691	17-2		11-200)4/		_		0000
120	United State nmental Prote 0 Pennsylvania Av Vashington, DC 20	es ction Agenc venue, N.W. 0460-0001		□ □	Ame Othe	stration ndment	OPP Ide	MB No. 2070-0060. ntifier Number
		pplication fo				1.5		
Company/Product Numb EPA	er A Reg. No. 69117-	-2	2. EPA P Th		_{anager} C. Harris		Proposed C	lassification
4. Company/ Product (Nam	^{ie)} hound [™] Insectici		PM#			3	None	Restricted
5. Name and Address of A ArborSystems, LLC c/o RegWest Compa 30856 Rocky Road	oplicant (Include ZIP Co)(i) my _i				h FIFRA Section composition and
Greeley, CO 80631-9	1375 neck if this is a new add	iress	EPA Reg			· · ·		
		S	ection – II					
Amendment – Explain	below.		1	printed I	abels in res	sponse to A	gency letter d	lated 12/31/03
	onse to Agency letter da	ated	! —		lication.	,		ICATION
Notification – Explain to	-				in below.			
Explanation: Use add		ssarv. (For Section		- LApic	in below.		— MAY	1 7 2004
This notification is consi- have been made to the i Sec. 1001 to willfully ma of PR Notice 98-10 and penalties under sections	labeling or the confic ke any false stateme 40 CFR § 152.46 th	dential statement ent to the EPA. nis product may i	of formula of the further understa	is produ and that	ct. I unde if this not	erstand tha lification is	t it is a viole not consist	ation of 18 U.S.C. ent with the terms
1. Material This Product V	Vill Be Packaged in:		ecuon – m					
Child Resistant Packaging	Unit Packaging		Water Soluble Pa	ckaging		2. Type o	f Container	
Yes*	Yes		Yes			☐ Plast		
*Certification must be submitted	If "Yes" Unit Packaging Wgt.	No. Per Container	If "Yes" Packaging Wgt.		. Per ntainer	☐ Glas ☐ Pape ☐ Other		
3. Location of Net Contents	Information	4. Size(s) Retail	Container		5. L	1	abel Directio	ens
☐ Label	☐ Container					On Label On Labelin	g Accompan	ying Product
6. Manner in Which Label is	s Affixed to Product	_	ograph oer glued	_	itenciled Other			< · >
			ection - IV				· c :	
1. Contact Point (Comp	lete items directly bei	low for identificate Title	ion of individual t	o be con			to process t Include Area	
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Kim Davis, CC, Al	· -	Certification			1		, 6 Date	Prègwest.com Application eived (Stamped)
accurate and complete punishable by fine or it	e. I acknowledge t	that any knowir	ngly false or mi					(orambea)
Signature	imprisonment of DC	3. Title	 		,		• ,	pure p
		5. Date	Consultant/Agent 5. Date			• .	b	
	C, APC, Manager			y 11, 20)n <i>a</i>			
Milli Davis, CC	<u>∍, Ar ∪, ivia</u> nager	l	ivid	y 11 <u>,</u> ∠1	, ,,,			

(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 Treatment System

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

NOTIFICATION

MAY 17 2004

Active Ingredient:

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

Contains 0.0047 pound Abamectin per 120 ml (4 oz.) bottle

Keep Out of Reach of Children WARNING

See insert for additional precautionary statements.

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 Treatment System Wedgle™ Direct-Inject™ Unit is designed to be used only with ArborSystems pre-bottled chemicals. Tampering with bottles or contents may cause non-warrantied damage to your 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.

Tree Graphic

{showing measurements and insertions)

Usually this is approximately one injection* for every 4" to 6" of trunk circumference. 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.

