

69117-1

4/14/2008

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

APR 14 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Kim Davis
ArborSystems
c/o RegWest Company, LLC
30856 Rocky Road
Greeley, CO 80631-9375

Subject: Alternate Delivery System and Minor Revisions
Pointer™ Insecticide
EPA Reg. No. 69117-1
Your Submission date, January 16, 2008

Dear Ms. Davis:

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

1. Remove all references to the word "General" throughout the label. General appears in section headings on pages 2, 9, 11, and 15. The Agency considers the term "General" to be non-enforceable; therefore, the Agency is requiring the term to be removed from section titles.
2. Proposed sub-label D must be removed from the master label of EPA registration 69117-1. This registration currently has a residential use label (Sub-Label C) and the Agency is not inclined to support an additional residential label with a different delivery system and directions for use bearing the same registration number. Should you wish to pursue sub-label D, it must be submitted as a new product and would be subject to a PRIA II fee. For future reference, the Agency feels that sub-label D directions for use may be too difficult for homeowners to understand and follow correctly. There are no pictures or diagrams to show the loading of the doses. Further, the Agency is unsure of the ease at which the new device can be used or of new hazard to human exposure since the doses are no longer pre-measured. Therefore, sub-label D is being removed and the stamp label will maintain only sub-label A, B, and C.

3. On page 6 of 17, the reference to “(Additional Selling/Marketing Copy.....displays, etc.)” is not acceptable. Marketing claims must be approved by the Agency. Further, the Arbor System website (<http://arborsystem.com>) contains claims that have not been authorized as part of the registration of this product. This is considered to be collateral labeling because of your website reference on your label and is subject to enforcement action by the Agency if the 2 year claim of control for Emerald Ash Borer and “curative” is not removed. The Emerald Ash Borer is a quarantine pest and the Agency requires acceptable efficacy data to support your 2 year claim. Curative implies that the tree is cured which is false and misleading.

Sincerely,



Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

POINTER™ Insecticide

{Sub-Label A: Commercial Label}

{Bottle Box Insert/Pouch Box Label}

POINTER™ Insecticide ArborSystems™ Direct-Inject™ Chemical

- Easy • No Drilling • No Posting • Saves Time and Money

For Systemic Insect Control in 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 ArborSystems™ Direct-Inject™ Tree Injection Systems

Active Ingredient:

Imidacloprid (CAS No. 138261-41-3) 5%

Other Ingredients 95%

Total 100%

Contains 0.2 oz. (6 grams) active ingredient per 4 fl. oz. (120 ml) bottle.

[Contains 0.05 oz. (1.5 grams) active ingredient per 1 fl. oz. (30 ml) bottle [pack].]

[Contains 1.75 oz. (50 grams) active ingredient per 1 qt. 2 fl. oz. (1000 ml) pack.]

Keep Out of Reach of Children
WARNING
See inside [below] [side/back panels] for additional
precautionary statements and complete Directions for Use.

Net Contents: 4 fl. oz. (120 ml)

[Net Contents: 1 fl. oz. (30 ml) {Sample size}]

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

EPA Reg. No. 69117-1

EPA Est. 69117-NE-1

Sold by

ArborSystems™

P.O. Box 34645

Omaha, NE 68134

www.ArborSystems.com

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Harmful if swallowed, inhaled or absorbed through skin. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear safety glasses. Thoroughly wash with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ACCEPTED
with COMMENTS
in EPA Letter Dated
APR 14 2008
under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
69117-1

First Aid

If Swallowed	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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 by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

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

Environmental Hazards

This product is highly toxic to fish and aquatic invertebrates. 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. This product is highly toxic to bees exposed to direct treatment or residues on blooming plants or weeds. Do not apply this product to blooming plants or weeds if bees are visiting the treatment area.

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 Plants

ArborSystems™ Direct-Inject™ Tree Injection Systems

The ArborSystems™ Direct-Inject™ Tree Injection Systems are easy to use. Most trees are treated in as little as five minutes or less, allowing applicators to treat trees quickly. There is no need to wait for absorption (translocation). 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 year after year, with no threat of long-term or permanent damage to the tree. These systems minimize wounding and promote long-term tree vigor.

