


67690-34

03/14/2006

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

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

**Application for Pesticide - Section I**

1. Company/Product Number 67690-34	2. EPA Product Manager Tony Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Flurprimidol Solution	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) SePRO Corporation 11550 N. Meridian Street, Suite 600 Carmel, IN 46032  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), 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 _____	<b>NOTIFICATION</b>  <b>MAR 14 2006</b>
<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.	

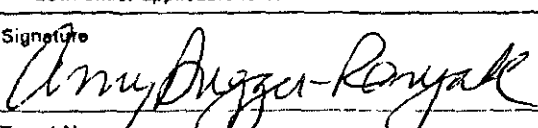
**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

This is a notification to the agency to add additional language to the Storage and Disposal Section of the product label. The new language, as follows, is taken directly from PR Notice 83-3:  
 ". If not returned, completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.]

**Section - III**

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input 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 type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions	
6. Manner in Which Label is Affixed to Product <input 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 applica.i.u..)		
Name Amy Dugger-Ronyak	Title Regulatory Affairs Specialist	Telephone No. (Include Area Code) 317-580-8280
<b>Certification</b> 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, both under applicable law.		8. Date Application Received  <b>(Stamped)</b>
2. Signature 	3. Title Regulatory Affairs Specialist	
4. Typed Name Amy Dugger-Ronyak	5. Date 02/22/2006	

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# FLURPRIMIDOL SOLUTION

{Insert}

FLURPRIMIDOL SOLUTION  
SePRO Direct-Inject™ Chemical

NOTIFICATION  
MAR 14 2006

For management, reduction or regulation of shoot growth and overall canopy growth of a wide variety of ornamental trees in utility rights-of-way, urban environments, residential areas and interior plantscapes (such as those in domestic landscape/garden areas, public display plantings, recreation areas, highway and other transportation rights-of-way, scenic corridors, storage areas, forest areas, campgrounds, and other uncultivated, nonagricultural areas)

For Use By Professional Arborists/Applicators, Grounds Maintenance Professionals, City Foresters, Electric Utility Foresters/Contractors and Landscapers  
To be used only with the SePRO Direct-Inject™ Tree Injection System  
• Easy • No Drilling • No Posting •

**Active Ingredient:**

Flurprimidol\* (CAS No. 56425-91-3) ..... 48.1%

**Other Ingredients** ..... 51.9%

Total ..... 100.0%

\* $\alpha$ -(1-methylethyl)- $\alpha$ -[4-(trifluoromethoxy) phenyl]-5-pyrimidinemethanol

Contains 2.3 oz. (65.6 grams) active ingredient per 4 fl. oz. (120 ml) bottle

[Contains 19.4 oz. (547 grams) active ingredient per 1 qt. 2 fl. oz. (1000 ml) pack]

**Keep Out of Reach of Children**  
**CAUTION**  
See inside [below] for additional precautionary statements and complete Directions for Use.

Net Contents 4 fl. oz. (120 ml)  
[Net Contents 1 qt. 2 fl. oz. (1000 ml)]

EPA Reg. No. 67690-34

EPA Est. 69117-NE-1

Manufactured by  
**SePRO Corporation**  
Carmel, IN 46032 USA  
www.sepro.com

**PRECAUTIONARY STATEMENTS**  
**Hazards to Humans & Domestic Animals**

**CAUTION:** Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash clothing before reuse.

**First Aid**

<b>If Swallowed</b>	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor 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>• Immediately rinse skin with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	

(Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.)

**Environmental Hazards**

Do not apply directly to water, 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 washwaters or rinsate.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**For Use By Professional Arborists/Applicators, Grounds Maintenance Professionals, City Foresters, Electric Utility Foresters/Contractors and Landscapers**

**General Information**

**Do not Inject Food Bearing Trees**

**SePRO Direct-Inject™ Tree Injection Systems**

The SePRO Direct-Inject™ Tree Injection Systems are easy to use. Many trees can be treated in as little as five minutes, allowing applicators to treat trees quickly. There is no need to wait for absorption (translocation) because the chemical is injected into the cambial area of the tree (the active vascular system) and held inside by the self-sealing WedgeCheks™. Because the chemical is placed right where the tree can use it, effectiveness of the chemical is increased. Use in sunny or overcast conditions, rainy or dry, at any time of day. As no drilling or implants are required, you can treat trees every two years, with no threat of long-term or permanent damage to the tree.