EPA Reg. No. 69117-2

EPA Est. 69117-NE-1

69117-2 **New Label**: Page 2 of 6 12/31/03 SAL + 05/11/04 NOTIF

Sold by ArborSystems 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 Treatment System

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

Active Ingredient: Abamectin (CAS Nos. 65195-56-4 and 65195-55-3) Other Ingredients	98%	•••••
Contains 0.0047 pound Abamectin per 120 ml (4 oz.) bottle	100%	•
Keep Out of Reach of Children WARNING See insert for additional precautionary statements.	• • • • • • • • • • • • • • • • • • • •	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4

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 Treatment System Wedgle™ Direct-Inject™ Unit is designed to be used only with ArborSystems pre-bottled chemicals. Tampering with bottles or contents may cause non-warrantied damage to your treatment system.

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
www.ArborSystems.com

{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™

Tree Treatment System

Active Ingredient:

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

 Other Ingredients
 98%

 Total
 100%

Contains 0.0047 pound Abamectin per 120 ml (4 oz.) bottle

Keep Out of Reach of Children WARNING

See inside for additional precautionary statements.

EPA Reg. No. 69117-2

may also contact 1-800-698-4641 for emergency medical treatment information.

EPA Est. 69117-NE-1

Sold by

ArborSystems

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

PRECAUTIONARY STATEMENTS Hazards to Humans & Domestic Animals

WARNING: 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

	Tilst Alu			
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.			
lf on Skin	Take off contaminated clothing.			
or Clothing	 Immediately rinse skin with plenty of water for 15-20 minutes. 			
	Call a poison control center or doctor for treatment advice.			
If Swallowed	 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	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 produ	ict container or label with you when calling a poison control center or doctor, or going for treatment. You			

69117-2 **New Label**: Page 4 of 6 12/31/03 SAL + 05/11/04 NOTIF

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 jts-lab	eling.
GENERAL INFORMATION Do not use on crop-bearing trees.	0 u 0 u 0 u 0 u 0 u 0 u 0 u 0 u 0 u 0 u	• • • • • • • • • • • • • • • • • • • •
ArborSystems™ Wedgle™ Direct-Inject™ Tree Treatment S using the patented Wedgle™ Tip and WedgeChek™	system	•••••

The treatment 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 ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System requires less chemical to achieve control. Easy-to-use closed system is fast and efficient.

The treatment 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 treatment system: the ArborSystems Wedgle Direct-InjectTM Tree Treatment System. It's right for the trees. Minimizes wounding, promotes tree vigor. The ArborSystems WedgleTM Direct-InjectTM Tree Treatment 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 WedgleTM Direct-InjectTM 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 or air, assuring proper water and nutrient movement and food storage; requires

69117-2 **New Label**: Page 5 of 6 12/31/03 SAL + 05/11/04 NOTIF

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 Treatment System injects pesticides 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.

ArborSystems Wedgle™ Direct-Inject™ Tree 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 TreatmentsSystem: *****

- 1. Use protective eyewear and rubber or neoprene gloves when handling or installing the ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System.
- 2. Attach the chemical container to the Wedgle[™] Direct-Inject[™] Unit.
- 3. Attach the Wedgle Tip to the Wedgle Direct-Inject Unit. Make sure the small hole in the tip is pointing straight up. Set the delivery volume on the unit 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. 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.	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.

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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) 339-50111

www.ArborSystems.com

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

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

NOTIFICATION

MAY 1 7 2004

GREYHOUND™ Insecticide

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

GREYHOUND™ Insecticide

For Systemic Insect Control on Landscape Ornamentals and Interior Plantscapes.

For Use by Professional Arborists/Applicators with the ArborSystems Wedgle Direct-Inject Tree Treatment System.

Albulaysterns wedgle	Duect-inject	ilee ireaurient o	ystem.
ACTIVE INGREDIENT:			
Abamectin (CAS Nos. 65	195-56-4 and	65195-55-3)	2%
OTHER INGREDIENTS			98%
		76	otal: 100%

Contains 0.0047 pound Abamectin per 120 ml (4 oz.) bottle.

Keep Out of Reach of Children WARNING

See insert for additional precautionary statements.

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.

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.

