

69117-10

10/24/2013

1/20



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Kimerlee Young
RegWest Company, LLC
8023 West 20th Street, Suite A
Greeley, CO 80634

OCT 24 2013

Subject: Terrier Systemic Antibiotic
EPA Reg. No. 69117-10
Notification dated: 9/13/13
EPA Decision No.: 483560

Dear Ms. Young:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10.

The Agency acknowledges your addition of a third container size (2 fl. oz). The label submitted with the application has been stamped "Notification" and will be placed in our records.

Sincerely,

A handwritten signature in cursive script that reads "Shaja B. Joyner".

Shaja B. Joyner
Product Manager 20
Fungicide Branch
Registration Division (7504P)

Enclosed: Stamped accepted label



United States
Environmental Protection Agency
 1200 Pennsylvania Avenue, N.W.
 Washington, DC 20460-0001

- Registration
- Amendment
- Other

OPP Identifier Number

Notification

Application for Pesticide – Section I

1. Company/Product Number <p style="text-align: center;">69117-10</p>	2. EPA Product Manager <p style="text-align: center;">Driss Benmhend</p>	3. Proposed Classification <p style="text-align: center;"><input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted</p>
4. Company/ Product (Name) <p style="text-align: center;">TERRIER™ Systemic Antibiotic</p>	PM # <p style="text-align: center;">20</p>	
5. Name and Address of Applicant (Include ZIP Code) ArborSystems, Inc. d/b/a ArborSystems c/o RegWest Company, LLC 8203 West 20th Street, Suite A Greeley, CO 80634-4696 <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.
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of Additional Container Size (2 fl oz [60 ml]).

Notification of label change per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46. 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 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:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____
*Certification must be submitted		If "Yes" Unit Packaging Wt. No. Per Container	If "Yes" Packaging Wt. No. Per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container <p style="text-align: center;">4 fl. oz. (120 ml); 2 fl oz (60 ml); and 1 qt. 2 fl. oz. (1000 ml)</p>		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" 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 checked="" type="checkbox"/> Other Self-adhesive; printed boxes			

Section - IV

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

Name Kimberlee Young (formerly: Kim Davis)	Title Consultant/Agent	Telephone No. (Include Area Code) (970) 353-0611 kim@regwest.com
------------------------------------------------------	----------------------------------	--------------------------------------------------------------------------------------

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete, and I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received
(Stamped)

2. Signature 	3. Title Consultant/Agent
4. Typed Name Kimberlee Young (formerly: Kim Davis)	5. Date September 13, 2013

FedEx

FTN 8029 4461 7478

3/20

9/20

Notification of Additional Container Size



RegWest Company, LLC

September 13, 2013

Mr. Driss Benmhend, Product Manager 20
Document Processing Desk -NOTIF
Office of Pesticide Programs - 7504P
U.S. Environmental Protection Agency
One Potomac Yard (South Building), Room S-4900
2777 South Crystal Drive
Arlington, VA 22202

Dear Mr. Benmhend:

Subject: ArborSystems, Inc., d/b/a ArborSystems
TERRIER™ System Antibiotic
EPA Reg. No. 69117-10

On behalf of **ArborSystems**, RegWest Company, LLC is submitting the attached materials as a notification submission of an additional container size. RegWest will act as sole agent in this endeavor.

Attached are the following items:

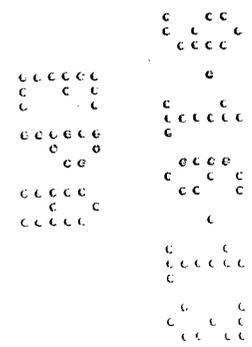
- 1. Application for Pesticide: **Other (Notification)**
- 2. One **Reference Label** (illustrating the additional size)
- 3. ~~One~~ **New Label** (incorporating the additional size)

We are adding a third container size of 2 fl oz (60 mls).

Please contact me 970.353.0611 or kim@regwest.com if you have any questions or require additional information.

Regards,
RegWest Company, LLC


Kimberlee Young
(formerly: Kim Davis),
Consultant/Agent



Attachments

cc: ASI - Doolittle, C.

8203 West 20th St., Suite A
Greeley, CO 80634-4696
p 970.353.0611
f 970.353.0613
www.regwest.com

{Subpart A Label: For Use on Trees Excluding Palms}

TERRIER™ Systemic Antibiotic

{Affixed Booklet – Front Panel}

TERRIER™ Systemic Antibiotic

For suppression of certain diseases including bacterial leaf scorch,
fire blight, yellows diseases and phloem necrosis on ornamental trees.

