

69117-2

7-14-2003

1-9

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 checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number <h1 style="text-align: center;">299461</h1>
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Application for Pesticide – Section I

1. Company/Product Number EPA Reg. No. 69117-2	2. EPA Product Manager Thomas C. Harris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/ Product (Name) Greyhound Insecticide	PM #	
5. Name and Address of Applicant (Include ZIP Code) ArborSystems LLC c/o RegWest Company, LLC 30856 Rocky Road Greeley, CO 80631-9375	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 _____	
<input type="checkbox"/> Check if this is a new address		

Section – II

<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input 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
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)


JUL 14 2003

**Submit revised labeling primarily to add marketing/selling copy and Mites.
All changes are illustrated on the attached Reference Label**

Section – III

1. Material This Product Will Be Packaged In:						2. Type of Container	
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				<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
*Certification must be submitted		If "Yes" Unit Packaging Wgt.	No. Per Container	If "Yes" Packaging Wgt.	No. Per Container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4 ounces		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"/> Paper glued		<input type="checkbox"/> Stenciled <input type="checkbox"/> Other Self-adhesive label (on printed box) with insert			

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) (470) 353-0611
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.		6. Date Application Received (Stamped)
2. Signature 	3. Title Consultant/Agent	
4. Typed Name Kim Davis, CC, APC, Manager	5. Date June 19, 2003	

3-9

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number 299461
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Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name)	PM#	
5. Name and Address of Applicant (Include ZIP Code) <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"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

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 If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	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) _____
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* Certification must be submitted

3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	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"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name	Title	Telephone No. (include Area Code)
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Certification 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.	b. Date Application Received (Stamped)
2. Signature	3. Title
4. Typed Name	5. Date

{Box Label}

GREYHOUND™ Insecticide

For Systemic Insect Control on Landscape Ornamentals and Interior Plantscapes
For the Treatment of Woody Trees and Shrubs for the Control of Elm Leaf Beetles, Lace Bugs and Mites
For Use by Professional Arborists/Applicators with the ArborSystems™ Wedgle™ Direct-Inject™
Tree Injection [Treatment] System

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

Active Ingredient:

Abamectin (CAS Nos. 65195-56-4 and 65195-55-3) 2%

Other Ingredients 98%

Total 100%

Contains 0.0047 pound Abamectin per 4 oz. bottle

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

NOTIFICATION

JUL 14 2003

Net Contents 4 oz. (120 ml)

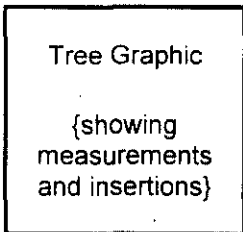
DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Refer to insert for complete Directions for Use

ArborSystems™ Wedgle™ Direct-Inject™ Tree Injection [Treatment] System SW 100 Injector Gun is designed to be used only with ArborSystems pre-bottled chemicals. Tampering with bottles or contents may cause non-warranted damage to your injection [treatment] system,

How to Figure Number of Injection Sites

Be sure to follow the directions on the insert to determine how many 1-ml injection sites are needed on any given tree.



Usually this is approximately one injection* for every 4" to 6" of trunk circumference measured at 4.5' above the ground. Make WedgeChek™ insertions evenly spaced around the flare of the tree.

*Depending on type of bark, the dosage per injection site may have to be reduced to ½ ml per site and the number of injection sites doubled.

Storage and Disposal

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

Storage: Store in a tightly closed container in a cool, dry place. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Sold by]
ArborSystems™
Omaha, NE 68134
www.arborsystems.com

{Container Label}

GREYHOUND™ INSECTICIDE

**For Systemic Insect Control on Landscape Ornamentals and Interior Plantscapes
For the Treatment of Woody Trees and Shrubs for the Control of Elm Leaf Beetles, Lace Bugs and Mites
For Use by Professional Arborists/Applicators with the ArborSystems™ Wedgle™ Direct-Inject™
Tree Injection [Treatment] System**

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

Active Ingredient:

Abamectin (CAS Nos. 65195-56-4 and 65195-55-3)	2%
Other Ingredients	98%
Total	100%

Contains 0.0047 pound Abamectin per 4 oz. bottle

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

Net Contents 4 oz. (120 ml)

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Storage and Disposal

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

Storage: Store in a tightly closed container in a cool, dry place. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. **Never place unused product down any indoor or outdoor drain.**

EPA Reg. No. 69117-2

EPA Est. 69117-NE-1

[Sold by]
ArborSystems
Omaha, NE 68134
www.arborsystems.com

5-9

{Insert Label}

GREYHOUND™ INSECTICIDE

**For Systemic Insect Control on Landscape Ornamentals and Interior Plantscapes
For the Treatment of woody Trees and Shrubs for the Control of Elm Leaf Beetles, Lace Bugs and Mites
For Use by Professional Arborists/Applicators with the ArborSystems™ Wedgle™ Direct-Inject™
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Active Ingredient:

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Total 100%

Contains 0.0047 pound Abamectin per 4 oz. bottle

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

EPA Reg. No. 69117-2

EPA Est. 69117-NE-1

[Sold by]

ArborSystems

Omaha, NE 68134

www.arborsystems.com

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Prolonged or frequently repeated exposure may cause allergic skin reactions in some individuals. Harmful if inhaled or absorbed through the skin. Avoid contact with skin. May be fatal if swallowed. Use protective eyewear and rubber or neoprene gloves. Remove contaminated clothing and wash before reuse. Thoroughly wash with soap and water after handling and before eating, drinking or using tobacco.