Net Contents 4 oz. (120 mi) EPA Reg. No. 69117-2 EPA Est. 69117-NE-1 Sold by

ARbon Systems www.ArborSystems.com

GH BXL_04-103

GREYHOUND** Insecticide

For Systemic Insect Control on Landscape Ornamentals and Interior Plantscapes.

For Use by Professional Arborists/Applicators with the ArborSystems Wedgle** Direct-Inject** Tree Treatment System.

ACTIVE INGREDIENT:

Keep Out of Reach of Children

Contains 0.0047 pound Abamectin per 120 ml (4 oz.) bottle.

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.

STORAGE AND DISPOSAL

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Net Contents 4 oz. (120 ml) EPA Reg. No. 69117-2 EPA Est. 69117-NE-1

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www.ArborSystems.com

GH_BL_04-103

GREYHOUND" INSECTICIDE

For Systemic Insect Control on Landscape Ornamentals and Interior Plantscapes. For Use by Professional Arborists/Applicators with the ArborSystems Wedgle Direct Inject Tree Treatment Syste

ACTIVE INGREDIENT

Abamectio98% Total: 100%

> Contains 0.0047 pound Abamectin per 120 mi (4 oz.) bottle

Keen Out of Reach of Children WARNING

See inside for additional precautionary statements.

Net Contents 4 oz. (120 ml) EPA Reg. No. 69117-2 EPA Est. 69117-NE-1



P.O. 8ox 34645 • Omaha, NE 68134 www.ArhorSystems.com

PRECAUTIONARY STATEMENTS

MAZAROS TO NUMANS AND

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, Ayoul contact with skin.
May be fatal if swallowed. Use protective eyewear
and rubber or neoprene gloves. Remove contaminated cicking and wash before reuse. Throughly wash
with soap and water after handling and before eating,
drinking or using tobacco. drinking or using tobacco.

FIFTST AND

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 freatment advice.

if on Skin or Clothing: Take off contaminated clothing, immediately riase skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treat-

If Swallowed: Immediately give one or two glasses of water and induce vomiting by gently touching back of the throat with finger, firmediately call a poison control center or doctor for treatment advice. Do not induce womiting or 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 posson control center or doctor for further treat-

Have the product container or label with you when call ing a poison control center or doctor, or going for treat-ment. You may also contact 1-800-698-4641 for emernedical treatment informatio

gency medical treatment information.

Note to Physician: Early signs of intoxication include mydrasis (plated purels), advai (unsteadiness) and muscle tremors. Toxicity following accidental ingestion of this product can be minimized by inducing ventifing within one half hour of exposure. It toxicity from exposure has progressed to cause severe vomiting the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive measures studies a 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 abaments in shelived to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (hardharder, behance GABA activity thandharder).

ENTROMENTAL 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 instalt. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops. Do not apply his product to blooming crops to not apply this product to blooming crops if bees are wisting 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.

GENERAL INFORMATION

Do not use on crop-bearing trees.

ArborSystems Wedgle" Direct-Inject" Tree Treatment System using the Patented Wedgle" Tip and WedgeChek"

The Arbors's wedge of the Arbors's stems Wedgle: Direct-inject." Tree Treatment System injects pesticides into a tree with minimal wounding. This system injects chemicats into the active area of the tree where translocation (absorption) can immediately begin, injections made during the spring or summer will be more successful than waiting until the fall. Specifically, each tree needs to be inspected. The bark needs to be plable and that depends upon local weather conditions.

plable and that depends upon local weather conditions the close can be made either in anticipation of pest presence or after pests are observed. Pest control is anticipated to tisst a hybical growing season, atthough 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 or 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 clants weakened by extreme environmental conditions such as heat, flooding, cold, etc.continued on back

GREYHOUND" INSECTICIDE

For Systemic Insect Control on Landscape Ornamentals and Interior Plantscapes. For Use by Professional Arborists/Applicators with the ArborSystems Wedgle "Direct-Inject" Tree Treatment System

ACTIVE INGREDIENT:

Abamectio (CAS Nos. 65195-56-4 and 65195-55-3)2% OTHER INGREDIENTS

> Contains 0.0047 pound Abamectin per 120 ml (4 oz.) bottle.

