

	United States	<input type="checkbox"/> Registration	OPP Identifier Number
	Environmental Protection Agency	<input type="checkbox"/> Amendment	
	Washington, DC 20460	<input checked="" type="checkbox"/> Other	

Application for Pesticide - Section I

1. Company/Product Number 64014-3	2. EPA Product Manager Cynthia Giles-Parker	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Systrex/Nutrient	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) Florida Silvics Inc., dba Tree Tech Microinjection Systems, 950 S. E. 215th Avenue, Morriston, FL 32668 <input checked="" 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 _____	NOTIFICATION JAN 14 2003
<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.)

Notification of addition of additional tree diseases to existing label per PR Notice 98-10. Dosage, frequency, concentration and method of application HAVE NOT changed. Trees cited do not produce fruit or nuts for consumption. Efficacy data available, copy of new label is supplied. 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.

Section - III

1. Material This Product Will Be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" 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 checked="" type="checkbox"/> Container		4. Size(s) Retail Container 14 mL		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued 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 Roger Webb, PhD	Title President, Tree Tech	Telephone No. (Include Area Code) 1-800 622 2831
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 	3. Title President, Tree Tech	
4. Typed Name Roger Webb	5. Date December 2, 2002	

2 8 4



Tree Tech[®] microinjection systems

December 2, 2002

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Attention: Ms Cynthia Giles-Parker, PM 22

Dear Ms Giles-Parker:

The following information is submitted on behalf of:

Florida Silvics, dba Tree Tech Microinjection Systems
950 S.E. 215th Avenue
Morrison, FL 32688

I am submitting a Notification for a minor change in the label of an existing EPA registered product as per PR Notice 98-10. Additional tree diseases have been added to the label. No other modifications have been made to the label. The tree diseases that have been added do not produce fruit or nuts for consumption.

Product name and registration number
SYSTREX/NUTRIENT, Reg. No. 64014-3

The transmission package consists of:


Form 8570-1: Application for Pesticide: Appropriate boxes marked to indicate that this is a notification as per PR Notice 98-10.

A copy of the new label. The additional tree diseases are underlined.

A stamped, self-addressed postcard has been included as a means of notifying me of acceptance of the notification.

If there are any questions with respect to this Notification, please contact me, Roger Webb, at 800 622 2831.

Sincerely,


Roger S. Webb, PhD
President

3 8 4

SYSTREX[®] /NUTRIENT

A Systemic Fungicide/Micronutrient
Solution Administered by the
Tree Tech Microinjection System

NOTIFICATION

JAN 14 2003

For The Treatment of Tree Decline

Contains BAYLETON SYSTEMIC FUNGICIDE

*An Injection System Utilizing a Systemic Fungicide
for the Suppression of Fusarium spp. and the*

*✓ Control of other Plant Diseases such as Anthracnose, Dutch Elm
✓ Disease, Oak Wilt, Rust, Powdery Mildew, Leaf Blight/Spot and Tip
Blight which Attack Forest, Ornamental, Non-Crop-Bearing and
Christmas Trees which display Decline Symptoms.*

ACTIVE INGREDIENT:

1-(4-Chlorophenoxy)-3,3-(dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone . . . 0.88%
INERT INGREDIENTS 99.12%
TOTAL 100.00%

U.S. Patent No. 3,912.752; Bayleton is a Reg. TM of Bayer AG. Germany

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENTS OF PRACTICAL TREATMENT

In case of poisoning call a physician or poison control center. Have the patient lie down and keep quiet. **IF IN EYES:** Flush eyes with plenty of water. Call a physician if irritation persists. **IF ON SKIN:** Remove contaminated clothing and immediately wash affected area with soap and warm water. If irritation occurs get medical attention. **IF INHALED:** Remove to fresh air. If not breathing give artificial respiration, preferably mouth to mouth. Get medical attention. **IF SWALLOWED:** Call a physician or poison control center immediately. Induce vomiting by giving victim 1 or 2 glasses of water and touching back of throat with finger: Repeat until vomit fluid is clear: Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

See Side/Back Panel for Additional Precautionary Statements

EPA REG. NO. 64014-3

EPA EST NO. 64014-FL-001

NET CONTENTS: Each injection unit contains 0.0012 ounce by weight or 8 mL of 0.88% a.i. triadimefon systemic fungicide (SYSTREX /NUTRIENT) in 6 mL of a readily absorbed water soluble, chelated plant food base which contains nitrogen, phosphorous, potash, iron and zinc.
100 microinjection units per case.

TREE TECH MICROINJECTION SYSTEMS

*a Division of Florida Silvics, Inc.
960 S.E. 215th Ave.
Morrison, FL 32688 U.S.A.*

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

Personal Protective Equipment (PPE):

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

Applicators and other handlers when installing or removing this product must wear:

- Long-sleeved shirt and long pants
- Chemical resistant gloves, such as barrier laminate, or butyl rubber, or polyvinyl chloride
- Shoes plus socks
- Protective eye wear

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

**USER SAFETY
RECOMMENDATIONS**

Users should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 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. 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.

