

69117-1

04/10/2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

APR 10 2009

Subject: Label Notification
EPA Registration No. 69117-1

Dear Ms. Davis:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated March 26, 2009 for the product Pointer Insecticide. 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 703-306-0415.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", with a long horizontal stroke extending to the right.

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060.

| | | |
|--|--|--|
| United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001 | <input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other | OPP Identifier Number <h2 style="text-align: center;">Notification</h2> |
|--|--|--|

Application for Pesticide – Section I

| | | |
|--|--|--|
| 1. Company/Product Number EPA Reg. No. 69117-1 | 2. EPA Product Manager Venus Eagle | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/ Product (Name) POINTER® Insecticide | PM # 1 | |
| 5. Name and Address of Applicant (Include ZIP Code) ArborSystems, Inc. c/o RegWest Company, LLC 30856 Rocky Road Greeley, CO 80631-9375 <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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below. |
|--|---|

NOTIFICATION

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

APR 10 2009

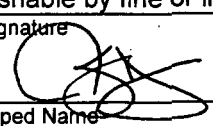
Submit label revision notification per PR Notice 98-10.
Refer to the Reference Label for an illustration of all label revisions
(revisions related primarily to a change in container/packaging components).

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR § 152.45, 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 U.S.C. 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 I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

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 Wt. No. Per Container | If "Yes" Packaging Wt. No. Per Container |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container 4 fl oz (120 ml) and 1 qt 2 fl oz (1000 ml) | |
| | | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input type="checkbox"/> Paper glued <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 Kim Davis, CC, APC, Manager | Title Consultant/Agent | Telephone No. (Include Area Code) (970) 353-0611 kim@regwest.com |
| Certification | | 6. Date Application Received |
| 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. | | <input checked="" type="checkbox"/> (Stamped) |
| 2. Signature  | 3. Title Consultant/Agent | RECEIVED APR 10 2009 |
| 4. Typed Name Kim Davis, CC, APC, Manager | 5. Date March 26, 2009 | |

March 26, 2009



Ms. Linda Arrington
Document Processing Desk – **NOTIF**
Office of Pesticide Programs – **7504P**
U.S. Environmental Protection Agency
2777 South Crystal Drive
One Potomac Yard, Room S-4900
Arlington, VA 22202

Dear Ms. Arrington:

Subject: ArborSystems, Inc.
Pointer® Insecticide
EPA Reg. No. 69117-1

On behalf of **ArborSystems, Inc.**, RegWest Company, LLC is submitting the attached materials as notification of a label revision for subject product. RegWest will act as sole agent in this endeavor.

Attached are the following:

1. Application for Pesticide: Other (Notification)
2. One **Reference Label** (illustrating the revisions)
3. Two **New Labels** (incorporating the revisions)
4. Two sets of market labels

We are making several revisions to the labeling, primarily due to a change in packaging concepts. The previous packaging/container concepts were:

- For the 4 fl oz (120 ml) size: a box containing a chemical bottle (with reduced labeling) and an insert
- For the 1 qt 2 fl oz (1000 ml) size: a box containing a pouch.

The attached labeling reflects the current container concepts which are:

- For the 4 fl oz (120 ml) size: a collapsible pouch sealed in a closed plastic canister (i.e., the "pack"), which is then put in an outer box
- For the 1 qt 2 fl oz (1000 ml) size: a collapsible pouch in a sealed box (i.e., the "pack") which is then put in an outer box.

The 4 fl oz pack now has a booklet (instead of an insert) affixed to the canister and an outer box label (with reduced labeling). When used to inject chemical into trees, the pack is removed from the outer box and installed onto the delivery device. The 1 qt 2 fl oz pack now has a full label on the box (the pouch cannot be removed from the box without destroying the box) and an outer box label (with reduced labeling). The box has a connective tube. When used to inject chemical into trees, the pack is removed from the outer box and the tube is connected to the delivery device.

Please refer to the **Reference Label** for a complete illustration of all label revisions.

Please contact me at (970) 353-0611 or kim@regwest.com if you require additional information or have any questions.

Regards,
RegWest Company, LLC

Kim Davis, CC, APC, Manager
Consultant/Agent

Attachments

cc: ASI - Doolittle, C.