First Aid

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.
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 Swallowed	<ul style="list-style-type: none"> • Immediately give one or two glasses of water and induce vomiting by gently touching back of the throat with finger. • Immediately call a poison control center or doctor for treatment advice. • Do not induce vomiting or 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-698-4641 for emergency medical treatment information.

Note to Physician: Early signs of intoxication include mydriasis (dilated pupils), ataxia (unsteadiness) and muscle tremors. Toxicity following accidental ingestion of this product can be minimized by inducing vomiting within one half hour of exposure. If toxicity from exposure has progressed to cause severe vomiting the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given along with other required supportive measures (such as maintenance of blood pressure levels) as indicated by clinical signs, symptoms and measurements. In severe cases, observations should continue for at least several days until the clinical condition is stable and normal. Since abamectin is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic abamectin exposure.

{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 toxic to fish and wildlife. Do not apply directly to water. Do not contaminate water when disposing of equipment wash water or rinsate. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops. Do not apply this product to blooming crops if bees are visiting the treatment area.

Physical or Chemical Hazards

Do not use or store near heat or open flame.

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

GENERAL INFORMATION

Do not use on crop-bearing trees.

ArborSystems™ Wedgle™ Direct-Inject™ Tree Injection [Treatment] System using the patented Wedgle™ Tip and WedgeChek™

The injection system is easy. Most trees can be treated in as little as five minutes allowing arborists/applicators to treat trees quickly. Commercial operators will make more money, handle more business and create more satisfied customers while ground maintenance crews are more productive, more confident and have greater peace of mind. May be used in sunny or overcast conditions. Each system weighs just three pounds and the hassle of hauling around extra equipment and larger amounts of chemical is eliminated. Everything about this system is more efficient and operators will be up and running in just 15 minutes.

With no holes to drill, long term wounding is prevented and by injecting chemicals into the cambial area without introducing air, pathogens are not allowed into the tree and potential decay never starts. After 120 injections 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. Chemicals are injected directly into the tree.

Ready-to-use containers require no mixing. Self-sealing bottles are easy to use, easy to store. Saves money – the efficient Wedgle™ Direct-Inject™ system requires less chemical to achieve control. Easy-to-use closed system is fast and efficient.

The injection system is effective. Wedge-shaped needles inject chemical into the active layer of the tree. Because of this, not only is the effectiveness of the chemical increased, control of most problems is reached in as little as two to five days. The Wedgle also means less chemical used, less chemical purchased and less time spent in each area without having to worry about the quality of your work. Whether you use your system as a preventative, concerned about potential problems, or you're using an IPM approach, needing a curative for definite results, you will have season control with one easy application.

Quicker and more efficient use of your time and resources. Start using tomorrow's technology on the trees you're treating today, with the world's most effective tree injection system: the Wedgle Direct-Inject™ Injection [Treatment] System by ArborSystems. It's right for the trees. Minimizes wounding, promotes tree vigor. The Wedgle™ Direct-Inject™ System requires no drilling or implants. Treat trees in the most non-invasive, tree-friendly way possible. Immediate uptake provides control in two to five days. The Wedgle™ Direct-Inject™ System: protects the tree's vascular system; prevents air from getting into the tree; minimizes wounding to keep out fungi, bacteria and insects; allows retreatment year after

year; injects chemical through the bark without drilling into sapwood; places chemicals at the outer edge of the xylem – a tree's most active transplant layer; protects the tree's sapwood (the active vascular system) from damage resulting from the introduction of air, assuring proper water and nutrient movement and food storage; requires less chemical because all the chemical is placed where the tree can use it; allows annual treatments with virtually no damage.

The ArborSystems™ Wedgle™ Direct-Inject™ Tree Injection [Treatment] System injects pesticides or micronutrients into a tree with minimal wounding. This system injects chemicals into the active area of the tree where translocation (absorption) can immediately begin. Specifically, each tree needs to be inspected. The bark needs to be pliable and that depends upon local weather conditions.

