

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060.

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

Application for Pesticide – Section I

1. Company/Product Number EPA Reg. No. 69117-6	2. EPA Product Manager Dani Daniel	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/ Product (Name) Pointer™-12 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 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section – II

<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below.
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

NOTIFICATION
MAR 28 2005

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

**Submit label revision notification per PR Notice 98-10
(to add "Bark Beetles (such as IPS)" to the list of pests controlled)
(Refer to the "Revision Illustration")**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR § 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR § 152.46 this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section – III


1. Material This Product Will Be Packaged In:				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
				<input type="checkbox"/> Other (Specify): _____	
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"/> Stenciled		
		<input type="checkbox"/> Paper glued	<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).		
Name Kim Davis, CC, APC, Manager	Title Consultant/Agent	Telephone No. (Include Area Code) (970) 353-0611 kim@regwest.ccm

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.

2. Signature 	3. Title Consultant/Agent	6. Date Application Received (Stamped)
4. Typed Name Kim Davis, CC, APC, Manager	5. Date March 14, 2005	

Revision Illustration

The ArborSystems Wedgle™ Direct-Inject™ Tree 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 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-Inject™ Tree Treatment System.

The ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System injects pesticides or micronutrients into a tree with minimal wounding. The system injects chemicals into the area of bark separation where the chemical can actively be transferred to other parts of the tree. 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 pliable and that depends upon local weather conditions.

Note: When using Pointer-12 Insecticide, the ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System must be cleaned periodically to prevent clogging.

How to Use the ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System

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 bottle 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 bark to separate and the chemical to be deposited into the area. 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 flare 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.

Pests Controlled	Dosage
Adelgids, Armored Scales (suppression), Aphids, <u>Bark Beetles (such as IPS)</u> , Elm Leaf Beetles, Black Vine Weevil Larvae, Eucalyptus Longhorned Borer, Flatheaded Borers (including bronze birch borer, emerald ash borer and alder-birch borer), Japanese Beetles, Lacebugs, Leafhoppers, Leafminers, Mealybugs, Sawfly Larvae, Pine Tip Moth Larvae, Psyllids, Royal Palm Bugs, Soft Scale Insects, Thrips (suppression), White Grub Larvae (such as Japanese beetle larvae, Chafers, <i>Phyllophaga</i> spp., Asiatic Garden Beetle and Oriental Beetle) and Whiteflies.	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 ½ ml per site and the number of injection sites doubled.

{Box Label}

POINTER™-12 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

- Easy • Economical • Effective
- No Spraying • No Drilling • No Posting • Saves Time and Money

NOTIFICATION
MAR 28 2005

Active Ingredient:

Imidacloprid (CAS No. 138261-41-3)	12%
Other Ingredients	88%
Total	100%

Contains 14.4 grams (4.8 oz.) active ingredient per 120 ml (4 oz.) bottle.

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

Net Wt. 4 oz. (120 ml)

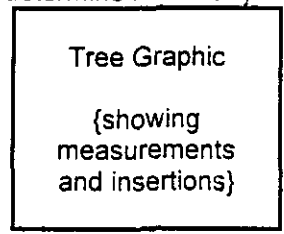
DIRECTIONS FOR USE

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

The 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-warranted 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.



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.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with fertilizers, food, feed and other pesticides. Store in original container out of reach of children, preferably in a locked storage area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Disposal:** Triple rinse, or equivalent, then: offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or by incineration; or if allowed by state and local authorities, by burning. If burned stay out of smoke.

EPA Reg. No. 69117-6 EPA Est. 69117-NE-1

Sold by
ArborSystems™
www.ArborSystems.com

{Container Label}

POINTER®-12 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:
Imidacloprid (CAS No. 138261-41-3) 12%
Other Ingredients 88%
Total 100%
Contains 14.4 grams (4.8 oz.) active ingredient per 120 ml (4 oz.) bottle.

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

Net Wt. 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

The 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-warranted damage to your treatment system.

Storage and Disposal

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

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with fertilizers, food, feed and other pesticides. Store in original container out of reach of children, preferably in a locked storage area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Disposal:** Triple rinse, or equivalent. then: offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or by incineration; or if allowed by state and local authorities, by burning. If burned stay out of smoke.