Keen Out of Reach of Children

WARNING See inside for additional precautionary statements

Net Contents 4 az. (120 mi) EPA Reg. No. 69117-2 EPA Est. 69117-NE-1

Sold by ARBOR SYSTEMS P.O. Box 34645 • Omaha, NE 68134

www.ArborSystems.com

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
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. Harmfull 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 cubring and wash before reuse. Thoroughly wash
with soap and water after handling and before eating,
drinking or using tobacco.

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 treat-

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 Swallowed: immediately give one or two glasses of water and induce vomiting by gently bucking back of the throat with linger, 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: 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 treat-

Have the product container or label with you when call ing a poison control center or doctor, or going for treat-ment, You may also contact 1-800-698-4641 for emer-gency medical treatment information.

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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 instalt. This product is highly toxic to bees exposed to direct treatment or residues on booming 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.

GENERAL INFORMATION

Do not use on crop-bearing trees. ArborSystems Wedgle" Direct-Inject" Tree Treatment System using the Patented Wedgle" Tip and WedgeChek"

The ArborSystems Wedgle - Direct-Inject* Tree Treatment System njects pesticides into a tree with minimal wound-ing. This system injects chemicals into the active area of the tree where translocation (absorption ca immediate-by begin. Injections made during the spring or summer will be more successful than warfing until the fall. Specifical each tree needs to be inspected. The bark needs to be gli-able and that depends upon local weather conditions.

GREYHOUND" INSECTICIDE

For Systemic Insect Control on Landscape Ornamentals and Interior Plantscapes. For Use by Professional Arbonists/Applicators with the ArborSystems Wedgle" Direct-Inject" Tree Treatment System.

ACTIVE INGREDIENT

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

> Contains D 0047 pound Abamectin per 120 ml (4 oz.) bottle

Keep Out of Reach of Children WARNING

See inside for additional precautionary statements.

Net Contents 4 oz. (120 ml) EPA Reg, No. 69117-2 EPA Est, 69117-NE-1

Sold by ARbor Systems P.O. Box 34645 • Omaha, NE 68134

www.ArborSystems.com

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Prolonged or frequently repeated exposure may cause altergic 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. Throughly wash with soap and water after handling and before eating difference users to beare. drinking or using tobacco.

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 treating eye, Call a ment advice.

If on Skin or Clothing: Take off contaminated clothing, immediately finse skin with plenty of water for 15-20 minutes, Call a poison control center or doctor for treatment advice.

"If Swallowed: Immediately give one or two glasses of water and induce womiting by gently fouching back of the throat with finger immediately call a poison control center or doctor for treatment advice. Do not induce womiting or 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, titlen 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 call ing a poison control center or doctor, or going for treat-ment. You may also contact 1-800-698-4541 for emer-gency medical treatment information.

gency medical treatment information.

Note to Physician: Early signs of infoxication include mydrasis (diated pupils), adava (unsteadiness) and muscle tremors. Toxicity following accidental lingestion of this product can be minimized by inducing vomiting within one half hour of exposure. It foxicity 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 animats, it is probably wise to avoid drugs that enhance GABA activity (harbitraries, benzolazepines, valproic acid) in patients with potentially toxic abamectin exposure.

ENVIROMENTAL HAZARDS

ENVIROMENTAL HAZARDS

ENVIRONMENTAL HAZARIS

This product is toxic to fish and widdlife. Do not apply directly to water. Do not contaminate water when disposing of equipment wash water or instalt. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops. Do not apply this product to blooming crops it bees are wisting 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.

GENERAL INFORMATION Do not use on crop-bearing trees.

ArborSystems Wedgle" Direct-Inject" Tree Treatment System using the Patented Wedgle" Tip and WedgeChek"

Inp and Wedgetnek."