**Indications**

Flurprimidol Solution is a plant growth regulator (PGR) [tree growth regulator] [TGR] intended for the management, reduction or regulation of shoot growth and overall canopy growth of a wide variety of ornamental trees in utility rights-of-way, urban environments, residential areas and non-crop areas. Flurprimidol Solution has demonstrated desirable growth regulation in many woody ornamental plants and deciduous tree species, without phytotoxic effects. Use Flurprimidol Solution to control canopy growth, pruning volume/frequency and for the associated benefits of stimulated root development, increased drought tolerance, increased stress tolerance and stabilizing trees in mild decline.

Growth reduction is beneficial for trees planted under and near utility [power] lines, close to homes, decks, patios and sidewalks, in areas with restricted space for canopy and/or root development, or in areas where excessive growth may block a scenic view. Utility arborists look to growth reduction treatments to provide benefits such as reduced vegetation-related power outages, more efficient trimming operations, lengthened trim cycles and reduced biomass of tree trimmings. The shortening of internodal growth also results in increased density of the tree canopy, enhancing shade and screening benefits. Flurprimidol Solution may suppress "dbh" (diameter at breast height) growth which can benefit trees growing in municipal vaults and other confined areas.

**In commercial and residential areas,** Flurprimidol Solution is an option for trees planted too close together, close to homes, in tightly landscaped areas, near foundations, under power lines, in interior spaces or when a wrong tree for the site cannot be removed. Flurprimidol Solution applications result in a reduction of canopy growth and can increase the root-to-canopy ratio.

**In municipal applications,** Flurprimidol Solution regulates and reduces growth on trees planted under and near power lines or along rights-of-way, on trees near streetlights, intersections or municipal/commercial signage, in airport approach

areas and in areas where vista control is desired. Applications of Flurprimidol Solution may result in extended pruning/trimming cycles and reduce the need for pruning in dangerous locations.

Tree Species	Application Rate
Alder (red), Ash, Aspen, Blackolive, Black Cherry, Black Locusts, Black Walnut, Boxelder, Cottonwood, Dogwood, Elms (American, Chinese, Siberian, Winged), Blue Gum Eucalyptus, Hackberry, Maples (Norway, Red, Silver, Sugar), Melaleuca, Oaks (Laurel, Live, Pin, Post, Red, Southern Red, Water, Willow), Pine (Australian), Sugarberry, Sweetgum, Sycamore, Tallowtree (Chinese) and Willow (Black)	1 ml per 4" of trunk circumference measured within 12" of the ground. Dosage may be increased to 2 ml per injection site for trees with diameters over 12". Application rates vary by tree species and local conditions.

**Note:** A single Flurprimidol Solution application provides tree growth regulation for three to five years. Do not inject this product more than once every two years as more frequent application is known to cause adverse effects on trees, such as stacking of leaves.

Shoot growth is most common between April and June. Flurprimidol Solution applications in the preceding fall or early spring provide more first-year growth control than applications made at other times. Inject Flurprimidol Solution at any time during the spring, summer or fall, as long as transpiration is occurring. [Inject Flurprimidol Solution any time between bud swell in the spring and the beginning of fall coloration.] Tree bark must be pliable enough to accept the injection; this depends on local weather conditions. Make treatments in the summer or fall, prior to dormancy for deciduous trees, to regulate growth the following spring. Regardless of application timing, growth reduction within the first year of treatment may not be as noticeable as in subsequent years.

The growth varies based on species, location, climatic factors, environmental conditions, etc. Before large-scale tree injection programs are pursued, establish by testing on a limited number of trees, the best rates to produce the desired results under local growing conditions. Treatment may cause bark damage; check bark before repeating treatments.

