

69117-7

5-17-2004

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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 type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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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>Cynthia Giles-Parker</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> <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> 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.	<b>NOTIFICATION</b>  <b>MAY 17 2004</b>
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**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

**Submit label revision notification per PR Notice 98-10  
(Refer to the attached Reference Label for an illustration of all changes)**

*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**

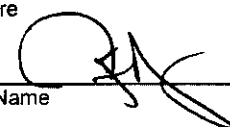
1. <b>Material This Product Will Be Packaged In:</b>			
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type 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		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. <b>Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).</b>		
Name <b>Kim Davis, CC, APC, Manager</b>	Title <b>Consultant/Agent</b>	Telephone No. (Include Area Code) <b>(970) 353-0611 / kim@regwest.com</b>

**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 <b>Consultant/Agent</b>	6. Date Application Received <b>(Stamped)</b>
4. Typed Name <b>Kim Davis, CC, APC, Manager</b>	5. Date <b>May 10, 2004</b>	

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(Box Label)

# PINSCHER™ PGR

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

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**

**MAY 17 2004**

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

**Net Wt. 4 oz. (120 ml)**

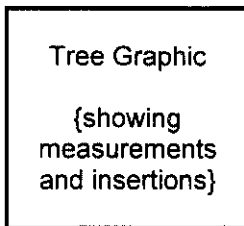
**DIRECTIONS FOR USE**

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 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.

**Storage:** Store in a tightly closed container in a cool, dry place. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Disposal:** Triple rinse, or equivalent, then dispose of in an incinerator or landfill approved for pesticide containers.

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Sold by  
**ArborSystems™**  
www.ArborSystems.com

{Container Label}

**PINSCHER™ PGR**  
**For Use on Broadleaf Trees to Retard the Growth of Certain Landscape Ornamentals**  
**Reduces the Frequency of Manual Pruning**  
**For Use By Professional Arborists/Applicators with the ArborSystems™ Wedgle™ Direct-Inject™**  
**Tree Treatment System**

**Active Ingredient:**

Dikegulac-sodium* (CAS No. 52508-35-7) .....	18.5%
<b>Other Ingredients</b> .....	<b>81.5%</b>
<b>Total</b> .....	<b>100.0%</b>

\*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 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.

**Storage:** Store in a tightly closed container in a cool, dry place. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Disposal:** Triple rinse, or equivalent, then dispose of in an incinerator or landfill approved for pesticide containers.

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

Sold by  
**ArborSystems™**  
www.ArborSystems.com

{Insert}

**PINSCHER™ PGR**  
**For Use on Broadleaf Trees to Retard the Growth of Certain Landscape Ornamentals**  
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**Keep Out of Reach of Children**  
**CAUTION**  
**See inside for additional precautionary statements.**

Net Contents 4 oz. (120 ml)

EPA Reg. No. 69117-7

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 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 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 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 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 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 ArborSystems Wedgle™ Direct-Inject Tree Treatment System.

The ArborSystems™ Tree Treatment System injects pesticides or micronutrients into a tree with minimal wounding. The system will inject chemicals into the area of bark separation where the chemical can be actively transferred to other parts of the tree. 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.

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  $\frac{3}{4}$  to fully developed and before shoot growth begins. Broadleaf evergreens may be treated during seasonal growth flushes.

**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 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  $\frac{1}{2}$  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. 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.

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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 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 6 – 10 inches DBH	Trees >10 inches DBH
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

**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. The volume is determined by measuring the diameter of the tree at breast height (DBH) and utilizing one of the following formulas:

Number of Injection Sites	Total Injection Volume (TIV) (in ml)	Volume per Injection Site
For trees 6 to 16 inches DBH	3 TIV = (DBH) <sup>2</sup> x 1.59	TIV ÷ 3
For trees greater than 16 inches DBH	6 TIV = DBH x 26.26	TIV ÷ 3



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. **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 dispose of in an incinerator or landfill approved for pesticide containers.

**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.

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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, Wedge™ Direct-Inject™, Wedge™ 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

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NOTIFICATION

# PINSCHER™ PGR

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

# PINSCHER™ PGR

For Use on Broadleaf Trees to Retard the Growth of Certain Landscape  
Ornamentals. Reduces the Frequency of Manual Pruning.  
For Use by Professional Arborists/Applicators with the  
ArborSystems Wedgle™ Direct-Inject™ Tree Treatment System.

**ACTIVE INGREDIENT:**

Dikegulac-sodium* (CAS No. 52508-35-7) .....	18.5%
<b>OTHER INGREDIENTS</b> .....	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 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.  
**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 dispose of in an incinerator or landfill approved for pesticide containers.

Net Contents 4 oz. (120 ml)  
EPA Reg. No. 69117-7 EPA Est. 69117-NE-1





## PINSCHER™ PGR

For Use on Broadleaf Trees to Retard the Growth of Certain Landscape Ornamentals. Reduces the Frequency of Manual Pruning.  
For Use by Professional Arborists/Applicators with the ArborSystems Wedgie™ Direct-Inject™ Tree Treatment System.

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

### DIRECTIONS FOR USE

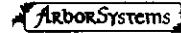
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Net Wt. 4 oz. (120 ml) EPA Reg. No. 69117-7 EPA Est. 69117-NE-1

Sold by



www.ArborSystems.com

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**PINSCHER™ PGR**

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Sold by



P.O. Box 34645 • 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>
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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.

