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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Roger S. Webb, PhD.  
Tree Tech® Microinjection Systems  
950 SE 215<sup>th</sup> Avenue  
Morrison, FL 32668

DEC 17 2007

Subject: Tree Tech OTC-CA  
EPA Reg. No. 64014-11  
EPA Decision Number 372138  
Your Submission of 10/20/06

Dear Dr. Webb:

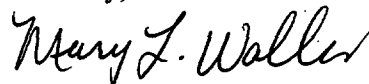
The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided the following changes are made:

1. Page 1, Spanish statement - Revise the Spanish statement to read as follows: "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.)".
2. Page 1, Pesticide Name - The primary brand name is Tree Tech OTC-Ca. If you wish to change the primary brand name of this product, you may submit a notification requesting such a change. All future amendments must use the primary brand name on record with the Agency.
3. Page 1, General Description - The list of diseases on the last approved label (11/10/97) included Elm Yellows. When you resubmit an acceptable proposed label, make sure that the transmittal letter either confirms your intention to exclude Elm Yellows from the proposed label or includes Elm Yellows in the list of controlled diseases.
4. Page 1, Net Contents: Delete the phrase "per microinjection unit" at the end of the sentence, it is redundant.
5. Page 2, User Safety Requirements - Change "Wash thoroughly with soap ..." to "Wash hands thoroughly with soap ..."
6. Page 2, Precautionary Labeling - Replace "May cause allergic reactions with "Prolonged or frequently repeated exposure may cause allergic reactions in some individuals.
7. Page 2, Agricultural Use Box - Move the section that reads "Do not apply ... area during application" to a position just after the "violation of Federal Law" statement following "Directions For Use."

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8. Page 2, General Directions, Section 1 – Change “Protective eye wear and rubber or neoprene gloves ...” to “Protective eye wear and chemical resistant gloves (such as rubber or neoprene ...”
  9. Page 2, General Directions, Section 3 – Change “... proper eye protection and rubber or neoprene gloves ... to “... proper eye protection and chemical resistant gloves (such as rubber or neoprene) ...” In the sections that read “The individual should then cover ...” and “The microinjection unit should then be ...” change the word “should” to “must.”
  10. Page 3, General Directions, Section 4 – Change “The bag should be properly sealed ...” to “The bag must be properly sealed ...”
  11. Page 3, Installing Microinjection Units, Sections 1 and 2 – Use the term “trunk” instead of “stem”.
  12. Pages 3 and 4, Host Table – For clarity, put the word “None” in the empty cells for Crop-bearing trees.
  13. Pages 3 and 4, Host Table – Include the column headings on the right-hand side of the table. For clarity, indent the second word of crops that require a second line, such as Mandarin orange, Flowering quince, and so on.
  14. On page 4, move the sentence “Do not apply this product through any type of irrigation system.” in the Storage and Disposal section so that it appears in the General Information section above.
  15. On page 4, in the Storage and Disposal section, move the fourth sentence under the heading so that it appears below the subheading “Pesticide Storage”.
  16. On page 4, revise the first two paragraphs in the Microinjection Unit Container Disposal section as follows: CONTAINER DISPOSAL: Triple rinse (or equivalent). Then dispose of in a sanitary landfill or by other approved state and local procedures.”
  17. Page 4, Warranty and Disclaimer – Change “To the fullest extent permitted by law ...” to “To the extent permitted by applicable law ...” Change “Buyer assumes all risk ...” to “To the extent permitted by applicable law, buyer assumes all risk ...”.

A copy of the stamped accepted label is enclosed. Submit one copy of the final printed label before the product is released 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 (7505P)

Enclosure

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# TREE TECH® OTC

Contains TREE TECH OTC -- Systemic Antibiotic Solution

A Microinjection System Utilizing a Systemic Oxytetracycline Antibiotic Solution which aids in the Control of Fire Blight, X-disease, Bacterial Leaf Spot, and Decline of Crop-bearing Peach and Pear trees. TREE TECH OTC also aids in the Control of Certain other Bacterial and Mycoplasma-like Diseases of Forest, Ornamental, Crop-bearing and Non-crop-bearing Trees, Woody Shrubs and Palms such as Ash Yellowings, Fire Blight, Leaf Scorch, Wetwood, and Lethal Yellowings of Coconut Palm and Lethal Decline of Pritchardia Palm.

ACTIVE INGREDIENT:  
Oxytetracycline Calcium Complex . . . . . 4.57%  
OTHER INGREDIENTS . . . . . 95.43%  
100.00%

TREE TECH is a Reg. TM of Florida Silvics, Inc., Morriston, FL 32668

EPA Reg. No. 64014-11  
EPA Est. No. 64014-FL-001

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated**

**STOP: READ THE LABEL BEFORE USE  
FOR USE BY COMMERCIAL ARBORISTS (APPLICATORS)**

**KEEP OUT OF THE REACH OF CHILDREN**

## CAUTION / AVISO

**DEC 17 2007**  
**Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
64014-11**

Si Usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.  
(If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

FIRST AID	
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
HOT LINE NUMBER	
Have the product container of label with you when calling a poison control center or doctor, or going for treatment. You may also contact the Infotrac Chemical Emergency Response System at 1-800-535-5053 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Causes moderate eye irritation. May cause allergic reactions. Treat symptomatically.	