**Do not inject a tree showing one or more of the following conditions:**

1. The tree is hollow or decayed in an area equal to one-half or more of its diameter.
2. The tree is heavily decayed in the crown. Heavy decay is indicated by dead or decayed limbs and branches over most of the crown, or one or two major limbs over 6" in diameter showing signs of decay.
3. The tree is missing bark from the main trunk one-half way around or more.
4. The tree shows other signs of poor condition;
  - a) Heavy, deep cracking of the bark on a main branch showing interior wood.
  - b) Deformed or misshapen twigs and branches.
  - c) Size or color of leaves inappropriate for the season of the year.
  - d) Tree under stress from insect infestation.

**How to Use SePRO Direct-Inject™ Chemicals with SePRO Direct-Inject™ Tree Injection Units**

1. Use only SePRO's Direct-Inject™ chemicals with your Unit as they have been formulated specifically for the Direct-Inject™ systems. Use of other chemicals will invalidate warranty.
2. Attach the chemical bottle or pack to the Direct-Inject™ Unit and prepare the Unit to make injections.
3. Set the delivery volume on the Unit.
4. Follow the label directions on this insert to determine the amount of chemical and number of injection sites.
5. Determine where to make injections in the bark. Generally, the Injection Tip is inserted into the fissure (valley) of the tree bark. Inject thin-barked trees in the thicker part of the tree bark. Thick-barked trees require a longer injection Tip.
6. Make injections working around the circumference of the tree. For Wedgle™ Direct-Inject™ Units make injections within 12" of the ground. For Portle™ Direct-Inject™ Units the injection height varies depending on type of tree and location.
7. With a smooth motion, firmly squeeze the Injection Unit trigger or handles. This releases a pre-measured chemical dose to the tree.
8. Slowly withdraw the Injection Tip. The Wedgle™ WedgeChek or Portle™ Injection Sleeve [PortChek] plugs the hole, keeping the chemical in the tree.
9. Continue making injections moving around the tree until the entire tree trunk has been treated.
10. During use, periodically clean the Direct-Inject™ Unit to prevent clogging.

Sho

### Storage and Disposal

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

**Pesticide Storage:** Store in a tightly closed container in a cool, dry place. **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 dispose of in an incinerator or landfill approved for pesticide containers. [Return the used 1 qt. 2 fl. oz. (1000 ml) chemical pack to SePRO, in the provided pre-paid mailer, for disposal. If not returned, completely empty. Do not reuse or refill. Do not dispose of empty bag in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.]

### Notice of Warranty

SePRO warrants that this product conforms to the chemical description on the label and is reasonably fit for use under average conditions when used strictly in accordance with the directions on the labeling. SePRO does not make or authorize any agent or representative to make any other warranty, guarantee or representation, express or implied, concerning this product.

For assistance contact

## SePRO Corporation

Carmel, IN 46032 USA

Phone: (317) 580-8282

[www.sepro.com](http://www.sepro.com)

Direct-Inject™, Wedgle™ and WedgeChek™ are trademarks of ArborSystems

Wedgle™ Tip is protected by U.S. Patent #5,239,773

WedgeChek™ is protected by U.S. Patent #5,797,215

Created: December 7, 2005

Update: February 22, 2006

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{Box Label}

**FLURPRIMIDOL SOLUTION**  
**SePRO Direct-Inject™ Chemical**

**For management, reduction or regulation of shoot growth and overall canopy growth of a wide variety of ornamental trees in utility rights-of-way, urban environments, residential areas and interior landscapes**  
(such as those in domestic landscape/garden areas, public display plantings, recreation areas, highway and other transportation rights-of-way, scenic corridors, storage areas, forest areas, campgrounds, and other uncultivated, nonagricultural areas)

**For Use By Professional Arborists/Applicators, Grounds Maintenance Professionals, City Foresters, Electric Utility Foresters/Contractors and Landscapers**  
**To be used only with the SePRO Direct-Inject™ Tree Injection Systems**  
• Easy • No Drilling • No Posting •

