



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 22, 2022

Kim Davis
Consultant
RegWest Company LLC
9017 18th Street
Greeley, CO 80634

Subject: Label Amendment – Updating first aid, added hemiptera insects
Product Name: Pointer Insecticide
EPA Registration Number: 69117-1
Application Date: 8/18/2017
Decision Number: 535110

Dear Ms. Davis

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Scott Campbell at
Campbell.Scott@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Campbell". The signature is fluid and cursive, with the first name "Scott" and last name "Campbell" clearly distinguishable.

sc Venus Eagle, Product Manager 01
Invertebrate and Vertebrate Branch 3
Registration Division (7505T)
Office of Pesticide Programs

Enclosure

POINTER® Insecticide

{Collapsible Pouch Label (PT_TAG) – used for both sizes}

POINTER® Insecticide

Active Ingredient:

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

Other Ingredients 95%

Total 100%

Net Contents: 4 fl oz (120 ml) Contains 0.2 oz (6 grams) active ingredient per 4 fl oz (120 ml) pack.
Net Contents: 1 qt 2 fl oz (1000 ml) Contains 1.8 oz (50.1 grams) active ingredient per 1 qt 2 fl oz (1000 ml) pack.

Lot. No.

Keep Out of Reach of Children WARNING

See booklet for First Aid, additional Precautionary Statements and complete Directions for Use.
EPA Reg. No. 69117-1 • EPA Est. 69117-NE-1

{Booklet (PT_BK) – used for both sizes}

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.

Active Ingredient:

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

Other Ingredients 95%

Total 100%

**Keep Out of Reach of Children
WARNING**

See inside for First Aid, additional Precautionary Statements and complete Directions for Use.

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, 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.



Tree Injection Solutions

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

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

First Aid

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.

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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. 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.

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 > 14 mils, nitrile rubber > 14 mils, neoprene rubber > 14 mils, polyethylene or Viton > 14 mils.

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 foraging the treatment area.



Tree Injection Solutions

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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.

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

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.

[Do not apply this product by any application method to linden, basswood or other *Tilia* species in the State of Oregon.]

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.

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 Longhorned 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)
- Hemiptera insects such as Aphids, Leafhoppers, Planthoppers and Spotted Lantern Fly
- 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

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.

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.



{Cylinder Label (PT_PL) – only 4 fl oz container}

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 First Aid, 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

Lot. No.




Tree Injection Solutions

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. |
|  |

{Outer Box Label (PT_PXL) (PT_1MS) – used for both sizes}

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.

| | | |
|---|--|------|
| 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.] | | |

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| Keep Out of Reach of Children WARNING See Booklet for First Aid, additional Precautionary Statements and complete Directions for Use. |
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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. |
|  |

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



Tree Injection Solutions

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[] Denotes alternate/optional language

{ } Denotes language intended to clarify or describe label elements and will not appear on the market labeling

{Below are 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 can start to be seen 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.

Chemical packs 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 non-food bearing/ornamental tree in five minutes or less. The Direct-Inject System is an efficient chemical delivery system. 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.