**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**

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For Use By Professional Arborists/Applicators

**GENERAL INFORMATION**

**Do Not Inject Food Bearing Trees**  
ArborSystems Wedgie™ Direct-Inject™ Tree Treatment System using the patented Wedgie™ 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. May be used in sunny or overcast conditions. 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. 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 five days.

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. 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. 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 3/4 to fully developed and before shoot growth begins. Broadleaf evergreens may be treated during seasonal growth flushes.

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

**Note:** When using PINSCHER™ PGR, the ArborSystems Wedgie™ Direct-Inject™ Tree Treatment System must be cleaned periodically to prevent clogging.

**PINSCHER™ PGR**

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

**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 Wedgie™ Direct-Inject™ Tree Treatment System using the patented Wedgie™ 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. May be used in sunny or overcast conditions. 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. 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 five days.

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. 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. 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 3/4 to fully developed and before shoot growth begins. Broadleaf evergreens may be treated during seasonal growth flushes.

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

**Note:** When using PINSCHER™ PGR, the ArborSystems Wedgie™ Direct-Inject™ Tree Treatment System must be cleaned periodically to prevent clogging.

**PINSCHER™ PGR**

For Use on Broadleaf Trees to Retard the Growth of Certain Landscape Ornamentals.  
Reduces the Frequency of Manual Pruning.  
For Use by Professional Arborists/Applicators with the ArborSystems Wedgie™ Direct-Inject™ Tree 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 inside for additional precautionary statements.

Net Contents 4 oz. (120 ml)

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

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www.ArborSystems.com

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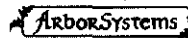
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**Precaution:** Do not inject PINSCHER™ PGR into drought-stressed trees or trees that do not appear healthy.

**Note:** When using PINSCHER™ PGR, the ArborSystems Wedgie™ Direct-Inject™ Tree Treatment System must be cleaned periodically to prevent clogging.

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**HOW TO USE THE ARBORSYSTEMS WEDGE™ DIRECT-INJECT™ TREE TREATMENT SYSTEM:**

1. Use protective eyewear and rubber or neoprene gloves when handling or installing the ArborSystems Wedge™ Direct-Inject™ Tree Treatment System.
2. Attach the chemical bottle to the Wedge™ Direct-Inject™ Unit.
3. Attach the Wedge™ Tip to the Wedge™ 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 1/2 ml, as appropriate.
4. Determine the thickness of the bark. Insert the Wedge™ 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" 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 bars on the WedgeChek™ will secure it in the tree.
7. Insert the Wedge™ 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 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 6-10 Inches DBH	Trees >10 Inches DBH
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

**Note:** Depending on type of bark, the dosage per injection site may have to be reduced to 1/2 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. The volume is determined by measuring the diameter of the tree at breast height (DBH) and utilizing one of the following formulas:

Number of Injection Sites	Total Injection Volume (TIV) (in ml)	Volume per Injection Site
For trees 6 to 16 inches DBH	3 TIV = (DBH) x 1.59	TIV ÷ 3
For trees greater than 16 inches DBH	6 TIV = DBH x 25.25	TIV ÷ 3

**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. **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 dispose of in an incinerator or landfill approved for pesticide containers.

**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.



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PC\_M\_04-106

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1. Use protective eyewear and rubber or neoprene gloves when handling or installing the ArborSystems Wedge™ Direct-Inject™ Tree Treatment System.
2. Attach the chemical bottle to the Wedge™ Direct-Inject™ Unit.
3. Attach the Wedge™ Tip to the Wedge™ 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 1/2 ml, as appropriate.
4. Determine the thickness of the bark. Insert the Wedge™ 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" 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 bars on the WedgeChek™ will secure it in the tree.
7. Insert the Wedge™ 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 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 6-10 Inches DBH	Trees >10 Inches DBH
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

**Note:** Depending on type of bark, the dosage per injection site may have to be reduced to 1/2 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. The volume is determined by measuring the diameter of the tree at breast height (DBH) and utilizing one of the following formulas:

Number of Injection Sites	Total Injection Volume (TIV) (in ml)	Volume per Injection Site
For trees 6 to 16 inches DBH	3 TIV = (DBH) x 1.59	TIV ÷ 3
For trees greater than 16 inches DBH	6 TIV = DBH x 25.25	TIV ÷ 3

**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. **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 dispose of in an incinerator or landfill approved for pesticide containers.

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4. Determine the thickness of the bark. Insert the Wedge™ 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" 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 bars on the WedgeChek™ will secure it in the tree.
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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.
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PC\_M\_04-106

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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" 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 bars on the WedgeChek™ will secure it in the tree.
7. Insert the Wedge™ 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 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 6-10 Inches DBH	Trees >10 Inches DBH
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

**Note:** Depending on type of bark, the dosage per injection site may have to be reduced to 1/2 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. The volume is determined by measuring the diameter of the tree at breast height (DBH) and utilizing one of the following formulas:

Number of Injection Sites	Total Injection Volume (TIV) (in ml)	Volume per Injection Site
For trees 6 to 16 inches DBH	3 TIV = (DBH) x 1.59	TIV ÷ 3
For trees greater than 16 inches DBH	6 TIV = DBH x 25.25	TIV ÷ 3

**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. **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 dispose of in an incinerator or landfill approved for pesticide containers.

**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.



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PKS0508™, PDR, 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.

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May 10, 2004



Ms. Cynthia Giles-Parker, Product Manager 22  
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 Ms. Giles-Parker:

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

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. 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 redundant and the remaining placement is a much better location.

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, CC, APC, Manager  
Consultant/Agent

Attachments

pc: ASI - Doolittle, C.

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