

64014-11

04-25-2008

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

APR 25 2008

Mr. Roger S. Webb  
President  
Florida Silvics, Inc. (dba Tree Tech Microinjection Systems)  
950 SE 215<sup>th</sup> Avenue  
Morrison, FL 32668

Re: Notification to Abbreviate Product Name to: Tree Tech OTC  
EPA Reg No.: 64014-11  
Date of Submission: February 7, 2008

Dear Mr. Webb:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated February 7, 2008, for the product, Tree Tech OTC Ca. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

SIC



Please read instructions on reverse before completing form.

Form Approved OMB No. 2070-0060

Print Form



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Florida Silvics, Inc. / 64014-11	2. EPA Product Manager Mary L. Waller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Florida Silvics, Inc. / Tree Tech OTC Ca	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Florida Silvics, Inc. (dba Tree Tech Microinjection Systems) 950 SE 215th Avenue, Morriston FL 32668 <input 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 _____
<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.)

This oxytetracycline ("OTC") product is registered as Tree Tech OTC Ca for the calcium ("Ca") complex that contains the OTC active ingredient. This abbreviation "Ca" is confusing to the buyer and user, and eliminating this notation would permit a clearer understanding of the product formulation. The proposed name would be "Tree Tech OTC".

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" 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	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
			100		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 10 mL		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product Adhesive/Glue		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> 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 S. Webb	Title President	Telephone No. (Include Area Code) 352/528-5335
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	
4. Typed Name Roger S. Webb	5. Date February 7, 2008	





# Tree Tech®

microinjection systems

February 12, 2008

U.S. Environmental Protection Agency  
Office of Prevention, Pesticides and Toxic Substances  
Attn: Ms Mary L. Waller (PM 21)  
Fungicide Branch, Registration Division  
1 Potomac Yard, Mail Code (7505P)  
Arlington, VA 22202

Dear Ms Waller:

Please find enclosed five (5) copies of my firm's revised label for Tree Tech OTC-Ca, an oxytetracycline solution registered for the control of certain tree diseases and applied through microinjection technology.

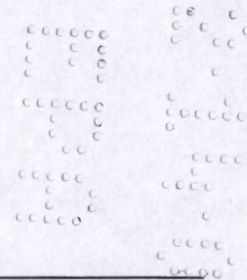
All changes stipulated in your letter of December 17<sup>th</sup>, 2007, have been incorporated. If there are any errors in these final label copies, please contact me at your earliest convenience.

I have also enclosed a copy of EPA Form 8570-1 in which I request permission to change the product's name to a shortened version in order to improve customer understanding of the active ingredient.

Thank you for your cooperation in this matter. I look forward to hearing from you.

Sincerely yours,

Roger S. Webb, Ph.D.  
President





# TREE TECH<sup>®</sup> OTC

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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 Yellows, Elm Yellows, Fire Blight, Leaf Scorch, Wetwood, and Lethal Yellows of Coconut Palm and Lethal Decline of Pritchardia Palm.

ACTIVE INGREDIENT:  
Oxytetracycline Calcium Complex . . . . . 4.57%  
INERT 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

**STOP: READ THE LABEL BEFORE USE**

**FOR USE BY COMMERCIAL ARBORISTS (APPLICATORS)**

**KEEP OUT OF THE REACH OF CHILDREN**

**CAUTION / AVISO**

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.)

<b>FIRST AID</b> Oxytetracycline	
<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, preferable by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
<b>HOT LINE NUMBER</b> Oxytetracycline	
Have the product container of label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-334-7577 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
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).  
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> Ave.  
Morriston, FL 32668 USA  
(352) 528-5335



# PRECAUTIONARY STATEMENTS

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes moderate eye irritation. Prolonged or frequently repeated exposure may cause allergic reactions in some individuals. 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 hands 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 eye wear

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 for pesticide regulation.

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.

### 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).

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

### GENERAL DIRECTIONS

Applying TreeTech 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 chemical resistant gloves (such as rubber or neoprene) 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 chemical resistant gloves (such as rubber or neoprene). The individual must 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 must 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 must 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 32868, 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 trunk 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 trunk 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	None
Bacterial canker	Hickory Horse chestnut Maple Mimosa Oak Persian walnut Walnut	NonC
Bacterial leaf scorch	Oak	None
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	None
Crown gall	Flowering quince Quince	NonC
Decline	Peach Pear Nectarine	None
Fire blight	Apple Apricot Cherry Chokecherry Cliff rose Cotoneaster Crabapple Creambush Firethorn Flowering quince Hawthorn Indian hawthorn Loquat Mountain ash Ninebark Pear Pearlbush Photinia Plum Quince Rose Serviceberry	Peach Pear

Disease	Host	
	Non-crop-bearing	Crop-bearing
Fruit spot	Avocado	None
Leaf and shoot blight	Mock orange	None
Leaf blight and brown rot	Mandarin orange	None
Leaf spot	Basswood Hibiscus Magnolia	None
Lethal decline	Basswood Hibiscus Magnolia	None
Lethal decline	Pritchardia palm	None
Lethal yellows	Palm	None
Phloem necrosis	Elm	None
Stem canker	Poplar	None
Stubborn disease	Citrus	None
Tip dieback	Maple	None
Vascular yellows	Ash Elm	None
Wetwood/slime flux	Apple Cherry Elm Hickory Maple Oak Peach Pear Plum Poplar Walnut	None
Witches' broom (caused by mycoplasma-like organisms)	Apple Ash Dogwood Elm Lilac Locust Peach Sassafras	None
X-disease	Cherry Chokecherry Nectarine Peach Plum	Peach



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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. Do not apply this product through any type of irrigation system.

**STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal of microinjection units. Open dumping is prohibited.

**PESTICIDE STORAGE:** Store product in the closed, original container in a cool, dry, locked place out of reach of children. Store microinjection units at room temperature (45 degrees F -to- 74 degrees F). Do not freeze.

**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:**  
**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then dispose of in a sanitary landfill or by other approved state and local procedures.

Used microinjection units may be placed in the heavy-duty plastic bag that accompanies each case of microinjection units. The bag must 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.

**CONDITIONS OF SALE**

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 extent permitted by applicable law, neither Tree Tech Microinjection Systems nor any agents, representatives, or sellers make any warranty, guarantee, express or implied, concerning the use of this product other than indicated on the label. To the extent permitted by applicable law, buyer assumes all risk of use of this material when such use is contrary to label instructions. Read and follow label directions carefully.

TREE TECH Reg. TM of Florida Silvics, Inc.