EPA Reg. No. 69117-6 EPA Est. 69117-NE-1

Sold by

ArborSystems™
www.ArborSystems.com

{Insert}

POINTER®-12 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:
Imidacloprid (CAS No. 138261-41-3) 12%
Other Ingredients 88%
Total 100%
Contains 14.4 grams (4.8 oz.) active ingredient per 120 ml (4 oz.) bottle.

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

Net Wt. 4 oz. (120 ml)

EPA Reg. No. 69117-6 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

CAUTION: Harmful if swallowed, inhaled or absorbed through skin. May cause eye irritation. Do not get in eyes or on clothing. Thoroughly wash with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid

If Swallowed	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in Eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-698-4641 for emergency medical treatment information.</p>	

{Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

Environmental Hazards

This product is highly toxic to fish and aquatic invertebrates. Do not apply directly to water, 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. This product is highly toxic to bees exposed to direct treatment or residues on blooming plants or weeds. Do not apply this product or allow it to drift to blooming plants or weeds if bees are visiting the treatment area.

DIRECTIONS FOR USE

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

GENERAL INFORMATION
Do Not Apply to Food Bearing Plants

ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System
Using the Patented Wedgle™ Tip and WedgeChek™

The ArborSystems Wedgle™ Direct-Inject™ Tree 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 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.

The ArborSystems Wedgle™ Direct-Inject™ Tree 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 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-Inject™ Tree Treatment System.

The ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System injects pesticides or micronutrients into a tree with minimal wounding. The system injects chemicals into the area of bark separation where the chemical can actively be transferred to other parts of the tree. 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 pliable and that depends upon local weather conditions.

Note: When using Pointer-12 Insecticide, the ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System must be cleaned periodically to prevent clogging.

How to Use the ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System

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 bottle 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 bark to separate and the chemical to be deposited into the area. 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 flare 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.

Pests Controlled	Dosage
Adelgids, Armored Scales (suppression), Aphids, Bark Beetles (such as IPS), Elm Leaf Beetles, Black Vine Weevil Larvae, Eucalyptus Longhorned Borer, Flatheaded Borers (including bronze birch borer, emerald ash borer and alder-birch borer), Japanese Beetles, Lacebugs, Leafhoppers, Leafminers, Mealybugs, Sawfly Larvae, Pine Tip Moth Larvae, Psyllids, Royal Palm Bugs, Soft Scale Insects, Thrips (suppression), White Grub Larvae (such as Japanese beetle larvae, Chafers, <i>Phyllophaga</i> spp., Asiatic Garden Beetle and Oriental Beetle) and Whiteflies.	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 ½ ml per site and the number of injection sites doubled.



[Cross-section of tree showing
Wedge™ Tip and WedgeChek™]

Storage and Disposal

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

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with fertilizers, food, feed and other pesticides. Store in original container out of reach of children, preferably in a locked storage area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Disposal:** Triple rinse, or equivalent, then: offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill; or by incineration; or if allowed by state and local authorities, by burning. If burned stay out of smoke.

Notice of Warranty

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

For assistance contact

ArborSystems™

P.O. Box 34645 Omaha, NE 68134

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

www.ArborSystems.com

Pointer™-12 Insecticide, Wedge™ Direct-Inject™, Wedge™ Tip and WedgeChek™

are trademarks of ArborSystems

Wedge™ 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



March 14, 2005

Ms. Dani Daniel
Document Processing Desk – **NOTIF**
Office of Pesticide Programs - **7504C**
U.S. Environmental Protection Agency
1801 South Bell Street
Crystal Mall #2, Room 266A
Arlington, VA 22202-5601

Dear Ms. Daniel:

Subject: ArborSystems
Pointer™-12 Insecticide
EPA Reg. No. 69117-6

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

Attached are the following:

1. Application for Pesticide: Other
2. Revision Illustration (page 4 of the New Label)
3. Two copies of the **New Label** (incorporating the revision)

As shown on the **Revision Illustration**, we are adding "Bark Beetles (such as IPS)" to the *Pests Controlled* section. No other changes are being made at this time.

Per PR Notice 98-10 we do have (maintain) an efficacy study that supports this addition.

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

Regards,
RegWest Company, LLC

A handwritten signature in black ink, appearing to read "Kim Davis", is written over a circular stamp or mark.

Kim Davis, CC, 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