30856 Rocky Road
Greeksy, CO 80631-9375
970-353-0611
970-353-0613 Fax
Kim@regwest.com

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POINTER® Insecticide

{Sub-Label A: Commercial Label}

NOTIFICATION

{Affixed Booklet – Front Panel}

APR 10 2009

POINTER® Insecticide
An ArborSystems™ Direct-Inject™ Chemical

For systemic insect control in a wide variety of ornamental trees in utility rights-of-way, urban environments, residential areas and interior landscapes.

Active Ingredient:

| | |
|--|-------------|
| Imidacloprid (CAS No. 138261-41-3) | 5% |
| Other Ingredients | <u>95%</u> |
| Total | <u>100%</u> |

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

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

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

{Affixed Booklet}

POINTER® Insecticide
An ArborSystems™ Direct-Inject™ Chemical
• Easy • No Drilling • 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, foresters, grounds maintenance professionals and landscapers.

To be used only with the ArborSystems Direct-Inject Tree Injection System.

ArborSystems™
The No-Drill Injection Solution
800-698-4641 • Fax: 402-339-5011
P.O. Box 34645 • Omaha, NE 68134

Net Contents: 4 fl. oz. (120 ml)
EPA Reg. No. 69117-1 • EPA Est. 69117-NE-1

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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. 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, foresters, grounds maintenance professionals and landscapers.

Information

Do not inject food bearing plants.

ArborSystems™ Direct-Inject™ Tree Injection System

The ArborSystems Direct-Inject Tree Injection System is 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 (the active vascular system) of the tree. 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. This system minimizes wounding and promotes long-term tree vigor.

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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 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. | 1 ml per 4" to 6" 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" 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 Tree Injection System

1. Use only ArborSystems Direct-Inject chemicals with your unit as they have been formulated specifically for the Direct-Inject system. Use of other chemicals will invalidate warranty.
2. Attach the chemical 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 in this booklet 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 Wedgle® Tip injections within 12" of the ground. Portle® Tip injection height varies depending on type of tree and location.
7. With a smooth motion, firmly squeeze the injection unit handles. This releases a pre-measured chemical dose into the tree.
8. Continue making injections moving around the tree until the entire tree trunk has been treated.
9. 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 original 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: Completely empty pack into application equipment, then dispose of empty pack in a sanitary landfill; or if allowed by local authorities, by burning (if burned, stay out of smoke).

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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.

ArborSystems™
The No-Drill Injection Solution
800-698-4641 • Fax: 402-339-5011
P.O. Box 34645 • Omaha, NE 68134

Pointer® Insecticide, Portle® and Wedgle® are registered trademarks of ArborSystems.
ArborSystems™, Direct-Inject™ and WedgeChek™ are trademarks of ArborSystems.
Direct-Inject™ unit is protected by U.S. Patent #5,901,498
Wedge™ Tip is protected by U.S. Patent #5,239,773
WedgeChek™ is protected by U.S. Patent #5,797,215
Portle® Tip is protected by U.S. Patent #7,178,286

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

{Box Label}

POINTER® Insecticide
An ArborSystems™ Direct-Inject™ Chemical

For systemic insect control in a wide variety of ornamental trees in utility rights-of-way, urban environments, residential areas and interior plantscapes.

For use by professional arborists/applicators, foresters, grounds maintenance professionals, and landscapers.

To be used only with the ArborSystems Direct-Inject Tree Injection System

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) pack.

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

Net Contents: 4 fl. oz. (120 ml)
EPA Reg. No. 69117-1 • EPA Est. 69117-NE-1

DIRECTIONS FOR USE

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

The ArborSystems Direct-Inject units are designed to be used only with ArborSystems pre-packed chemicals. Tampering with packs or contents may cause non-warranted damage to your injection system.

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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 original 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: Completely empty pack into application equipment, then dispose of empty pack in a sanitary landfill; or if allowed by local authorities, by burning (if burned, stay out of smoke).

ArborSystems™

The No-Drill Injection Solution

800-698-4641 • Fax: 402-339-5011
P.O. Box 34645 • Omaha, NE 68134

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

{Pack Label}

POINTER® Insecticide
An ArborSystems™ Direct-Inject™ Chemical

For systemic insect control in a wide variety of ornamental trees in utility rights-of-way, urban environments, residential areas and interior landscapes.