Indications

As a preventative, apply in the early spring prior to insect activity in the tree. As a curative, apply as needed spring through fall, provided the bark is pliable enough to accept the chemical injections. One application provides control for two years [two seasons].

Pests Controlled	Dosage
Adelgids (including Hemlock Woolly Adelgids), Aphids, Armored Scales (suppression), Asiatic Garden Beetles, Bark Beetles (including Asian Longhorned Beetle, Citrus Longhorned Beetle and IPS), Black Vine Weevil Larvae, Chafers, Elm Leaf Beetles, Eucalyptus	1 ml per 4" to 6" of trunk circumference measured within 12" of the ground. Dosage may be increased to 2 ml per injection

5/15

Longhorned Borer, Flatheaded Borers (including Alder-Birch Borer, Bronze Birch Borer and Emerald Ash Borer), Japanese Beetles, Japanese Beetle Larvae, Lacebugs, Leafhoppers, Leafminers, Mealybugs, Oriental Beetles, Pine Bark Beetles, Pine Tip Moth Larvae, Psyllids, Royal Palm Bugs, Sawfly Larvae, Soft Scale Insects, Thrips (suppression), and Whiteflies.

site for trees with diameters over 12" or with challenging insect infestations (such as Asian Longhorn Beetle, Citrus Borers, Emerald Ash Borer or Hemlock Woolly Adelgids).

Note: Depending on type of bark, the dosage per injection site may have to be reduced to 0.5 to 1 ml per site and the number of injection sites doubled.

Personal Protective Equipment (PPE)

Use protective eyewear and gloves when handling ArborSystems™ Direct-Inject™ chemicals. Use chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

How to Use ArborSystems™ Direct-Inject™ Chemicals with ArborSystems™ Direct-Inject™ Units

1. Use only ArborSystems' 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. Make Wedge injections within 12" of the ground. Portle™ 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 Wedge™ 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.

Storage and Disposal

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

Pesticide Storage: Store above 65°F in a cool, dry place and in such a manner as to prevent cross contamination with fertilizers, food, feed and other pesticides. Store in original container out of reach of children, preferably in a locked storage area. **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:** {Plastic Bottle:} Triple rinse (or equivalent) then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or by incineration; or if allowed by local authorities, by burning (if burned, stay out of smoke). {Chemical Pack:} Completely empty pack into application equipment, then dispose of empty pack in a sanitary landfill; or by incineration; or if allowed by local authorities, by burning (if burned, stay out of smoke).

Notice of Warranty

ArborSystems 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. ArborSystems 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

ArborSystems™

P.O. Box 34645 Omaha, NE 68134

Toll-Free: 1-800-698-4641 Phone: (402) 339-4459 FAX: (402) 339-5011

www.ArborSystems.com

Pointer™ Insecticide, Wedgle™ Direct-Inject™, Wedgle™ Tip 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

{Bottle Box Label}

POINTER™ Insecticide

ArborSystems™ Direct-Inject™ Chemical

- Easy • No Drilling • No Posting • Saves Time and Money

For Systemic Insect Control in 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 ArborSystems™ Direct-Inject™ Tree Injection Systems

Active Ingredient:

Imidacloprid (CAS No. 138261-41-3) 5%

Other Ingredients 95%

Total 100%

Contains 0.2 oz. (6 grams) active ingredient per 4 fl. oz. (120 ml) bottle [pack].

[Contains 0.05 oz. (1.5 grams) active ingredient per 1 fl. oz. (30 ml) bottle.]

[Contains 1.75 oz. 50 grams active ingredient per 1 qt. 2 fl. oz. (1000 ml) pack.]

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

Net Contents: 4 fl. oz. (120 ml)
[Net Contents: 1 fl. oz. (30 ml) {Sample size}]
[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.

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

Storage and Disposal

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

Pesticide Storage: Store above 65°F in a cool, dry place and in such a manner as to prevent cross contamination with fertilizers, food, feed and other pesticides. Store in original container out of reach of children, preferably in a locked storage area. **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:** {Plastic Bottle:} Triple rinse (or equivalent) then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or by incineration; or if allowed by local authorities, by burning (if burned, stay out of smoke). {Chemical Pack:} Completely empty pack into application equipment, then dispose of empty pack in a sanitary landfill; or by incineration; or if allowed by local authorities, by burning (if burned, stay out of smoke).

