

69117-1

06-04-2009

1/15



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

JUN 4 2009

Dear Ms. Davis:

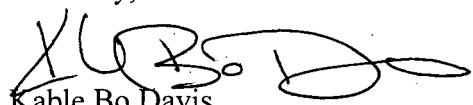
Subject: Labeling Amendment; Response to Agency letter dated September 30, 2008  
Pointer Insecticide  
EPA Registration No. 69117-1  
Submission Date: January 28, 2009

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

1. On page 12 of the label, revise "*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.*" to read "*Because the chemical is placed right where the tree can use it, effectiveness of the chemical is increased and control of most problems can start to be seen in as little as three to five days.*"
2. On page 12 of the label, delete the statement "*The Direct-Inject System is among the most efficient chemical delivery systems available.*" Statements such as this cannot be qualified. However, statements such as "*The Direct-Inject System is an efficient chemical delivery system.*" are acceptable.
3. It is recommended that you include within the First Aid sections of the label an emergency contact number. You may wish to include the contact number for the National Pesticide Information Center (NPIC). That number is 800 858-7378. In addition, it is recommended that the First Aid sections of the label be modified into a tabular format
4. In review of the company's website ([www.arborsystems.com](http://www.arborsystems.com)), multiple unacceptable claims were found. As stated in the Agency letter dated September 30, 2008, all "curative" and "2 year control claims must be deleted. This request was also addressed in Agency review dated September 5, 2008 (D355995) and was discussed within the November 20, 2008 meeting between ArborSystems Inc. and the Agency. If the above referenced claims are not removed from the website, we will be forced to turn this action over to enforcement.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact me at (703) 306-0415.

Sincerely,



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

Enclosure- Stamped Labeling

# POINTER<sup>®</sup> Insecticide

{4 fl. oz (120 ml) Container}

*(Collapsible Pouch Label)*

## POINTER<sup>®</sup> Insecticide

<b>Active Ingredient:</b>	
Imidacloprid (CAS No. 138261-41-3) .....	5%
<b>Other Ingredients</b> .....	95%
<b>Total</b> .....	100%

### Keep Out of Reach of Children WARNING

See booklet or box for First Aid, additional precautionary statements and complete Directions for Use.  
EPA Reg. No. 69117-1 • EPA Est. 69117-NE-1

*(Booklet - Front Panel)*

## POINTER<sup>®</sup> Insecticide An ArborSystems<sup>™</sup> Direct-Inject<sup>™</sup> Chemical

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

<b>Active Ingredient:</b>	
Imidacloprid (CAS No. 138261-41-3) .....	5%
<b>Other Ingredients</b> .....	95%
<b>Total</b> .....	100%

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.

**ACCEPTED  
WITH COMMENTS  
In EPA Letter Dated:**

*(Booklet Page 1)*

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

JUN 4 2009  
**Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
69117-1**

### 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  
Wedgle® 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

*{Booklet Page 2}*

### **POINTER® Insecticide DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.  
**Intended for use by professional arborists/applicators, foresters, grounds maintenance professionals and landscapers.**

**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 remedial (on trees already showing symptoms of infestation), apply as needed spring through fall, provided the bark is pliable enough to accept the chemical injections.

*{Booklet Page 3}*

#### **Dosage**

1 ml per 4" to 6" of trunk circumference measured within 12" of the ground.

Dosage may be increased to a maximum of 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:** Younger or small trees with thinner bark may be less able to retain the full dose per injection site; in such cases, to obtain the appropriate per-tree dosage, reduce the dosage per injection site to 0.5 to 1 ml and increase the number of injection sites accordingly.

**Pests Controlled**

- 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)
- Whiteflies

*(Booklet Page 4)*

**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 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. When treating hardwoods, use Wedgle® Tips and make injections within 12" of the ground. Initially, use the shorter Wedgle Tip; if no resistance is met after this initial insertion past the bark (i.e., if the tip does not reach the outer xylem ring), withdraw the Tip. Replace the short Tip with the longer Tip to ensure the Tip fully penetrates the bark to reach the outer xylem ring. Use Portle® Tips when treating conifers and Palm Tips when treating palms.
8. When the Tip is correctly inserted, firmly squeeze the injection unit handles using a smooth, slow motion. This releases a pre-measured chemical dose into 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.

*{Booklet Page 5}*

### **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:** Non-refillable container; do not reuse or refill this container. Completely empty pack into application equipment, then offer for recycling if available; otherwise dispose of empty pack in a sanitary landfill.

**{Graphic} Store Above 65°F**

*{Booklet Pages 6-7}*

### **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 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).

**Intended 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

**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:** 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:** 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:** 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:** 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.**

**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.

---

*(Cylinder 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.

Intended 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

**ArborSystems™**

**The No-Drill Injection Solution**

800-698-4641 • Fax: 402-339-5011

P.O. Box 34645 • Omaha, NE 68134

**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:** Non-refillable container; do not reuse or refill this container. Completely empty pack into application equipment, then offer for recycling if available; otherwise dispose of empty pack in a sanitary landfill.

{Graphic} Store Above 65°F

*(Outer Box Label)*

**POINTER® Insecticide**

**An ArborSystems™ Direct-Inject™ Chemical**

**POINTER® Insecticide**

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.



