying or using this product, read "Warranty Disclaimer" and "Limitation of Remedies" inside label booklet.**

In case of emergency endangering health or the environment involving this product, call collect 517-636-4400.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-157.

EPA Est. 5905-AR-01

*Trademark of DowElanco
DowElanco • Indianapolis, IN 46268 U.S.A.

Specialty Growth Regulator

Net Contents XXX

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(Datapack cover):

(logo) DowElanco

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Specialty Growth Regulator

Net Contents XXX

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(Page 1 through end):

Precautionary Statements

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Environmental Hazards

~~For terrestrial use, do not apply directly to any body of 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 cleaning equipment or disposing of equipment washwaters.~~

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

Not for use on plants grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.

Storage and Disposal

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

Storage: Store in original container only. Do not store after dilution with alcohol. In case of leak or spill, contain material and dispose as waste.

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

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

General Information

Cutless* TP plant growth regulator suppresses terminal growth of ornamental trees. Growth suppression is achieved by inhibition of gibberellin biosynthesis resulting in reduced internode elongation in terminal shoot growth. Smaller leaves and intensified greening occur in some species. Trunk injected treatments are translocated through the xylem to growing leaves and stems and provide long-term growth suppression without affecting other development and reproductive processes.

Cutless TP suppresses growth in a broad range of ornamental tree species. Cutless TP may be injected into trees with actively transpiring leaves. Conditions favoring rapid transpiration reduce the time required for tree injection. Where pruning is required, best results will be achieved when application is made prior to or in conjunction with pruning. Growth suppression may not be evident until the year following treatment. Repeat application can be made after growth regulator effects start to decline.

Use Precautions

Cutless TP should not be applied to trees under the following conditions:

- Trees that appear to be unhealthy or diseased
- Sugar maple trees or any other trees that may be tapped for sugar
- Fruit or nut trees that may be harvested within one year after application

Mixing Directions

Fill the one gallon container containing Cutless TP to approximately 3/4 full with isopropanol (containing no more than 9% water). Replace the lid and shake for approximately one minute to help dissolve the compound. Allow the container to stand for about five minutes and then fill to one gallon with additional alcohol. Mix the solution again for one minute and check to make sure the compound is completely dissolved. Make solution only as required. Do not store after dilution with alcohol.

Tree Injection Techniques

Cutless TP should be injected in a manner which results in even distribution throughout the tree. Specialized tree trunk injection equipment should be used which will meter the appropriate amount of Cutless TP solution into the injection sites. The number of injection holes needed per tree should be determined by measuring the tree diameter at the injection height. Injection holes should be uniformly spaced around the tree trunk just above the root flare. Injection holes should be spaced no greater than 8 inches apart. Since xylem arrangement in trees can affect distribution of Cutless TP, the professional user may determine that a more narrow injector spacing is required to achieve uniform growth suppression in certain tree species.

Drill injection holes horizontally into the tree trunk at a 45 to 60-degree angle to the surface plane of the trunk to intercept the outer sapwood. Avoid knots, wounds and areas of compression wood. Bleeding of materials from injection holes can be minimized if holes are drilled with a slight downward slope. Injection holes should be 2 1/2 to 3 inches in depth and drill diameter should allow for tight injector fit without leakage during injection. Use sufficient injection pressure to facilitate rapid uptake. Holes may be plugged after treatment.

Application Rates for Cutless TP Solution¹

Cutless TP solution, when mixed as directed, contains 60 grams of active ingredient per liter (1 gram of active ingredient per 16.7 ml of solution).

Use the table below to determine the amount of Cutless TP solution to be injected per hole for four (4) inch, six (6) inch or eight (8) inch injector spacings. An application rate of 0.75 to 1.0 grams active ingredient per inch of tree diameter (at injection height) is required to produce acceptable growth suppression in most trees. When the tree crown has been severely reduced in size due to pruning, a rate of 0.5 grams active ingredient per inch of tree diameter may be used for optimum growth suppression. Up to 1.5 grams active ingredient per inch of tree diameter may be used to suppress certain species such as melaleuca.