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

Sold by

ArborSystems™

P.O. Box 34645 Omaha, NE 68134 www.ArborSystems.com

{Bottle/Pouch Label}

POINTER™ Insecticide

ArborSystems™ Direct-Inject™ Chemical

- Easy • No Drilling • No Posting • Saves Time and Money

For Systemic Insect Control in 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)

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Imidacloprid (CAS No. 138261-41-3)	5%
--	----

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WARNING

See insert for additional precautionary statements and complete Directions for Use.

Net Contents: 4 fl. oz. (120 ml)
[Net Contents: 1 fl. oz. (30 ml) {Sample size}]
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Storage and Disposal

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

Pesticide Storage: Store above 65°F in a cool, dry place and in such a manner as to prevent cross contamination with fertilizers, food, feed and other pesticides. Store in original container out of reach of children, preferably in a locked storage area. **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:** {Plastic Bottle:} Triple rinse (or equivalent) then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or by incineration; or if allowed by local authorities, by burning (if burned, stay out of smoke). {Chemical Pack:} Completely empty pack into application equipment, then dispose of empty pack in a sanitary landfill; or by incineration; or if allowed by local authorities, by burning (if burned, stay out of smoke).

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

Sold by

ArborSystems™

P.O. Box 34645 Omaha, NE 68134 www.ArborSystems.com

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

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

ArborSystems™ Direct-Inject™ Tree Injection Systems

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 and control of most problems is reached in as little as three to five days. Also, because no chemical is lost in non-active wood, the Direct-Inject™ systems allow you to use less chemical to achieve high levels of effectiveness; this saves money and reduces chemical waste. The Direct-Inject™ Systems inject chemicals into a tree with minimal wounding. 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 ArborSystems™ 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.
- Allow multiple or annual treatments without damaging the tree.
- 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 ArborSystems™ Direct-Inject™ Systems are designed to preserve and protect the natural and urban forest. Treat almost any tree in five minutes or less. The 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.

ArborSystems™ Direct-Inject™ chemicals are integral parts of the Direct-Inject™ Tree Injection Systems. Use only ArborSystems' Direct-Inject™ chemicals with the Direct-Inject™ Units. Using unauthorized chemicals with the ArborSystems™ 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 for additional information.

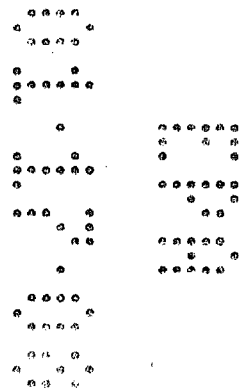
POINTER™ Insecticide

Common name: Merit™

Chemical: Imidacloprid

Merit® is a registered trademark of Bayer Corporation.

{Note: Portle™ may be universally substituted for Wedgle™.}



{Sub-Label B: U.S.D.A. Label}

{Bottle Label – Front Panel}

POINTER™ Insecticide
For Use Only Under U.S.D.A. Supervision with U.S.D.A.-Approved Injection Devices

Active Ingredient:

Imidacloprid (CAS No. 138261-41-3) 5%

Other Ingredients 95%

Total 100%

Contains ____ fl. oz. (____ grams) active ingredient per ____ fl. oz. (____ ml) bottle.

Keep Out of Reach of Children
WARNING
See back panel for First Aid and additional precautionary statements.

Net Contents: ____ (____ ml)

{Net Contents range from 1 quart through 1 gallon}

EPA Reg. No. 69117-1

EPA Est. 69117-NE-1

Sold by

ArborSystems™

P.O. Box 34645

Omaha, NE 68134

www.ArborSystems.com

{Bottle Label – Back Panel}

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Harmful if swallowed, inhaled or absorbed through skin. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear safety glasses. Thoroughly wash with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid

If Swallowed	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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 by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

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

Environmental Hazards

This product is highly toxic to fish and aquatic invertebrates. 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.