SEE REAR PANEL FOR STATEMENTS OF PRACTICAL TREATMENT AND OTHER PRECAUTIONARY STATEMENTS

**NET CONTENTS:** Each microinjection unit contains 10 mL (0.4 gm a.i. oxytetracycline) per microinjection unit.  
There are 100 microinjection units (1000 mL total) per case

**Sold by:**  
**FLORIDA SILVICS, INC.**  
(dba Tree Tech Microinjection Systems)  
950 SE 215<sup>th</sup> Avenue  
Morriston FL 32668 USA  
(352) 528-5335

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## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes moderate eye irritation. May cause allergic reactions. Avoid contact with eyes or clothing. Harmful if inhaled. Avoid breathing dust. Protective eye wear and chemical-resistant gloves must be worn while handling or installing microinjection units to prevent accidental contact with eyes or skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash separately from household items before reuse.

#### User Safety Requirements

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical resistant gloves
- Protective eyewear

Some materials that are chemical-resistant to this product are barrier laminate, butyl rubber or polyvinyl chloride. If you want more options, follow the instructions from category B on an EPA chemical-resistance category selection chart.

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

#### ENVIRONMENTAL HAZARDS

For terrestrial uses. This pesticide is highly toxic to birds. Do not apply directly to 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 equipment wash water or rinsate.

#### PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat and open flame.

#### DIRECTIONS FOR USE

**IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.** For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible.

#### **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 and restricted entry intervals.

The requirements in this box only apply to uses of this product that are covered by the Workers Protection Standard (WPS).

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.

**THE RESTRICTED-ENTRY INTERVAL (REI) FOR THIS PRODUCT IS "0" HOURS.**

#### GENERAL DIRECTIONS

Applying Tree Tech OTC using the Tree Tech microinjection system:

TREE TECH OTC label and microinjection instructions must be read and understood prior to use or installation of Tree Tech Microinjection Systems microinjection units. Failure to follow these directions may lead to injury to the installer or other persons as well as mechanical or phytotoxic damage to treated trees. The following instructions must be heeded to ensure effective use of the microinjection units containing Tree Tech OTC antibiotic solution:

1. Protective eye wear and rubber or neoprene gloves must be worn while handling or installing the microinjection unit to prevent accidental contact with eyes or skin.
2. When properly installed and activated, the microinjection unit generates internal pressure resulting in the flow of TREE TECH OTC solution through the dispenser tip. The microinjection unit must never be activated unless installed correctly and securely in the tree to be treated.
3. Microinjection units containing TREE TECH OTC may require several hours to empty depending on the health of the treated tree and local weather conditions. Never assume that the microinjection units have been depressurized completely because they appear nearly empty or empty. When removing microinjection units, 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.

4. After microinjection units are removed from the treated trees they must be discarded into the heavy-duty plastic disposal bag included in each case of microinjection units. The bag should be properly sealed and placed in the original carton. Sealed cartons may be returned freight prepaid to Florida Silvics, Inc., (dba Tree Tech Microinjection Systems), 950 SE 215<sup>th</sup> Ave, Morriston, FL 32668, for disposal.

**Installing Microinjection Units:**

1. Determine the number of microinjection units to be installed based upon the spacing of microinjection units at 6-inch intervals around the stem. Unless otherwise noted, microinjection units should be installed in the stem and root flares near the ground line, i.e., 2.0-to-8.0 in. or 5-to-20 cm from the soil surface.

2. Using a cordless electric drill (600-800rpm) with a sharp, clean 11/64-in. (0.4-cm) bit, the installer should drill a hole at the correct stem circumference spacing to a depth of 3/8-to-1/2 in. (1.0-to-1.3 cm) into the wood (xylem) under the bark. A downwardly angle of 45 degrees is recommended for more complete drainage of the microinjection unit.

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. Insert the microinjection unit into the hole without delay. Placing the plastic installation cap over the rear barrel 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 frontal dispenser tip is forced into the funnel-shaped section dislodging an internal septum that allows the TREE TECH OTC solution to flow from the microinjection unit into the tree. When the microinjection unit is positioned correctly in the tree and the septum is dislodged, remove the cap. Push the rear barrel portion of the unit downwardly until the locking mechanism is engaged. This pressurizes the microinjection unit and assists in the movement of TREE TECH OTC into the vascular system of the tree.

4. When the microinjection unit is positioned correctly in the tree and the septum is dislodged, remove the cap. Push the rear barrel portion of the unit downwardly until the locking mechanism is engaged. This pressurizes the microinjection unit and assists in the movement of TREE TECH OTC into the vascular system of the tree.