Application Rate (Grams per Inch of Tree Diameter)	4-inch Hole Spacing (ml per hole)	6-inch Hole Spacing (ml per hole)	8-inch Hole Spacing (ml per hole)
0.50	11	16	21
0.75	16	24	32
1.00	21	32	42
1.50	32	48	64

¹ If trees smaller than 6 inches in diameter require injection, use at least three injection holes equally spaced around the trunk. For the rate desired, use the injection volume that most closely corresponds to the spacing of the drilled holes. For example, if the drilled holes are about four (4) inches apart, use the injection volume corresponding to the desired rate and a 4-inch spacing. For a 3-inch spacing, use one-half the injection volume for a 6-inch spacing, etc.

Ornamental Tree Species

Cutless TP exhibits broad spectrum growth regulator activity on ornamental trees. Growth regulator activity from tree injection application has been demonstrated in ornamental tree species listed below. For ornamental tree species not listed, a starting rate of 0.75 gram of active ingredient per inch of diameter is recommended to reduce the chance of over regulation.

Precaution: Cutless TP is not recommended for application on conifers (e.g., pine, spruce, fir or juniper).

Common Name	Scientific Name
Alder, red	<i>Alnus rubra</i>
Ash	<i>Fraxinus</i> spp.
Aspen	<i>Populus tremuloides</i>
Blackolive	<i>Bucida buceras</i>
Black cherry	<i>Prunus serotina</i>
Black locust	<i>Robinia pseudoacacia</i>
Black walnut	<i>Juglans nigra</i>
Boxelder	<i>Acer negundo</i>
Cottonwood	<i>Populus deltoides</i>
Dogwood	<i>Cornus florida</i>
Elm, American	<i>Ulmus americana</i>
Elm, Chinese	<i>Ulmus parvifolia</i>
Elm, Siberian	<i>Ulmus pumila</i>
Elm, winged	<i>Ulmus alata</i>
Blue Gum Eucalyptus	<i>Eucalyptus globulus</i>
Hackberry	<i>Celtis</i> spp.
Maple, Norway	<i>Acer platanoides</i>
Maple, red	<i>Acer rubrum</i>
Maple, silver	<i>Acer saccharinum</i>
Maple, sugar	<i>Acer saccharum</i>
(Not tapped for sugar)	
Melaleuca	<i>Melaleuca</i> <i>quinquenervia</i>
Oak, laurel	<i>Quercus laurifolia</i>

Oak, live	<i>Quercus virginiana</i>
Oak, pin	<i>Quercus palustris</i>
Oak, post	<i>Quercus stellata</i>
Oak, red	<i>Quercus rubra</i>
Oak, southern red	<i>Quercus falcata</i>
Oak, water	<i>Quercus nigra</i>
Oak, willow	<i>Quercus phellos</i>
Pine, Australian	<i>Casuarina equisetifolia</i>
Sugarberry	<i>Celtis laevigata</i>
Sweetgum	<i>Liquidambar styraciflua</i>
Sycamore	<i>Platanus occidentalis</i>
Tallowtree, Chinese	<i>Sapium sebiferum</i>
Willow, black	<i>Salix nigra</i>

Warranty Disclaimer

DowElanco warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. DowElanco MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Crop injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of DowElanco or the seller. All such risks shall be assumed by buyer.

Limitation of Remedies

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at DowElanco's election, one of the following:

- (1) Refund of purchase price paid by buyer or user for product bought, or
- (2) Replacement of amount of product used.

DowElanco shall not be liable for losses or damages resulting from handling or use of this product unless DowElanco is promptly notified of such loss or damage in writing. In no case shall DowElanco be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of DowElanco or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

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EPA-Approved: ___/___/___