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

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Harmful if inhaled. Avoid breathing vapors. Protective eyewear and rubber or neoprene gloves must be worn while handling or installing injectors to prevent accidental contact with the eyes or skin. This product may cause allergic skin reactions. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash separately from household items before reuse.

ENVIRONMENTAL HAZARDS

Do not use on crops grown for food or forage. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high watermark. Do not contaminate water when disposing of equipment wash-waters.

AVISO

PRECAUCION AL USUARIO: Si Usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Use only as directed for tree injection

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard, 40 CFR 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 Workers Protection Standard (WPS).

STORAGE AND DISPOSAL

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

STORAGE: Store product units in its original container in a cool, dry, locked place out of reach of children.

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

MICROINJECTION UNIT CONTAINER DISPOSAL: Do not reuse microinjection Units. Used microinjection units should be placed in the heavy-duty plastic bag which accompanies each case of microinjection units. The bag must be properly sealed, placed into the original shipping carton and returned freight prepaid for disposal to Tree Tech Microinjection Systems, 1879 S.W. 18th Ave., Williston, FL 32606.

GENERAL INFORMATION

Valuable ornamental trees on golf courses, parks, and other urban recreational areas often decline in growth due to physiological changes induced by Fusarium spp., Rusts, Powdery Mildew, Leaf and Tip Blight and by nutrient deficiency. This decline can be successfully treated and many trees can be saved by initiating a cultural/chemical program to revitalize the trees.

SYSTREX/NUTRIENT has in most cases, been used successfully to suppress symptoms of decline, i.e. premature leaf or needle shedding, foliar yellowing, and branch or twig dieback. Due to the inherent difficulty of diagnosing the extent of biotic and abiotic injury incurred and expressed by declining trees, the responsibility of selecting trees for treatment is solely that of the buyer. The buyer accepts liability and responsibility for the failure of treated trees to exhibit suppression of decline symptoms. Successful foliar response to microinjection treatments has been associated with treatment applied annually for at least two years.

SYSTREX/NUTRIENT can be used as a very important segment of a program to revitalize these weakened trees. It is a ready-to-use fungicidal/fertilizer injection for the treatment of trees in early to mid stages of decline. It contains a liquid fertilizer N-P-K with chelated iron and zinc for immediate plant uptake and triadimefon systemic fungicide for control of Fusarium spp. which commonly attack weakened trees. Irrigate trees during treatment.

HOW TO INSTALL MICROINJECTION UNITS

Use one 14 mL SYSTREX/NUTRIENT microinjection unit for each 3 inches of tree trunk circumference, (equivalent to 1.3 mL of a.i. BAYLETON 009 per 1 inch of trunk circumference). Place microinjection units evenly around the circumference of the trunk 1/2 to 1 foot from the base of the tree since this area of the tree consistently is more receptive to the uptake of liquid treatment. Microinjection units may also be installed on root flares. In addition to the systemic fungicide, SYSTREX /NUTRIENT contains a chelated, water soluble liquid fertilizer solution to assist the tree in nutrient recovery. Application on pines should be made from mid-November to mid-March in Florida. In other areas, applications should be made when sap or resin flow would not impede the injection and uptake of SYSTREX/NUTRIENT.

OBSERVE THESE 7 STEPS WHEN INSTALLING AND REMOVING THE TREE TECH MICROINJECTION SYSTEM

1. Determine the number of microinjection units to be installed based on trunk/stem circumference at 6-to-12 inches above the soil surface. Heavy thick or loose outer bark may be carefully shaved to form a smoother injection point and to assure the operator that the drill hole penetrates through the bark to the xylem tissue.

2. Using a portable electric drill (600-800 rpm range) with a sharp, clean 11/64 inch (0.4cm) bit, the installer should drill a hole at each 3-inch marked spacing to a depth of 1/4 to 1/2 inch (0.6 to 1.3 cm) through the bark into the wood (xylem). A slight downwardly drilling angle is recommended for more complete drainage of the Tree Tech microinjection unit. Disinfect the drill bit between trees with a 20% solution of household bleach. Rinse bit with clean water.

3. After reaching the proper depth range, the drill bit should be withdrawn carefully to avoid dislodging bark fragments around the exterior opening of the hole. The microinjection unit is inserted into the hole. The microinjection unit should be inserted into the hole and the rear barrel portion partially compressed without engaging the locking mechanism and barrel segments. Placing the plastic installation cap over the plunger end, strike the cap with a plastic hammer to seat the microinjection unit firmly in the hole. If the microinjection unit is not properly

positioned in the-hole, strike the cap again until correctly seated. By striking the microinjection unit, the back end of the feeder tip is forced back into the funnel-shaped section dislodging a septum which allows the solution to flow from the microinjection unit into the tree. When the microinjection unit is positioned correctly in the tree and the internal septum is dislodged, remove the cap and, if necessary, push the rear barrel portion of the unit further downwardly until it is flush with the edge of the locking mechanism. This pressurizes the microinjection unit and assists in the evacuation of SYSTREX/NUTRIENT into the vascular system of the tree.