The ArborSystems Wedge "Direct-Inject." Tree Treatment System Injects pesticides into a tree with minimal wounding. This system injects chemicals into the active area of the tree where translocation (absorption) can immediately begin, Injections made during the spring or summer will be more successful than waiting until the fall. Specifically, each tree needs to be injected. The bark needs to be pileable and that depends upon local weather conditions,

GREYHOUND" INSECTICIDE

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PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
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. Us. Localive gewear
and rubber or neoprene glow.s. Remove contaminated clothing and wash before react. Lilicoughly wash
with seap and water after handling and before eating,
drinking or using tobacco.

FIRST AND

If in Eyes: Hold eye open and rinse slowly and gently with with with 10.20 minutes. Remove contact lenses, if pusent, with the first 5 minutes, then continue rinsing eye. Call a pusen control lenter or dictor for treatment advice.

If on Skm or Climbing: Take off contaminated clothing. Immediately mase skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treat-

If Swallweed: Inmediately give one or two glasses of water-and-nauce wornling by genth; butching back of the throat with finger, Immediately call a poson control center or doctor for treatment action. So not induce wornling or give anything by mouth to an unconscious person.

If inhaled: Move person to fresh air if person is not breathing, call 911 or an ambulants, then give artificial respiration, preferably by mouth the mouth, if possible, Call a poison control center or doctor for further treatment advice.

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

gency medical treatment information.

Note to Physician: Early signs of intoxication include mydrasis (dilated pupils), alaxia (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 electrotyte imbalance should be gauged. Appropriate supportive paranteral 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, its probably wise to avoid drugs that enhance GABA activity (harbiturates, benzoldazepines, valpruic acid) in patients with potentially boxic abamectin exposure. toxic abamectin exposure

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Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

GENERAL INFORMATION
Do not use on crop-bearing trees.

ArborSystems Wedgle" Direct-Inject" Tree Treatment System using the Patented Wedgle" Tip and WedgeChek"

The Arbor/Systems Wedge's" Direct-Inject" Tree Treatment System injects pesticides into a tree with minimal wound-ing. This system injects chemicals into the active area of the tree where translocation (absorption) can immediate by begin, injections made during the spring or summer will be more successful than waiting until the fall. Specifically, each tree needs to be inspected. The bark needs to be pi-able and that depends upon local weather conditions.

injections can be made either in anticipation of pest pres-ence or after pests are observed. Pest control is anticience 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 phytobocity on a wide range of original plants. However, since all originating plants have not been tested, it is recommended that one plant be treated first to make certain that no phytobocity occurs. Do not use on sick plants or plants weakened by extreme environmental conditions such as heat, flooding, cold, etc. ...continued on back

HOW TO USE THE ARBORSYSTEMS WEDGLE" DIRECT-INJECT TREE TREATMENT SYSTEM:

- Use protective eyewear and rubber or neoprene gloves when handling or installing the ArborSystems Wedgle" Direct-Inject" Tree Treatment System.
- 2. Attach the chemical container to the Wedgle Direct-Inject" Unit.
- Attach the Wedgle" Tip to the Wedgle" Direct-let. "Unit. Make sure the small hole in the top is pointing straight up. Set the delivery volume on the unit to 1 ml or 1/2 ml, as appropriate.
- unit to 1 that the 72 m, as appropriate.

 A Determine the thickness of the bank, insert the Wedgle". Tip into the fissure of the tree, if the tip penetrates more than the length of a WedgleChek, the njection will be made in the fissure. If the tip penetrates less than the length of a WedgleChek, the injection will be made through the tight bank of the tree. On thin-banked trees, you may find if necessary to insert the WedgleChek, in only one-half as far as promise. far as normai
- 5. Insert the WedgeChek " Punch into the tree. Remove insert the WedgeChek "Punch into the tree. Remove the punch and squeeze the tingger 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 free. Be sure to fol-low the label directions on this insart 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. Make Wedgethek" insertions around the flare of the tree.
- 5. 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.
- wedgetaler. Will see section in the aler.

