

09117-7

7-14-2003

1-9

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

United States <b>Environmental Protection Agency</b> 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 <b>299459</b>
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**Application for Pesticide - Section I**

1. Company/Product Number <b>EPA Reg. No. 69117-7</b>	2. EPA Product Manager <b>Rick Keigwin</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/ Product (Name) <b>Pinscher PGR</b>	PM # <b>22</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>ArborSystems LLC c/o RegWest Company, LLC 30856 Rocky Road Greeley, CO 80631-9375</b>	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.	<b>NOTIFICATION</b>  <b>JUL 14 2003</b>
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**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

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

**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	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	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): _____		
<b>*Certification must be submitted</b>		If "Yes" Unit Packaging Wgt.	No. Per Container	If "Yes" Packaging Wgt.	No. Per Container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container <b>4 ounces</b>		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 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 <b>Kim Davis, CC, APC, Manager</b>	Title <b>Consultant/Agent</b>	Telephone No. (Include Area Code) <b>(970) 353-0611</b>
<b>Certification</b> 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 <b>Consultant/Agent</b>	
4. Typed Name <b>Kim Davis, CC, APC, Manager</b>	5. Date <b>June 18, 2003</b>	

2-9



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

299454

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

3. Location of Net Contents Information  
 Label  Container

4. Size(s) Retail Container

5. Location of Label Directions  
 On Label  
 On Labeling accompanying product

6. Manner in Which Label is Affixed to Product  
 Lithograph  
 Paper glued  
 Stenciled  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.

2. Signature	3. Title	6. Date Application Received (Stamped)
4. Typed Name	5. Date	

{Box Label}

# PINSCHER™ PGR

For Systemic Chemical Pinching and Pruning of Certain [Various] Landscape Ornamentals  
Prevents Flowering and Fruit Set  
Pinches Off the Fruit

For Use on Broadleaf Trees to Retard the Growth of Certain [Various] Landscape Ornamentals  
Reduces the Frequency of Manual Pruning

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:**

Dikegulac-sodium\* (CAS No. 52508-35-7) ..... 18.5%

**Other Ingredients** ..... 81.5%

Total ..... 100.0%

\*Sodium salt of 2,3:4,6-bis-O-(1-methylethylidene)-a-L-xylo-2-Hexulofuranosonic acid

Contains 24 grams (0.2 oz.) active ingredient per 120 ml (4 oz.) bottle.

**NOTIFICATION**

JUL 14 2003

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

Net Wt. 4 oz. (120 ml)

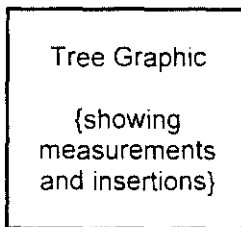
**DIRECTIONS FOR USE**

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

**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.

EPA Reg. No. 69117-7 EPA Est. 69117-NE-1

[Sold by]

**ArborSystems™**  
Omaha, NE 68134  
www.arborsystems.com

{Container Label}

**PINSCHER™ PGR**

**For Systemic Chemical Pinching and Pruning of Certain [Various] Landscape Ornamentals  
Prevents Flowering and Fruit Set  
Pinches Off the Fruit**

**For Use on Broadleaf Trees to Retard the Growth of Certain [Various] Landscape Ornamentals  
Reduces the Frequency of Manual Pruning**

**For Use By Professional Arborists/Applicators with the ArborSystems™ Wedgle™ Direct-Inject™  
Tree Injection [Treatment] System**

**Active Ingredient:**

Dikegulac-sodium\* (CAS No. 52508-35-7) ..... 18.5%

**Other Ingredients** ..... 81.5%

Total ..... 100.0%

\*Sodium salt of 2,3:4,6-bis-O-(1-methylethylidene)-a-L-xylo-2-  
Hexulofuranosonic acid

Contains 24 grams (0.2 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

**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.

**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. 69117-7 EPA Est. 69117-NE-1

[Sold by]

**ArborSystems™**  
Omaha, NE 68134  
www.arborsystems.com

{Insert}

**PINSCHER™ PGR**  
For Systemic Chemical Pinching and Pruning of Certain [Various] Landscape Ornamentals  
Prevents Flowering and Fruit Set  
Pinches Off the Fruit  
For Use on Broadleaf Trees to Retard the Growth of Certain [Various] Landscape Ornamentals  
Reduces the Frequency of Manual Pruning  
For Use By Professional Arborists/Applicators with the ArborSystems™ Wedgle™ Direct-Inject™  
Tree Injection [Treatment] System

**Active Ingredient:**

Dikegulac-sodium\* (CAS No. 52508-35-7) ..... 18.5%  
**Other Ingredients** ..... 81.5%  
Total ..... 100.0%

\*Sodium salt of 2,3:4,6-bis-O-(1-methylethylidene)-α-L-xylo-2-Hexulofuranosonic acid  
Contains 24 grams (0.2 oz.) active ingredient per 120 ml (4 oz.) bottle.