5/9

**Keep Out of Reach of Children**  
**WARNING**  
See Booklet 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**

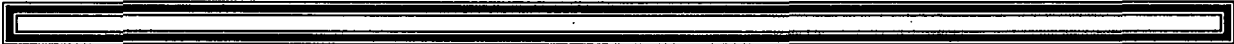
Do not contaminate water, food or feed by storage or disposal.

**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:** Non-refillable container; do not reuse or refill this container. Completely empty pack into application equipment, then offer for recycling if available; otherwise dispose of empty pack in a sanitary landfill.

{Graphic} Store Above 65°F

Net Contents: 4 fl. oz. (120 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



**{1 qt. 2 fl. oz (1000 ml) Container}**

*(Collapsible Pouch Label)*

**POINTER® Insecticide**

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

**Keep Out of Reach of Children**  
**WARNING**

See booklet or box for First Aid, additional precautionary statements and complete Directions for Use.  
EPA Reg. No. 69117-1 • EPA Est. 69117-NE-1



13  
15

*{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 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).

**Intended 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%
<b>Other Ingredients</b> .....	<b>95%</b>
<b>Total</b> .....	<b>100%</b>

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:** 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:** 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:** 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:** 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.

#### **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.

#### **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**

---

*(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. When treating hardwoods, use Wedgle® Tips and make injections within 12" of the ground. Initially, use the shorter Wedgle Tip; if no resistance is met after this initial insertion past the bark (i.e., if the tip does not reach the outer xylem ring), withdraw the Tip. Replace the short Tip with the longer Tip to ensure the Tip fully penetrates the bark to reach the outer xylem ring. Use Portle® Tips when treating conifers and Palm Tips when treating palms.
8. When the Tip is correctly inserted, firmly squeeze the injection unit handles using a smooth, slow motion. This releases a pre-measured chemical dose into the tree.
9. Continue making injections moving around the tree until the entire tree trunk has been treated.

12  
15

10. During use, periodically clean the Direct-Inject unit to prevent clogging.

*(Box Label - Back Panel)*

## **POINTER® Insecticide**

### **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.**

#### **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 remedial** (on trees already showing signs of infestation), apply as needed spring through fall, provided the bark is pliable enough to accept the chemical injections.

#### **Dosage**

1 ml per 4" to 6" of trunk circumference measured within 12" of the ground.

Dosage may be increased to a **maximum** of 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:** Younger or small trees with thinner bark may be less able to retain the full dose per injection site; in such cases, to obtain the appropriate per-tree dosage, reduce the dosage per injection site to 0.5 to 1 ml and increase the number of injection sites accordingly.

#### **Pests Controlled**

- |  |   |                        |
|--|---|------------------------|
| • Adelgids (including Hemlock Woolly Adelgids)                                       | • Chafers   | • Leafminers           |
| • Aphids   | • Elm Leaf Beetles  | • Mealybugs            |
| • Armored Scales (suppression)   | • Eucalyptus Longhorned Borer   | • Oriental Beetles     |
| • Asiatic Garden Beetles   | • Flatheaded Borers (including Alder-Birch Borer, Bronze Birch Borer and Emerald Ash Borer) | • Pine Bark Beetles    |
| • Bark Beetles (including Asian Longhorned Beetle, Citrus Longhorned Beetle and IPS) | • Japanese Beetles  | • Pine Tip Moth Larvae |
| • Black Vine Weevil Larvae   | • Japanese Beetle Larvae  | • Psyllids             |
|  | • Lacebugs  | • Royal Palm Bugs      |
|  | • Leafhoppers   | • Sawfly Larvae        |
|  |   | • Soft Scale Insects   |
|  |   | • Thrips (suppression) |
|  |   | • Whiteflies           |

13  
15

**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:** Non-refillable container; do not reuse or refill this container. Completely empty pack into application equipment, then offer for recycling if available; otherwise dispose of empty pack in a sanitary landfill.

{Graphic} Store Above 65°F

{Outer Box Label}

**POINTER® Insecticide**  
An ArborSystems™ Direct-Inject™ Chemical

**POINTER® Insecticide**

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

<b>Active Ingredient:</b>	
Imidacloprid (CAS No. 138261-41-3) .....	5%
<b>Other Ingredients</b> .....	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 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:** Non-refillable container; do not reuse or refill this container. Completely empty

pack into application equipment, then offer for recycling if available; otherwise dispose of empty pack in a sanitary landfill.

{Graphic} Store Above 65°F

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 intended to clarify or describe label elements and will 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 System**

The ArborSystems Direct-Inject Tree Injection System is 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 system allows you to use less chemical to achieve high levels of effectiveness; this saves money and reduces chemical waste. The Direct-Inject System injects 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 System:

- Minimizes wounding to keep out fungi, bacteria, and insects.
- Prevents 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.
- Allows multiple or annual treatments without damaging the tree.
- Requires no drills, power supply or other bulky equipment.

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

The ArborSystems Direct-Inject System is designed to preserve and protect the natural and urban forest. Treat almost any tree in five minutes or less. The Direct-Inject System is 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 System. Use only ArborSystems' Direct-Inject chemicals with the Direct-Inject Units. Using unauthorized chemicals with the ArborSystems Direct-Inject System constitutes a violation of Federal law.

**Chemical Selection**

Your distributor can advise you on the best chemical selections for trees in your area.

**POINTER® Insecticide**

Common name: Merit™

Chemical: Imidacloprid

Merit® is a registered trademark of Bayer Corporation.

---