Injections made during the spring or summer will be more successful than waiting until the fall. Injections can be made either in anticipation of pest presence or after pests are observed. Pest control is anticipated to last a typical growing season, although it may be recommended to inject the plants one or two times per year or more often under severe and repeated pest pressure. This product has been evaluated for phytotoxicity on a wide range of ornamental plants. However, since all ornamental plants have not been tested, it is recommended that one plant be treated first to make certain that no phytotoxicity occurs. Do not use on sick plants or plants weakened by extreme environmental conditions such as heat, flooding, cold, etc.

Wedgle™ Direct-Inject™ Tree Injection [Treatment] System

It's right for the trees. It's right for the company (increase profits). Minimizes wounding, promotes long-term tree vigor. Protects tree vascular system. Allows for annual retreatment. Complete treatment in 3 to 5 minutes per tree. No waiting, drilling, spraying, mixing or posting. Fast, easy and tree-friendly.

How to Use the ArborSystems™ Wedgle™ Direct-Inject™ Tree Injection [Treatment] System:

1. Use protective eyewear and rubber or neoprene gloves when handling or installing the Wedgle™ Direct-Inject™ Tree Injection System.
2. Attach the chemical container to the SW100 Injector Gun.
3. Attach the Wedgle Tip to the SW100 Injector Gun. Make sure the small hole in the tip is pointing straight up. Set the delivery volume on the syringe to 1 ml or ½ ml, as appropriate.
4. Determine the thickness of the bark. Insert the Wedgle Tip into the fissure of the tree. If the tip penetrates more than the length of a WedgeChek, the injection will be made in the fissure. If the tip penetrates less than the length of a WedgeChek, the injection will be made through the tight bark of the tree. On thin-barked trees, you may find it necessary to insert the WedgeChek in only one-half as far as normal.
5. Insert the WedgeChek™ Punch into the tree. Remove the punch and squeeze the trigger to remove the bark core. Examine the core to make sure the core that has been removed is approximately the same length as the WedgeChek. Repeat this step while moving around the flare of the tree. Be sure to follow the label directions on this insert to determine how many injection sites are needed on any given tree. Usually this is approximately 1 injection for every 4" to 6" of trunk circumference measured at 4.5' above the ground. Make WedgeChek insertions around the flare of the tree spacing evenly.
6. Place the WedgeChek on the protruding pin on the bottom of the grip then insert the WedgeChek directly into the punched hole. The barbs on the WedgeChek will secure it in the tree.
7. Insert the Wedgle™ Tip with a straight motion through the WedgeChek. Make sure the hole in the tip passes completely through the WedgeChek. As the tip is pushed through the WedgeChek and the bark, the blunt-edged tip automatically stops when it reaches the wood.
8. With a smooth motion, firmly squeeze both handles at the same time. This allows the chemical to be deposited into the active area of the tree where translocation(absorption) can immediately begin. The WedgeChek plugs the hole, allowing the chemical to remain in the tree.
9. Slowly withdraw the tip and repeat this step while moving around the circumference of the tree.
10. Move laterally and make the next injection until the entire tree trunk has been treated. After the tree has taken up the chemical, each WedgeChek can either be removed or left in the tree.

Indications	Dosage
Indicated for the treatment of woody trees and shrubs for the control of Elm Leaf Beetles, Lace Bugs and Mites.	1 ml per 4" to 6" of trunk circumference measured at 4.5' above the ground. Note: Depending on type of bark, the dosage per injection site may have to be reduced to ½ ml per site and the number of injection sites doubled.



Injection Into the Cambial
Tissue of the Tree



Injection Into the Fissures
(Not Bark) of the Tree

Storage and Disposal

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

Storage: Store in a tightly closed container in a cool, dry place. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Notice of Warranty

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

For assistance contact

ArborSystems™

P.O. Box 34645 Omaha, NE 68134

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

www.arborsystems.com

Greyhound™ Insecticide, Direct Inject™, Wedgle™ Tip and WedgeChek™ are registered trademarks of ArborSystems

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

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

[] Denotes alternate/optional language

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



June 19, 2003

Thomas C. Harris
Document Processing Desk - **AMEND**
Office of Pesticide Programs - **7504C**
U.S. Environmental Protection Agency
1921 Jefferson Davis Highway
Crystal Mall #2, Room 266A
Arlington, VA 22202-4501

Dear Mr. Harris:

Subject: ArborSystems, LLC
Greyhound Insecticide
EPA Reg. No. 69117-2

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

Attached are the following:

1. Application for Pesticide: Amendment [OPP IDN 299461]
2. One **Reference Label**
3. Five copies of revised draft labeling

The **Reference Label** illustrates all label revisions. We are primarily revising the label to add marketing/sales copy, add Mites and updating the Disposal directions per PR Notice 2001-6.

We have generated mite data using the injection method and Mites appear on the source product's label.

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

Regards,
RegWest Company, LLC



Kim Davis, GC, APC, Manager
Consultant/Agent

Attachments

pc: ASI - Doolittle, C.

30856 Rocky Road
Greeley, CO 80631-9375
970-353-0611
970-353-0613 Fax
regwestco@aol.com