An ArborSystems™ Direct-Inject™ Chemical

Active Ingredient:

Oxytetracycline hydrochloride	4.3%
Other Ingredients	95.7%
Total	100.0%

Net Contents: 4 fl. oz. (120 ml)
[Net Contents: 2 fl oz (60 ml)]
[Net Contents: 1 qt. 2 fl. oz. (1000 ml)]

**Keep Out of Reach of Children
CAUTION**

See inside for First Aid, additional Precautionary Statements and complete Directions for Use.

Use within 6 months of the container-stamped packaged date.

{Affixed Booklet – inside pages}

TERRIER™ Systemic Antibiotic

For suppression of certain diseases including bacterial leaf scorch,
fire blight, yellows diseases and phloem necrosis on ornamental trees.

An ArborSystems™ Direct-Inject™ Chemical
•Easy •No drilling •Saves time and money

Intended for use by arborists/applicators, grounds maintenance personnel and landscapers.

To be used only with the ArborSystems Wedgle® Direct-Inject™ Tree Injection System

[Sold by:]

ArborSystems™

The No-Drill Injection Solution

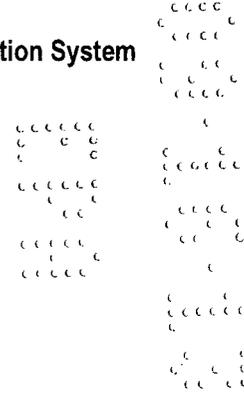
[800-698-4641] • [Fax: 402-339-5011]

P.O. Box 34645 • Omaha, NE 68134

Net Contents: 4 fl. oz. (120 ml)
[Net Contents: 2 fl oz (60 ml)]
[Net Contents: 1 qt. 2 fl. oz. (1000 ml)]

NOTIFICATION

OCT 24 2013



EPA Reg. No. 69117-10

EPA Est. 69117-NE-1

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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticide Information Center (NPIC) at 1.800.858.7378, seven days a week, 6:30 am-4:30 pm Pacific Time (NPIC website: www.npic.orst.edu).

Note to Physician: There is no specific antidote available. Treat patient symptomatically.

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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with skin or clothing. Causes moderate eye irritation. Thoroughly wash with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride (PVC), Viton, Selection Category C). Avoid contact with eyes or clothing. Wear protective eyewear such as goggles or shielded safety glasses. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

Personal Protective Equipment

Some materials that are chemical-resistant to this product are listed below. Applicators and other handlers must wear: Long-sleeved shirt and long pants, shoes plus socks, chemical-resistant gloves, such as polyethylene, butyl rubber, neoprene rubber or Viton and protective eyewear such as goggles, face shield or safety glasses.

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Immediately remove clothing/PPE if pesticide gets inside; then thoroughly wash and put on clean clothing.
- Immediately remove PPE after handling this product. Wash the outside of gloves before removing. As soon as possible, thoroughly wash and change into clean clothing.

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 or rinsate.

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Physical or Chemical Hazards

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers and restricted-entry interval. The requirements in this box only apply to users of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear: coveralls over long-sleeved shirts and long pants, chemical-resistant gloves made of any waterproof material, shoes and socks.

ArborSystems™ Wedgle® Direct-Inject™ Tree Injection System

The ArborSystems™ Wedgle® Direct-Inject™ Tree Injection System is a no-drill trunk injection method that is easy to use. Most trees are treated in as little as 5 minutes or less, allowing applicators to treat trees quickly. There is no need to wait for absorption (translocation); chemical is injected into the cambial area (the active vascular system) of the tree. Because the chemical is placed right where the tree can use it, effectiveness of the chemical is increased. Use in sunny or overcast conditions, rainy or dry, at any time of day. As no drilling or implants are required, you can treat trees year after year, with no threat of long-term or permanent damage to the tree. This system minimizes wounding and promotes long-term tree health and vigor.

Restrictions

This product is not to be used on trees or shrubs that will produce food within the year following treatment; during the year following treatment, do not use any part of treated trees or shrubs, including sap, as food or feed. Do not inject trees that are less than two inches in diameter.

Product Information

TERRIER™ Systemic Antibiotic [This product] is a ready-to-use antibiotic for non-crop bearing ornamental trees and large woody shrubs. TERRIER™ Systemic Antibiotic [This product] provides seasonal suppression of a variety of diseases including bacterial leaf scorch, fire blight, yellows diseases, phloem necrosis, mycoplasmas, xylem-limited bacteria (*Xylella fastidiosa*, BLS) and some bacterial blight diseases. Late summer or early fall applications provide disease suppression the following season. Some diseases may require repeated yearly application.