**Active Ingredient:**

Flurprimidol\* (CAS No. 56425-91-3) ..... 48.1%

**Other Ingredients** ..... 51.9%

Total ..... 100.0%

\* $\alpha$ -(1-methylethyl)- $\alpha$ -[4-(trifluoromethoxy) phenyl]-5-pyrimidinemethanol

Contains 2.3 oz. (65.6 grams) active ingredient per 4 fl. oz. (120 ml) bottle

[Contains 19.4 oz. (547 grams) active ingredient per 1 qt. 2 fl. oz. (1000 ml) pack]

**Keep Out of Reach of Children**  
**CAUTION**  
See insert for additional precautionary statements  
and complete Directions for Use.

Net Contents 4 fl. oz. (120 ml)  
[Net Contents 1 qt. 2 fl. oz. (1000 ml)]

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**SePRO Direct-Inject™ Tree Injection Systems:** The SePRO Direct-Inject™ Units are designed to be used only with SePRO's pre-bottled [pre-packed] chemicals. Tampering with bottles [packs] or contents may cause non-warranted damage to your injection system.

**Storage and Disposal**

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

**Pesticide Storage:** Store in a tightly closed container in a cool, dry place. **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 dispose of in an incinerator or landfill approved for pesticide containers. [Return the used 1 qt. 2 fl. oz. (1000 ml) chemical pack to SePRO, in the provided pre-paid mailer, for disposal. If not returned, completely empty pack may be disposed of in a sanitary landfill or by incineration, or if allowed by State and local authorities, by other means. Do not burn. Do not inhale. Do not get in eyes. Do not get on skin. Do not get on clothing. Do not get on shoes. Do not get on children. Do not get on pets. Do not get on animals. Do not get on birds. Do not get on fish. Do not get on aquatic life. Do not get on plants. Do not get on crops. Do not get on food. Do not get on feed. Do not get on water. Do not get on air. Do not get on soil. Do not get on ground. Do not get on surface water. Do not get on groundwater. Do not get on ice. Do not get on snow. Do not get on frost. Do not get on hail. Do not get on rain. Do not get on wind. Do not get on sun. Do not get on moon. Do not get on stars. Do not get on planets. Do not get on galaxies. Do not get on universe.]

EPA Reg. No. 67690-34      EPA Est. 69117-NE-1

Manufactured by  
**SePRO Corporation**  
www.sepro.com

Created: December 7, 2005  
Update: February 22, 2006

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{Container Label}

**FLURPRIMIDOL SOLUTION**  
**SePRO Direct-Inject™ Chemical**

For management, reduction or regulation of shoot growth and overall canopy growth of a wide variety of ornamental trees in utility rights-of-way, urban environments, residential areas and interior plantscapes (such as those in domestic landscape/garden areas, public display plantings, recreation areas, highway and other transportation rights-of-way, scenic corridors, storage areas, forest areas, campgrounds, and other uncultivated, nonagricultural areas)

For Use By Professional Arborists/Applicators, Grounds Maintenance Professionals, City Foresters, Electric Utility Foresters/Contractors and Landscapers  
To be used only with the SePRO Direct-Inject™ Tree Injection Systems

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**Other Ingredients** ..... 51.9%

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and complete Directions for Use.

Net Contents 4 fl. oz. (120 ml)  
[Net Contents 1 qt. 2 fl. oz. (1000 ml)]

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**SePRO Direct-Inject™ Tree Injection Systems:** The SePRO Direct-Inject™ Units are designed to be used only with SePRO's pre-bottled [pre-packed] chemicals. Tampering with bottles [packs] or contents may cause non-warranted damage to your injection system.

**Storage and Disposal**

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

**Pesticide Storage:** Store in a tightly closed container in a cool, dry place. **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 dispose of in an incinerator or landfill approved for pesticide containers. [Return the used 1 qt. 2 fl. oz. (1000 ml) chemical pack to SePRO, in the provided pre-paid mailer, for disposal. If not returned, completely empty bag into appropriate equipment and dispose of empty pack in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.]