Do Not Inject Food Bearing Plants

Personal Protective Equipment (PPE)

Use protective eyewear and gloves when handling this product. Use chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

U.S.D.A. Rate Specifications for Asian and Citrus Longhorned Beetle Programs.

For Use Only Under U.S.D.A. Supervision
For Use with U.S.D.A.-Approved Injection Devices

Read and follow the manufacturers' written documentation on the proper use and maintenance of the injector you are using. The following rates are generally recommended as a function of tree diameter at breast height (DBH).

2 to 23 inches DBH – 4 mL per diameter inch.
24 and greater inches DBH – 8 mL per diameter inch.

General Directions: To determine the initial number of needed injection sites, measure the tree at breast height using a standard forestry tape measure. a) If measuring the circumference, divide this number by six (6) to determine the number of sites needed. b) If measuring the diameter, divide this number by two (2) to determine the number of injection sites needed. c) Initial injector sites should be in the active sapwood, evenly spaced around the tree at the root buttress region and avoiding the root valleys. d) If a single site cannot accept its full dose, that dose may be divided among the other initial injection sites. e) If additional injection sites are needed they may be spaced horizontally or vertically from the initial sites.

The minimum horizontal spacing for injection sites is 3 inches. The minimum vertical spacing for injection sites is 6 inches. Preferably vertical spacing should be staggered and not aligned. Do not apply more than once per calendar year.

Storage and Disposal

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

Pesticide Storage: Store above 65°F in a cool, dry place and in such a manner as to prevent cross contamination with fertilizers, food, feed and other pesticides. Store in original container out of reach of children, preferably in a locked storage area. **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 offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or by incineration; or if allowed by local authorities, by burning; if burned stay out of smoke.

Notice of Warranty

ArborSystems 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. ArborSystems 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

ArborSystems™

P.O. Box 34645 Omaha, NE 68134

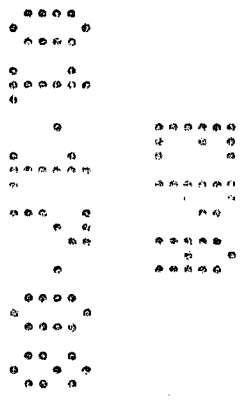
Toll-Free: 1-800-698-4641 Phone: (402) 339-4459 FAX: (402) 339-5011

www.ArborSystems.com

Pointer™ Insecticide, Wedgle™ Direct-Inject™, Wedgle™ Tip 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



{Sub-Label C: Residential Label}

13/15

{Front Panel}

POINTER™ Insecticide
[For] Systemic Insect Control on Landscape Ornamentals and Interior Plantscapes
Tree Injection Convenient Easy-to-Use Pre-measured Doses

Controls [[Choose from Listed Pests]]

{Listed Pests:} Adelgids (including Hemlock Woolly Adelgids), Aphids, Armored Scales (suppression), Asiatic Garden Beetles, Black Vine Weevil Larvae, Chafers, Elm Leaf Beetles, Eucalyptus Longhorned Borer, Flathead Borers (including Alder-Birch Borer, Bronze Birch Borer and Emerald Ash Borer), Japanese Beetles, Japanese Beetle Larvae, Lace Bugs, Leafhoppers, Leafminers, Mealybugs, Oriental Beetles, Pine Bark Beetles, Pine Tip Moth Larvae, Psyllids, Royal Palm Bugs, Sawfly Larvae, Soft Scale Insects, Thrips (Suppression), and Whiteflies

On All Types of Ornamental Trees

DO NOT INJECT FOOD-BEARING PLANTS

Active Ingredient:

Imidacloprid (CAS No. 138261-41-3)	5%
Other Ingredients	95%
Total	100%

Keep Out of Reach of Children
WARNING
See back panel for additional precautionary statements.