5. Each hole should be drilled and a microinjection unit installed without delay. After the unit is properly seated, it should be activated. This sequence minimizes the flow of tree sap or resin into the hole prior to uptake of Tree Tech OTC during the microinjection process.

6. When properly installed, the microinjection unit generates internal pressure resulting in the flow of TREE TECH OTC solution through the dispenser tip. The microinjection unit must never be activated unless installed correctly and securely in the tree to be treated.

7. Microinjection units containing TREE TECH OTC may require several hours to empty depending on the health of the treated tree and local weather conditions. Microinjection units should be removed as soon as the evacuation of TREE TECH OTC antibiotic solution is completed.

**APPLICATION:** Apply in all cases when plant root systems are established and actively growing. Application should be applied to the following host plants at first evidence of symptom appearance to maximize the potential for disease control. Install one (1) microinjection unit every six (6) inches around the circumference of the stem approximately 4-to-12 inches from the ground line. Make application of TREE TECH OTC when symptoms first appear and repeat as necessary to aid in disease control. Make no more than three (3) applications per year to forest, ornamental, and non-crop-bearing trees, and woody shrubs. Make no more than four (4) applications per year to palms.

Disease	Host	
	Non-crop-bearing	Crop-bearing
Bacterial blast	Apple Pear	Pear
Bacterial blight	Flowering crabapple Hawthorn Lilac Walnut	
Bacterial canker	Hickory Horse chestnut Maple Mimosa Oak Persian walnut Walnut	
Bacterial leaf scorch	Oak	
Blossom blast	Citrus Grapefruit Lime Tea rose Walnut	
Blossom blight and canker	Almond Apricot Cherry Peach Pear Plum	Peach Pear
Bunch disease	Butternut Pecan Walnut	
Crown gall	Flowering quince Quince	
Decline	Peach Pear Nectarine	

Fire blight	Apple Apricot Cherry Chokecherry Cliff rose Cotoneaster Crabapple Creambush Firethorn Flowering quince Hawthorn Indian hawthorn Loquat Mountain ash Ninebark Pear Pearbush Photinia Plum Quince Rose Serviceberry	Peach Pear
Fruit spot	Avocado	
Leaf and shoot blight	Mock orange	
Leaf blight and brown rot	Mandarin orange	
Leaf spot	Basswood Hibiscus Magnolia	
Lethal decline	Basswood Hibiscus Magnolia	
Lethal decline	Pritchardia palm	
Lethal yellows	Palm	
Phloem necrosis	Elm	

Stem canker	Poplar	
Stubborn disease	Citrus	
Tip dieback	Maple	
Vascular yellows	Ash Elm	
Wetwood/slime flux	Apple Cherry Elm Hickory Maple Oak Peach Plum	
Wetwood/slime flux (cont.d)	Poplar Walnut	

Witches' broom (caused by mycoplasma-like organisms)	Apple Ash Dogwood Elm Lilac Locust Peach Sassafras	
X-disease	Cherry Chokecherry Nectarine Peach Plum	Peach

NOTE: Non-crop-bearing refers to trees that will not bear fruit within twelve months of application.

### GENERAL INFORMATION

TREE TECH OTC systemic antibiotic solution is for use by commercial applicators on all species of trees as well as woody shrubs and palms in commercial and residential landscapes, interior and exterior plantscapes, roadsides, gardens, parks, golf courses, lawns, ground, and other areas where plants are grown.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal of microinjection units.  
Do not apply this product through any type of irrigation system.  
Open dumping is prohibited.  
Store microinjection units at room temperature (45 degrees F -to- 74 degrees F). Do not freeze.

**PESTICIDE STORAGE:** Store product in the closed, original container in a cool, dry, locked place out of the reach of children.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site according to local regulations or at an approved waste disposal facility.

**MICROINJECTION UNIT CONTAINER DISPOSAL:**

**IF EMPTY:** DO NOT REUSE THIS CONTAINER. PLACE IN TRASH OR OFFER FOR RECYCLING IF AVAILABLE.

**IF PARTLY EMPTY:** CALL YOUR LOCAL SOLID WASTE AGENCY OR 1-800-CLEANUP FOR DISPOSAL INSTRUCTIONS. NEVER PLACE UNUSED PRODUCT DOWN ANY INDOOR OR OUTDOOR DRAIN.

Used microinjection units may be placed in the heavy-duty plastic bag that accompanies each case of microinjection units. The bag should be properly sealed, placed into the original shipping carton and returned for disposal freight prepaid to Tree Tech Microinjection Systems, 950 S.E. 215th. Ave. Morriston, FL 32668.

### WARRANTY AND DISCLAIMER STATEMENT

Tree Tech Microinjection systems warrants that this product conforms to the chemical description on the label and is reasonably fit for the use under normal conditions when used strictly in accordance with the directions on the label. To the fullest extent permitted by law, neither Tree Tech Microinjection Systems nor any agents, representatives or sellers make any warranty, guarantee or representation, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use of this material when such use is contrary to label instructions Read and follow the label directions carefully.

TREE TECH Reg. TM of Florida Silvics. Inc.  
Label revised 10/2006