EPA Reg. No. 67690-34      EPA Est. 69117-NE-1

Manufactured by  
**SePRO Corporation**  
www.sepro.com

{Note: Portle™ may be universally substituted for Wedgle™}  
{ } Denotes alternate/optional language  
{ } Denotes language that does not appear on market labeling

**{Additional Selling/Marketing Copy for use in conjunction with other label elements; on the website; and in promotional materials, displays, etc.}**

#### **General Information**

Flurprimidol Solution is a plant growth regulator [PGR] [tree growth regulator] [TGR] developed for the management, reduction or regulation of shoot growth and pruning volume of a wide variety of ornamental trees in utility rights-of-way, urban environments, residential areas and non-crop areas. Flurprimidol Solution has been shown to effectively reduce the growth rate of trees which 1) reduces the frequency of maintenance pruning, saving on labor time and expenses [costs] and 2) reduces the biomass removed when treated trees are pruned, reducing pruning time and hauling/disposal expenses.

Flurprimidol Solution is a SePRO Direct-Inject™ chemical developed by SePRO for use with the SePRO Direct-Inject™ Tree Injection System. Flurprimidol Solution is intended for use by arborists, grounds maintenance professionals, city foresters, electric utility foresters/contractors and landscapers.

Flurprimidol, the active ingredient in Flurprimidol Solution, inhibits the production of the plant growth hormone [compound] gibberellin [gibberellic acid]. Gibberellin promotes cells' elongation within tree tissues. When gibberellin levels are lowered cells still divide but do not elongate as much as those in untreated trees. The reduction in gibberellin reduces shoot growth resulting in shorter, more compact internodes in shoots. Flurprimidol Solution reduces the production of gibberellin resulting in shorter, compact shoot growth.

Some growth regulators slow the rate of growth by inhibiting cell division. Flurprimidol Solution is a growth regulator with a different mode of action. Cell division is not suppressed, but individual cells will not elongate as much as untreated cells. By reducing the production of gibberellins, Flurprimidol Solution applications result in shortened internodal growth. Overall tree [plant] size is more condensed. Growth reduction within the first year of treatment may not be as noticeable as in subsequent years.

Growth reduction is beneficial for trees planted under and near utility [power] lines, close to homes, decks, patios and sidewalks, in restricted vaults, [municipal trees planted in restricted vaults,] or in areas where excessive growth may block a scenic view. Utility arborists site PGR [TGR] benefits such as reduced vegetation-related power outages, more efficient trimming operations, lengthened trim cycles and reduced biomass of tree trimmings. The shortening of internodal growth also results in the thickening of the tree canopy, enhancing shade and screening benefits. Leaves often exhibit a darker green color. The reduction in growth may allow extension of trim cycles.

A 1993 report on flurprimidol<sup>1</sup> concluded that "shoot regrowth suppression and biomass reduction averaged 63% and 75%, respectively, in the four species tested" (Silver Maple, Willow Oak, Water Oak and Norway Maple) and "the reduction in trim and chip time was directly related to these reductions in growth, averaging 55% for the four species tested."

Condensed vegetative growth results in a higher root-to-crown [root-to-shoot] [root-to-canopy] ratio. In locations where the root area is limited, a smaller canopy may be desirable enabling the root system to adequately support the canopy. Locations with limited root space include parking lots, urban commercial-area plantings, areas surrounded by sidewalks, container plantings and some urban yards. A high ratio between the root system and the canopy can benefit trees in dry locations by helping prevent dehydration stress. A high ratio between the root system and the canopy offers potential for improved stress resistance or damage resulting from drought, air pollution and temperature extremes.

With a single Flurprimidol Solution application, vegetative growth can be reduced by 40% to 90% over a three-year period. Results vary depending upon tree species and local growing conditions.

Flurprimidol Solution reduces tree growth and has been associated with a variety of "pre-stress conditioning" benefits including: more tree tolerance to unfavorable conditions such as drought and high temperature, an increased tree tolerance to stress-related disease, stimulation of fibrous root systems in newly transplanted and established trees, and observed stabilization/regained health of overly mature trees and trees in mild decline.