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) pack.

[Contains 1.8 oz. (50.1 grams) active ingredient per 1 qt. 2 fl. oz. (1000 ml) pack.]

Keep Out of Reach of Children

WARNING

See booklet [box label] for additional precautionary statements and complete Directions for Use.

DIRECTIONS FOR USE

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

The ArborSystems Direct-Inject units are designed to be used only with ArborSystems pre-packed chemicals. Tampering with 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 above 65°F in original 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: Completely empty pack into application equipment, then dispose of empty pack in a sanitary landfill; or if allowed by local authorities, by burning (if burned, stay out of smoke).

9/20

Net Contents: 4 fl. oz. (120 ml)
[Net Contents: 1 qt. 2 fl. oz. (1000 ml)]
EPA Reg. No. 69117-1 • EPA Est. 69117-NE-1

ArborSystems™
The No-Drill Injection Solution
800-698-4641 • Fax: 402-339-5011
P.O. Box 34645 • Omaha, NE 68134

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

{1 qt 2 fl oz box label – front panel}

POINTER® Insecticide
An ArborSystems™ Direct-Inject™ Chemical
• Easy • No Drilling • 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, foresters, grounds maintenance professionals and landscapers.

To be used only with the ArborSystems Direct-Inject Tree Injection System

Active Ingredient:

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

Contains 1.8 oz. (50.1 grams) active ingredient per 1 qt. 2 fl. oz. (1000 ml) pack.

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

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. 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.

Pointer® Insecticide, Portle® and Wedgle® are registered trademarks of ArborSystems.

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

Direct-Inject™ unit is protected by U.S. Patent #5,901,498

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

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

Portle® Tip is protected by U.S. Patent #7,178,286

ArborSystems™

The No-Drill Injection Solution

800-698-4641 • Fax: 402-339-5011

P.O. Box 34645 • Omaha, NE 68134

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

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

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{1 qt 2 fl oz box label – side panel}

How to Use ArborSystems Direct-Inject Chemicals with ArborSystems Direct-Inject Tree Injection System

1. Use only ArborSystems Direct-Inject chemicals with your unit as they have been formulated specifically for the Direct-Inject system. Use of other chemicals will invalidate warranty.
2. Attach the chemical 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 label 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 Wedgle® Tip injections within 12" of the ground. Portle® Tip injection height varies depending on type of tree and location.
7. With a smooth motion, firmly squeeze the injection unit handles. This releases a pre-measured chemical dose into the tree.
8. Continue making injections moving around the tree until the entire tree trunk has been treated.
9. During use, periodically clean the Direct-Inject unit to prevent clogging.

{1 qt 2 fl oz box label – back panel}

DIRECTIONS FOR USE

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

Information

Do Not Inject Food Bearing Plants

ArborSystems™ Direct-Inject™ Tree Injection System

The ArborSystems Direct-Inject Tree Injection System is 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 (the active vascular system) of the tree. 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. This system minimizes wounding and promotes 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 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. | 1 ml per 4" to 6" 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" 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.

Storage and Disposal

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

Pesticide Storage: Store above 65°F in original 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: Completely empty pack into application equipment, then dispose of empty pack in a sanitary landfill; or if allowed by local authorities, by burning (if burned, stay out of smoke).

ArborSystems™

The No-Drill Injection Solution

800-698-4641 • Fax: 402-339-5011

P.O. Box 34645 • Omaha, NE 68134

[] Denotes alternate/optional language

{ } Denotes language that does not appear on the market labeling

{Additional Selling/Marketing Copy}

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.

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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.

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{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

{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. |

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First Aid (continued)

| | |
|--|---|
| 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.

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.

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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:** 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

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

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{Sub-Label C: Residential Label}

{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% |

| |
|---|
| <p>Keep Out of Reach of Children WARNING See back panel for additional precautionary statements.</p> |
|---|

{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

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

Pointer™ Insecticide is a trademark of ArborSystems

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.

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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 update 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]

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. **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.

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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. |
| <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

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.

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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