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

EPA Reg. No. 69117-7

EPA Est. 69117-NE-1

[Sold by]

**ArborSystems™**

Omaha, NE 68134

www.arborsystems.com

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans & Domestic Animals**

**CAUTION:** Harmful if inhaled. Avoid breathing vapors. Avoid contact with skin, eyes or clothing. Thoroughly wash with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**First Aid**

<b>If Inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If on Skin or Clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Immediately rinse skin with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in Eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>

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

**Environmental Hazards**

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.

**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 Inject Food 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. The system injects chemicals into the active area of the tree where translocation (absorption) can immediately begin. Tree growth is highly variable depending upon species, location, climatic factors, environmental conditions, etc. It is recommended, before large-scale tree injection programs are pursued, that users establish, by testing on a limited number of trees, the best rates to produce the desired growth reduction under local growing conditions.

Pinscher PGR [This product] is a growth retardant [systemic plant growth regulator] for use on certain [various] landscape ornamentals. Pinscher PGR [This product] may also be used on certain [various] landscape ornamentals to prevent flowering and fruit set. Pinscher PGR [This product] temporarily stops shoot elongation and promotes lateral branching; this reduces the need for manual trimming and pruning. It can also improve the appearance of landscape ornamentals by gradually filling in growth and providing a more uniform, compact shape. Some trees are more susceptible than others; repeated treatment may cause bark damage. Check before retreatment.

The best results on deciduous trees are obtained when winter-trimmed or untrimmed trees are injected with Pinscher PGR after the first flush of leaves is ¾ to fully developed and before shoot growth begins. Broadleaf evergreens may be treated during seasonal growth flushes. After a spring application of Pinscher PGR trees usually maintain their shape for a full season without additional manual pruning. [One spring application provides season-long control.] For fruit elimination, inject trees prior to fruit setting, preferably in late summer to reduce fruiting the following year.

**Precaution:** Do not inject Pinscher PGR into drought-stressed trees or trees that do not appear healthy.

**Note:** When using Pinscher PGR, the ArborSystems™ Wedgle™ Direct-Inject™ Tree Injection [Treatment] System must be cleaned periodically to prevent clogging.

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

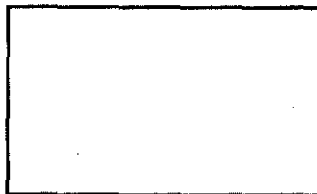
1. Use protective eyewear and rubber or neoprene gloves when handling or installing the ArborSystems™ Wedgle™ Direct-Inject™ Tree Injection [Treatment] System.
2. Attach the chemical container to the SW100 Injector Gun.
3. Attach the Wedgle Tip to the SW100 Injector Gun. Make sure the small hole in the 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. [(See Fig. 1)] 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" 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. [(See Fig. 2)] 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.

Tree Species	Application Rates (Insertions Spaced Every 4 Inches)	
	Trees 18-30 inches CBH*	Trees >30 inches CBH*
Cottonwood ( <i>Populus deltoides</i> ), Eucalyptus ( <i>Eucalyptus</i> spp.), London plane tree ( <i>Platanus acerifolia</i> ), Maples [Bigleaf ( <i>Acer macrophyllum</i> ), Norway ( <i>Acer platanoides</i> ), Red ( <i>Acer rubrum</i> ) and Silver ( <i>Acer saccharinum</i> )] and Sycamore ( <i>Platanus occidentalis</i> )	0.5 to 1 ml	1 to 2 ml
Eucalyptus ( <i>Eucalyptus sideroxylon</i> )	0.5 ml	0.5 to 1 ml
Hackberry ( <i>Celtis occidentalis</i> ), Shamel ash ( <i>Fraxinus uhdei</i> ) and Water oak ( <i>Quercus nigra</i> )	2 ml	2 ml

\*Circumference at breast height.

**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.

When tree crown or leaf area is considered larger than normal, inject an amount in the higher suggested rate range. For trees with very small crowns or leaf area, inject an amount in the lower suggested rate range. Injection volume is dependent upon the tree size.



Cross-section of tree showing Wedgle Tip and WedgeChek

### 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](http://www.arborsystems.com)

Pinscher™ PGR, Direct-Inject™, Wedgle™ Tip and WedgeChek™ are trademarks of ArborSystems, LLC

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 market labeling





June 18, 2003

Mr. Rick Keigwin, Product Manager 22  
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. Keigwin:

**Subject:** ArborSystems, LLC  
Pinscher PGR  
EPA Reg. No. 69117-7

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 299459]
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; we are also updating the Disposal directions per PR Notice 2001-6.

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, SC, APC, Manager  
Consultant/Agent

Attachments

pc: ASI - Doolittle, C.

3085o Rocky Road  
Greely, CO 80631-9375  
970-352-0611  
970-353-0613 Fax  
regwestco@aol.com