4. Each hole should be drilled and a microinjection unit installed without delay. After the microinjection unit is properly seated, it should be activated. This sequence minimizes the flow of tree sap or resin into the hole prior to SYSTREX/NUTRIENT microinjection.

5. When properly installed, the microinjection unit generates internal pressure resulting in the flow of SYSTREX/NUTRIENT solution through the dispenser tube. The microinjection unit must never be activated unless installed correctly and securely in the tree to be treated.

6. Microinjection units containing SYSTREX/NUTRIENT may require up to several minutes or more to empty depending on the health of the treated tree and local weather conditions. Never assume that microinjection units have depressurized completely because they appear nearly empty or empty. When removing injectors, individuals must wear proper eye protection and rubber or neoprene gloves. The individual should then cover the microinjection unit with one hand near the point of insertion into the stem while grasping the barrel end of the microinjection unit with the other hand. The microinjection unit should be turned slightly as it is slowly withdrawn from the tree.

7. After the microinjection units are removed from treated trees they must be discarded into the heavy-duty plastic disposal bag included in each case of injector units. The bag should be properly sealed and placed in the original carton. Sealed cartons should be returned freight prepaid to Tree Tech Microinjection Systems, 950 S.E. 215th Ave., Morriston, FL 32668.

SYSTREX/NUTRIENT CONTROLS DISEASES THAT ATTACK FOREST AND ORNAMENTAL TREES

Following is a partial list of common forest and ornamental trees and shrubs which may be attacked by the diseases as listed below. The plant disease is referenced below by the number(s) appearing in parentheses after the plant name.

SHADE TREES

- ✓ Ash (2,5)
- Aspen (1,2)
- Birch (1,2)
- Buckeye (2)
- Chestnut (2)
- ✓ Cottonwood (1,2)
- ✓ Elm (2,6)
- Fir (1)
- Locust (2)
- ✓ Maple (2,5)
- ✓ Oak (2,5,6)

FLOWERS FOLIAGE AND WOODY SHRUBS

- Amelanchier (1)
- ✓ Crabapple (flowering) (1,2,3)
- Crape myrtle (2)
- ✓ Dogwood (2,5)
- Euonymus (2)
- Hawthorn (1,2)
- Hemlock (1)
- Holly (2)
- Juniper (1)
- Lilac (2)
- Mock orange (1,2)

- Pine (1,4)
- Poplar (1,2)
- Russian olive (1,3)
- ✓ Sycamore (2,5)
- Walnut (2)
- Willow (1,2)
- Pear (flowering) (2)
- Rose (2)
- Viburnum (1,2)

As the Directions For Use are Closely Followed SYSTREX/NUTRIENT will control the following list of diseases which may attack the above ornamental trees and shrubs.

- (1) Rust
 - Coleosporium spp.
 - Cronartium spp. (fusiform)
 - Gymnosporangium spp.
 - Melampsora spp.
 - Melampsorioidium spp.
 - Peridermium spp. (Gall)
 - Phragmidium spp.
 - Puccinia spp.
 - Uromyces spp.
 - Uredinopsis mirabilis
- (2) Powdery Mildew
 - Erysiphe spp.
 - Microsphaera spp.
 - Oidium spp.
 - Podosphaera spp.
 - Phylactinia spp.
 - Sphaerotheca spp.
 - Uncinula spp.

- (3) Leaf Blight/Spot
 - Cercospora spp.

- (4) Tip Blight
 - Sirococcus strobilinus

- ✓ (5) Anthracnose
 - ✓ Gnomonia spp

- ✓ (6) Vascular Wilt
 - ✓ Ceratocystis spp
 - ✓ Ophiostoma spp.

FERTILIZER GUARANTEED ANALYSIS

Nitrogen (N)	0.35%
Phosphoric Acid (P ₂ O ₅)	0.70%
Potassium (K ₂ O)	0.35%
Iron as Fe	1.00%
Zinc as Zn	1.00%

Derived from urea, ammoniated and potassium phosphates, iron sulfate, zinc sulfate, and an EDTA chelating agent.

CONDITIONS OF SALE: The directions on this label were determined through research to be the directions for correct use of this product. This product has been tested for a range of weather conditions similar to those weather conditions that are ordinary and customary in the geographic areas where the product is used. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather, or may cause injury to other crops, animals, or man, or the environment. Tree Tech Microinjection Systems offers and the buyer accepts and uses this product subject to the conditions that extraordinary or unusual weather, or failure to follow label directions are beyond the control of Tree Tech Microinjection Systems, and are, therefore the responsibility of the buyer.