

67690-18

11/7/2013

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Laurent Mezin
Regulatory Affairs Manager
SePRO Corporation
11550 North Meridian Street, Suite 600
Carmel, Indiana 46032-4565

NOV 07 2013

Subject: Cutless Tree Implant
EPA Reg. No. 67690-18
EPA Decision Number: 482248
Your label submitted on August 2, 2013 and resubmitted on October 29, 2013 to make multiple updates including storage and disposal, a User Safety Recommendation box, and other formatting and typographical updates

Dear Mr. Mezin:

The application referred to above, submitted under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable.

One copy of the label stamped "Accepted" is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Heather Garvie by phone at: 703-308-0034 or via email at: garvie.heather@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Shaja B. Joyner".

Shaja B. Joyner
Product Manager 20
Fungicide Branch
Registration Division

Enclosure: Stamped label "Accepted"

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[Front label for Non-refillable, rigid containers, any size]



Cutless® Tree Implant

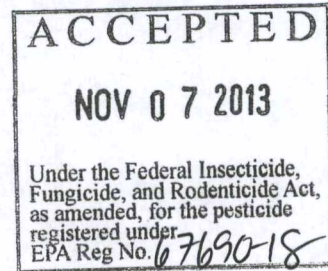
A trunk implanted plant growth regulator for the reduction of terminal growth and biomass production of non-crop trees.

Active ingredient:

flurprimidol: a-(1-methylethyl)-a-[4-(trifluoromethoxy)-phenyl]-5-pyrimidinemethanol93.6%

Other Ingredients 6.4%

Total 100.0%



Each Cutless® Tree Implant contains 0.035 ounce (1 gram) of active ingredient.

Keep Out of Reach of Children

CAUTION / PRECAUCIÓN

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.

(If you do not understand this label, find someone to explain it to you in detail.)

Refer to inside of label booklet for additional precautionary information and Directions for Use including First Aid and Storage and Disposal.

Notice: Read the entire label before using. Use only according to label directions. **Before buying or using this product, read *Terms and Conditions of Use, Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies* at the end of the label booklet. If terms are unacceptable, return at once, unopened.**

SPECIALTY CHEMICAL: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 67690-18
FPL 20131028

EPA Est. No. _____
[SPC-] _____

*Cutless® is a registered trademark of SePRO Corporation
**SePRO Corporation 11550 North Meridian Street, Suite 600, Carmel, IN 46032
U.S.A.**

Specialty Growth Regulator

Contains 250 Implants

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[Label booklet text, ALL containers]

First Aid	
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 to an unconscious person.
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 on 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 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 mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency endangering life or property involving this product, call INFOTRAC at 1-800-535-5053.</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Harmful If Swallowed. Causes Eye Irritation. Avoid contact with eyes, skin, or clothing.

Keep Out of Reach of Children

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PERSONAL PROTECTIVE EQUIPMENT (PPE)

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

Applicators and other handlers must wear:

- Long-sleeved shirt and pants;
- Shoes plus socks; and

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- Chemical-resistant gloves (such as natural rubber or barrier laminate).

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.

USER SAFETY RECOMMENDATIONS

Users should:

- Wear chemical resistant gloves when handling this product.
- Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing.

ENVIRONMENTAL HAZARDS

Application by methods other than as or tree implant may cause growth regulation effects in nontarget plants. 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 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 trees being grown for sale or other commercial use, or for commercial seed production, or for the production of timber or wood products, or for research purposes.

PRODUCT INFORMATION

Cutless® Tree Implant is a plant growth regulator recommended for growth suppression in a variety of non-crop tree species. Cutless® Tree Implants reduce vegetative growth and can significantly reduce the volume of biomass that must be removed from trees when trimming occurs.

Growth suppression is achieved through inhibition of gibberellin biosynthesis resulting in reduced internodal elongation in terminal shoot growth. Smaller leaves and intensified greening occur in some species. Active ingredient from the trunk implant treatments is translocated through the xylem to growing leaves and stems and provide long-term growth suppression.

Cutless® Tree Implants should be installed just prior to or during the most rapid period of water uptake when trees are actively transpiring. This period occurs from one month prior to bud swell to just before color change in the fall. Scheduling conflicts may require application during the dormant season, which is acceptable. Where pruning is required, best results may 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 applications can be made once growth regulator effects start to decline. In follow-up treatments, reduced application rates may be required on certain species to avoid over-regulation of terminal growth.

Use Precautions

Cutless implants should not be installed in trees under the following conditions:

- Trees with large wounds, lightning strikes, dead portions of crown, general poor health and vigor, or diseased.
- Sugar maple trees or any other trees that may be tapped for sugar.
- Fruit or nut trees which may be harvested for food or feed.
- Trees under severe stress from drought.
- Do not reapply until growth reduction symptoms begin to disappear. Rates should be reduced for trees that have experienced heavy crown removal.

Tree Implant Techniques

Cutless® Tree Implants should be installed in a manner which results in even distribution of the active ingredient throughout the above ground portion of the tree. The number of implants required should be determined by measuring the tree diameter approximately 4.5 feet above the ground to accurately determine the required dosage in grams of active ingredient per inch of diameter.

Space the holes for implants evenly around tree near the ground line. Areas to avoid are regions directly over girdling roots or adjacent to trunk damage abrasions and stem defects. Whenever possible, implants should be placed directly above a buttress root in the crown of the flare (A). If a large flare exists, place two or more implants in the same flare but in the sides of the root so that placement is directly into the shoulders (B).