{Number} ampoules, Net Contents 0.036 fl. oz. each, ____ fl. oz. total

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

{ArborSystems Logo}

{Monterey Logo}

{Back Panel}

Sold by
ArborSystems™
Omaha, NE 68134
Pointer™ Insecticide is a trademark of
ArborSystems

Distributed for ArborSystems by
Monterey Lawn & Garden Products, Inc.
Fresno, CA 39745 (559) 499-2100
www.montereylawnandgarden.com

DIRECTIONS FOR USE

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

Personal Protective Equipment (PPE):

Use safety glasses and gloves when handling this product. Use chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

General Information
Tree Insecticide Injectors

Do Not Inject to Food-Bearing Plants

This product contains an insecticide that is injected into holes drilled into the tree trunk at the flare of the tree. The pre-measured doses are convenient and easy to use. The insecticide controls Adelgids (including Hemlock Woolly Adelgids), Aphids, Armored Scales (suppression), Asiatic Garden Beetles, Black Vine Weevil Larvae, Chafers, Elm Leaf Beetles, Eucalyptus Longhorned Borer, Flathead Borers (including Alder-Birch Borer, Bronze Birch Borer and Emerald Ash Borer), Japanese Beetles, Japanese Beetle Larvae, Lace Bugs, Leafhoppers, Leafminers, Mealybugs, Oriental Beetles, Pine Bark

Beetles, Pine Tip Moth Larvae, Psyllids, Royal Palm Bugs, Sawfly Larvae, Soft Scale Insects, Thrips (Suppression), and Whiteflies on all types of ornamental trees.

Timing of Injections:

Inject trees anytime during the growing season. Treatments are more effective when made early in the growing season. Injections to conifers may be either slow in uptake or have no uptake at all.

{Illustration of measuring tree}	{Illustration of tree and drilling hole}	{Illustration of product application}
<p>Tools: Tape measure and drill with 1/4" diameter drill bit.</p> <p>Dosage: Measure the circumference of the tree trunk within 12" of the ground. You will need one ampoule (0.036 fl. oz.) for every four inches of circumference.</p>	<p>Instructions: Drill 1/2" to 1/4" deep holes into the tree at the base of the tree. Drill the holes at a downward slant (about 45°). Evenly space the holes around the tree. Use only a clean, sharp drill bit. Brad point drill bits are best.</p>	<p>Cut off the tip and squeeze the chemical into the holes. Use one ampoule for each hole.</p> <p>Wait for some of the chemical to be absorbed by the tree before emptying the entire ampoule.</p>

Note: Holes drilled in a tree are wounds. Do not drill holes in a tree more than once a year or more than two consecutive years.

[Storage and Disposal]
<p>Storage: Store above 65°F in a cool, dry place and in such a manner as to prevent cross contamination with fertilizers, food, feed and other pesticides. Store in original container out of reach of children, preferably in a locked storage area.</p> <p>Disposal: If empty, do not reuse ampoules. Place in trash or offer for recycling if available. If partly filled, call your local solid or household waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.</p>

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Harmful if swallowed, inhaled or absorbed through skin. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear safety glasses. Thoroughly wash with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid

If Swallowed	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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 by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

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

Environmental Hazards

This product is highly toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters. This product is highly toxic to bees exposed to direct treatment or residues on blooming plants or weeds. Do not apply this product to blooming plants or weeds if bees are visiting the treatment area.

Notice of Warranty

ArborSystems 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. ArborSystems does not make, or authorize any agent or representative to make, any other warranty, guarantee or representation, express or implied, concerning this product.

{Ampoule Label}

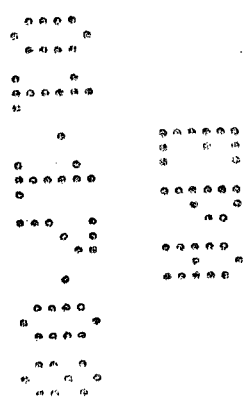
Pointer Insecticide

Active Ingredient:	
Imidacloprid*	5%
Other Ingredients	95%
Total	100%
*CAS No. 138261-41-3	

KEEP OUT OF REACH OF CHILDREN

WARNING

See card for
 Precautionary Statements
 and Directions for Use.
 Net Contents 0.036 oz.
 EPA Reg. No. 69117-1
 EPA Est. 54292-IL-1
 Sold By
 ArborSystems
 Omaha, NE 68134



[] Denotes alternate/optional language
 { } Denotes language that does not appear on the market labeling