 I hasen the Wedgle" Tip with a straight motion through the WedgleChek". As we the hole in the top passes completely through the WedgleChek". As the tip is pushed through the WedgleChek" and the bark the blunt-edged the automatically stops when it as the or the strain of the section of the sec
- 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 white moving around the circumference of the tree
- 10. Move laterally and make the next injection until the entire tree trunk has been freated. After the tree has taken up the chemical, each WedgeChek" can either be removed or left in the tree.

INDICATIONS
Indicated for the treatment of woody trees and shrubs for the control of Elm Leaf Beetles. Lace Bugs and

DOSAGE

DUNAGE

In the per 4" to 6" of trunk circumference. Note:
Depending on type of bark, the dosage per injection
site may have to be reduced to 1/2 ml per site and the
number of injection sites doubled.

STORAGE AND DISPOSAL

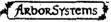
STURABLE AND DISPUSAL

Do not contamnate water, food or feed by storage or disposal. Storage: Store in a tightly closed container in a cool, dry place. Disposal: If empty — On 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 autdoor 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 of representation, express or implied, concepting the product. cerning this product.

For assistance contact



P.O. Box 34645 • Omaha, NE 68134 Toll-Free: 1-800-698-4641 Phone: (402) 339-4459 FAX: (402) 339-5011 www.ArborSystems.com

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

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

HOW TO USE THE ARBORSYSTEMS WEDGLE" DIRECT-INJECT" TREE TREATMENT SYSTEM:

- . Use protective evewear and nubber or negozene gloves when handling or installing the ArborSystems Wedgle" Direct-Inject" Tree Treatment System.
- Attach the chemical container to the Wedgle' Direct-Inject" Unit.
- Attach the Wedgle" Tip to the Wedgle" Direct-leget" Unit. Make sure the small hole in the tip is pointing straight up. Set the delivery volume on the unit to 1 ml or 1/2 ml, as appropriate.
- unit o 1 mil of 1/2 ml, as appropriate.

 4. Determine the thickness of the bark, insert the Wedgle. The into the fissure of the tree, if the tip penetrates more than the length of a WedgeChek, the injection will be made in the lissure. If the tip penetrates less than the length of a WedgeChek, the injection will be made through the tight bark of the free. On thin-barked trees, you may find it necessary to insert the WedgeChek, in only one-half as far as normal.
- 5. Insert the WertgeChek" Punch into the tree. Remo Insert the WedgeChek "Punch into the tree. Remov the punch and squeeze the frigger to remove the bark core. Examine the core to make sure the core that has been removed is appointmately the same length as the WedgeChek". Repeat this step while moving around the flare of the tree. Be sure to fol-low the lacet 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, Make WedgeChek" insertions around the flare of the tree, spacing evenly.
- Place the WedgeChek on the protruding pin on the bottom of the girls then insert the WedgeChek directly into the punched hole. The barbs on the WedgeChek will secure it in the tree.
- wedgechak. Will secure in Intel mee,

 I 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 to is pushed through the WedgeChek" and the
 bark the blunt-edged tip automatically stops when it
- 8. With a smooth motion, timity 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 WedCink" plugs the hole, allowing the chemical to remain in the tree.
- 9. Slowly withdraw the tip and repeat this step white moving around the circumference of the tree
- 10. Move laterally and make the next injection until the entire trea trunk has been treated. After the tree has taken up the chemical, each WedgeChek " can either be removed or left in the tree.

INDICATIONS

Indicated for the treatment of woody trees and shrubs for the control of Elm Leaf Beetles, Lace Bugs and

DOSAGE

1 ml per 4" to 6" of trunk circumference. Note: Depending on type of bark, the dosage per injection site may have to be reduced to 1/2 ml per site and the number of injection sites doubled.

STORAGE AND DISPOSAL

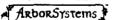
STORAGE AND DISPUSAL

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 focal sold 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, conception, the product of the produ cerning this product.