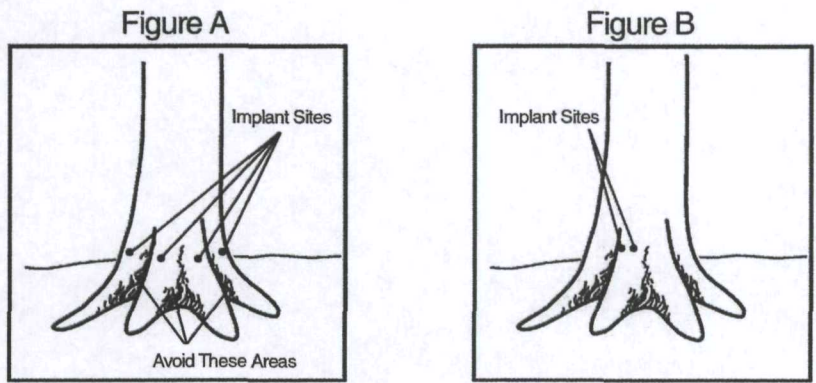
While the ideal implant spacing interval is six to eight inches, the spacing can be altered to avoid centering in the sinus between buttresses. If an excessive amount of holes are needed for the high rates (1.0 and 1.5 gram) two implants can be inserted at the same entry point by drilling a "V" and placing one implant in each side of the "V".

Each implant should be firmly seated into the tree trunk one inch below the bark. Holes should be drilled with a 3/8" self centering (brad point) spiral bit. Stop collars or tape can be used to set hole depths (1 inch plus bark thickness) on the drill bit. Each hole should be filled or flushed with water from a squirt bottle prior to implant insertion.

Implants can be installed anytime of the year. However, best results may be achieved when placed in the tree during active growth or 2-3 months prior to active growth. During periods when trees are in full leaf, best results may be obtained if installation is made when moisture stress is low. This can be accomplished by installing implants after significant rainfall/irrigation; or in early morning to avoid moisture stress induced by transpiration moisture loss in mid-day.

Holes may be covered with bark dressing or colored latex caulk. Use sparingly (just enough to seal hole). **Do not apply pressure and enclose the implant.**

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Application Rates for Cutless® Tree Implants

Each implant contains a measured dose of growth regulator (1 gram of active ingredient). Use the table below to determine the number of Cutless® Tree Implants to be placed in each tree according to tree diameter. Trees which have been heavily pruned and have small crowns relative to diameter should receive the low rates within the appropriate species group. Trees not specifically identified on this label may be treated if all other label recommendations are followed.

Diameter of Tree 4 ft Above the Ground (inches)	Group 1 Required Number of Implants per Tree		Group 2 Required Number of Implants per Tree	
	0.50g Rate	0.75g Rate	1.00g Rate	1.50g Rate
6	3	4	6	9
7	3	5	7	10
8	4	6	8	12
9	4	7	9	13
10	5	7	10	15
11	6	8	11	16
12	6	9	12	18
13	7	10	13	19
14	7	10	14	21
15	8	11	15	22
16	8	12	16	24
17	9	13	17	26
18	9	13	18	27
19	10	14	19	28
20	10	15	20	30
21	11	16	21	31
22	11	16	22	33
23	12	17	23	34
24	12	18	24	36
25	13	19	25	37
26	13	19	26	39
27	14	20	27	40

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28	14	21	28	42
29	15	22	29	43
30	15	22	30	45

Group 1 Species		Group 2 Species
Alder Red	Maple, Norway	Aspen
Ash	Maple, Red	Cottonwood
Black Olive	Maple, Silver	Melaleuca
Black Cherry	Maple, Sugar	Sycamore
Black Locust	Oak, Laurel	Willow, Black
Black Walnut	Oak, Live	
Box Elder	Oak, Pin	
Dogwood	Oak, Post	
Elm, American	Oak, Red	
Elm, Chinese	Oak, Southern Red	
Elm, Siberian	Oak, Water	
Elm, Winged	Oak, Willow	
Blue Gum Eucalyptus	Sugarberry	
Hackberry	Sweetgum†	

† Do not exceed the 0.5 gram rate.

Note: Cutless® Tree Implant is not recommended for application on conifers (e.g., pine, spruce, fir or juniper).

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in original container only.

Pesticide Disposal: Wastes resulting from the use of this product which cannot be used according to label directions should be disposed of at an approved waste disposal facility.

Nonrefillable Container Handling (rigid, any size):

Do not reuse or refill this container. Offer for recycling if available. If recycling not available for fiber carton/drum, then dispose of both foil overpack and drum/carton in a sanitary landfill or incinerator, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

TERMS AND CONDITIONS OF USE

If terms of the following *Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies* are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, to the extent consistent with applicable law, use by the buyer or any other user constitutes acceptance of the terms under *Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies*.

WARRANTY DISCLAIMER

SePRO Corporation warrants that the 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. SEPRO CORPORATION MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF

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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. Plant 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, ect.), 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 SePRO Corporation as the seller. To the extent consistent with applicable law, 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 SePRO Corporation'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.

To the extent consistent with applicable law, SePRO Corporation shall not be liable for losses or damages resulting from handling or use of this product unless SePRO Corporation is promptly notified of such losses or damages in writing. In no case shall SePRO Corporation be liable for consequential or incidental damages or losses.

The terms of the *Warranty Disclaimer*, *Inherent Risks of Use* and this *Limitation of Remedies* can not be varied by any written or verbal statements or agreements. No employee or sales agent of SePRO Corporation or the seller is authorized to vary or exceed the terms of this *Warranty Disclaimer* or *Limitations of Remedies* in any manner.

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[Base label for Non-refillable, rigid containers, any size]



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Specialty Growth Regulator

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