<sup>1</sup>Tree growth reduction following application of flurprimidol tree growth regulator, by K.D. Redding, P.L. Burch and K.C. Miller, in Down to Earth, Vol. 48, No. 2, Fall/Winter 1993.

#### **SePRO Direct-Inject™ Tree Injection System**

The Direct-Inject™ systems are effective. Chemicals are injected directly into the tree. Because the chemical is placed right where the tree can use it, effectiveness of the chemical is increased. Also, because no chemical is lost in non-active



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wood, the Direct-Inject™ systems allow you to use less chemical to achieve high levels of effectiveness; this saves money and reduces chemical waste. With no holes to drill, no air or pathogens are allowed to enter the tree, potential decay never starts and long term wounding is prevented. The tree's ability to move water and nutrients, and to store food, is not compromised.

Pre-mixed chemicals are supplied in self-sealing containers. After injections have been made, you have only one small container of which to dispose. Concerns you may have had when spraying will be eliminated. And with a closed system there is no mixing.

With no drilling required the SePRO Direct-Inject™ Systems:

- Minimize wounding to keep out fungi, bacteria, and insects.
- Prevent air from getting into the tree. When air is allowed into a tree's vascular system, it cuts off the flow of water and nutrients.
- Require no drills, power supply or other bulky equipment.

With these systems and chemicals, tree care professionals effectively combat and manage many of the most devastating environmental plant threats.

The SePRO Direct-Inject™ Systems are designed to preserve and protect treated trees. Many trees can be treated in as little as five minutes. The SePRO Direct-Inject™ Systems are among the most efficient chemical delivery systems available. You achieve control with less chemical because chemical is placed precisely where the tree can best use it. No chemical is lost in dead wood.

SePRO Direct-Inject™ chemicals are integral parts of the Direct-Inject™ Tree Injection Systems. Use only SePRO's Direct-Inject™ chemicals with the Direct-Inject™ Units. Using unauthorized chemicals with the SePRO Direct-Inject™ Systems constitutes a violation of Federal law.

#### Chemical Selection

Your distributor can advise you on the best chemical selections for trees in your area. See our website ([www.sepro.com](http://www.sepro.com)) for additional information.

#### Flurprimidol Solution

Common name: Cutless® (Flurprimidol)

Chemical:  $\alpha$ -(1-methylethyl)- $\alpha$ -[4-(trifluoromethoxy) phenyl]-5-pyrimidinemethanol

Cutless® is a registered trademark of Sepro Corporation.

Created: December 7, 2005

Update: February 22, 2006

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SePRO Corporation • 11550 North Meridian Street • Suite 600 • Carmel, Indiana 46032-4565  
Phone: (317) 580-8282 • Fax: (317) 580-8280

February 22, 2006

Mr. Tony Kish  
Product Manager 22  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7505C)  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202-4501

**RE: Notification Submission of Additional Text to Storage and Disposal Statement  
Flurprimidol Solution  
EPA Reg. No. 67690-34**

Dear Mr. Kish:

On behalf of SePRO Corporation (11550 North Meridian Street, Suite 600, Carmel, Indiana 46032-4565, EPA Company #67690), I am submitting information to update the product label per Pesticide Registration Notice 83-3 for Flurprimidol Solution to include additional language in the Storage and Disposal section of the label. The additional text has been highlighted. Please find enclosed the following information:

- Application for Pesticide, EPA Form 8570-1; and
- One (1) copy of the updated label.

I have not enclosed a confidential statement of formula with this submission as nothing has changed on it as a result of this notification.

This notification is consistent with the provisions of the 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 USC Sec. 1001 to willfully make any false statement to the 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 may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions regarding this submission, please contact me at (317) 580-8286.

Sincerely,

A handwritten signature in black ink that reads "Amy Dugger-Ronyak". The signature is written in a cursive, flowing style.

Amy Dugger-Ronyak  
Regulatory Affairs Specialist  
SePRO Corporation

Enclosures (2)  
cc: Steve D. Cockreham, SePRO