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

WedgeCoek** is protected by U.S. Patent #5.797,215

HOW TO USE THE ARBORSYSTEMS WEDGLE" DIRECT-INJECT TREE TREATMENT SYSTEM:

- 1. Use protective evewear and nubber or pengrene gloves when handling or installing the ArborSystems Wedgle " Direct-Inject " Tree Treatment System.
- 2. Attach the chemical container to the Wedgle" Direct Inject" Unit
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- In ser the WedgeChek." Punch into the tree. Remov 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 fare 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 circumterence. Make WedgeChek" insertions around the flare of the tree.
- 6. Place the WedgetChek" on the protruding pin on the bottom of the grip then insert the WedgetChek" directly into the punched hole. The barbs on the WedgetChek" will secure it in the tree.
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INDICATIONS

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Indicated for the treatment of woody trees and shrubs for the control of Elm Leaf Beetles, Lace Bugs and Mites.

DOSAGE

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STORAGE AND DISPOSAL

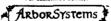
STURAGE AND DISPUSAL

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 ofter 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 Arbor-systems warrants that intis product commons warrants that intis product common step 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. Arbor-systems does not make or authorize any agent or representative or make any other warranty, guarantee or representation, express or implied, conceing this configuration. cerning this product.

For assistance contact



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GREYHOUND** Insecticide, Wedgle** Direct-Inject**, We and WedgeChek!** are trademarks of ArtorSystem

Wedgie™ Tip is protected by U.S. Patent #5,239,773 WedgeChex™ is protected by U.S. Patent #5,797,215

HOW TO USE THE ARBORSYSTEMS WEDGLE" DIRECT-INJECT" TREE TREATMENT SYSTEM:

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- Attach the Wedgle" Tip to the Wedgle" Direct-inject" Unit. Make sure the small hole in the tip is pointing straight up. Set the delivery volume on the unit to 1 intl or 1/2 ml, as appropriate.
- unit to 1 ml or 1/2 ml, as appropriate.

 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' he injection will be made in the fissure. If the tip penetrates less than the length of a WedgeChek' he injection will be made through the tipht 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.
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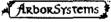
STORAGE AND DISPOSAL

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For assistance contact



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GREVHOUND *** Insacticute, Wedgle*** Direct-Inject ***, Wedgle*** Lip and WedgeChek*** are trademarks of Arbor Systems

Wedgle M Tip is protected by U.S. Patent #5,239,773 WestneChek™ is protected by U.S. Patent #5 797.215



May 11, 2004

Mr. Thomas C. Harris
Document Processing Desk – NOTIF
Office of Pesticide Programs - 7504C
U.S. Environmental Protection Agency
1921 Jefferson Davis Highway
Crystal Mall 2, Room 266A
Arlington, VA 22202-5601

Dear Mr. Harris:

Subject: ArborSystems

Greyhound[™] Insecticide EPA Reg. No. 69117-2

On behalf of its client *ArborSystems*, RegWest Company, LLC is submitting the attached materials as notification of a label revision for subject product. We are also submitting final printed labeling pursuant to the December 31, 2003 EPA letter. RegWest Company will act as sole agent in this endeavor.

Attached are the following:

- 1. Application for Pesticide: Other
- 2. Notification Acknowledgement
- 3. One *Reference Label* (illustrates the revisions)
- 4. One **New Label** (incorporating the revisions)
- 5. Two copies of final printed labeling

As illustrated on the **Reference Label**, the primary revision to this label is to standardize the name of the "system" to *ArborSystems Wedgle* Direct-Inject Tree Treatment System. In addition, the name of the injection gun has been changed from SW100 Injector Gun to Wedgle Direct-Inject Unit. These are the market names chosen by my client and the marketing team for the injection system.

We are also deleting the instruction to "measure at 4.5' above the ground" as this is no longer a valid instruction within the industry.

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, CO, APC, Manager

Consultant/Agent

Attachments

pc: ASI - Doolittle, C.

30856 Rocky Road Greeley CO 80631-9375 970-353-0611 970-353-0613 Fax

Kim@regwest.com