Preventative application is more effective than therapeutic treatment in trees showing disease symptoms. Apply as a preventative when other trees in the area are showing symptoms. In trees showing symptoms, begin treatment as soon as possible. Trees in advanced stages of disease development may not respond to treatment. Infected trees will absorb the chemical more slowly due to the vascular damage caused by the disease. If TERRIER™ Systemic

Antibiotic [this product] is not absorbed within 24 hours, the tree is considered high risk and has a poor chance of survival.

Dosage

Inject 1 to 2 ml per every 4" of trunk circumference measured within 12" of the ground using the Wedgle Direct-Inject Tree Injection System. Use Portle® Tips for injecting Sycamores or thick-barked hardwoods such as elms. For other trees, use Wedgle® Tips. Make all injections around the base (or flare) of the tree.

Diseases treated	Application Timing	
Bacterial Leaf Scorch in Elm, Oak, Sycamore, Oleander, Sweet Gum (Liquidambar) ^[1]	Apply in late summer or early fall for preventive suppression the following season. Applications made in spring (April or May) will suppress current year symptoms.	
Fire Blight in Mountain Ash	Applications are most successful when made in early spring (January through May depending upon location) prior to or during bloom period. Applications made after bloom period will still prevent secondary twig infections. Fall applications are NOT recommended for fire blight suppression.	
Ash Yellows in Ash	Applications for treatment of ash yellows are most successful in the spring and early summer when leafout has reached at least 50% or more as adequate foliage is needed to assure translocation.	
Phloem Necrosis in Elm, also called Elm Yellow. ^[2]	If phloem necrosis has been identified in nearby trees it is preferable to treat unaffected trees in late summer or early fall for preventive suppression the following season. Applications made in spring MAY suppress current year symptoms, however results on trees with symptoms is inconsistent.	

[Disease notes

- Bacterial Leaf Scorch (BLS)** is a bacterial plant disease caused by a vascular clogging bacterium (*Xylella fastidiosa*) that rapidly multiplies within active plant xylem. Distinct scorch-like leaf symptoms are followed by twig and branch death leading to plant decline and death. BLS bacterium is spread from diseased to healthy plant material during feeding by common urban xylem-feeding insects such as leafhoppers and treehoppers.
- Elms with phloem necrosis** exhibit leaves which turn yellow (out of season) and may drop prematurely. On trees that survive over winter, leaves in the spring are small and sparse. Symptoms are quite similar to Dutch Elm Disease, however it is important to distinguish between the two diseases as treatments are different. In Elms with phloem necrosis the entire crown is likely to show symptoms at the same time with symptoms appearing from July to late September. With Dutch Elm Disease, usually one or several small branches in the upper crown show earlier symptoms, which may appear anytime during the growing season.

**How to Apply ArborSystems Direct-Inject Chemicals
with ArborSystems Wedgle® Direct-Inject Tree Injection System**

- Use only ArborSystems Direct-Inject chemicals with your unit as they have been formulated specifically for the Wedgle Direct-Inject System.

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2. Measure the circumference of the tree within 12" of the ground. Follow the label directions and application dosages in this booklet to determine the number of injection sites and the amount of chemical to be injected at each site.
3. Choose which style and length of ArborSystems Injection Tip is most appropriate for type of tree you are treating.
4. The injection unit is preset to deliver a 1 ml dose of chemical with each full stroke of the handles. If you need to inject a .5 ml dose of chemical, move the dose adjustment ring to the .5 ml dose adjustment groove.
5. Make injections working around base (or flare) of the tree. All injections should be made within 12" of the ground unless otherwise noted.
6. With a smooth motion, firmly squeeze the injection unit handles to deliver chemical into tree. Apply equal pressure on both handles—unequal pressure may bend or break the tip.
7. Continue making injections moving around the tree until the entire tree trunk has been treated.
8. When removing tips from the tree, use a straight rearward motion. Avoid rocking motions as that may damage tips or the injection unit.
9. Tips should be cleaned after each use by submerging in alcohol or diluted bleach.
10. At the end of the day, water flush the Wedgle Direct-Inject unit to prevent clogging.

Avoiding chemical waste: Any time you remove a chemical pack (after making injections), there is approximately 2.5 ml of chemical retained in the injection unit. To avoid wasting this chemical, remove the chemical pack before making your final injections. You will be able to make two additional 1 ml doses with the chemical remaining in the injection unit.

Storage and Disposal

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

Pesticide Storage: Store in a cool (>45°F) place with containers in an upright position. Do not expose material to temperatures (>85°F) for prolonged periods. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Non-refillable container; do not reuse or refill this container. Completely empty pack into application equipment, then offer for recycling, if available, or dispose of empty pack in a sanitary landfill or by incineration.

{Per PR Notice 2007-4 Batch Code/Lot Number will appear either on the label or the container.}

Notice of Warranty

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

[Sold by:]

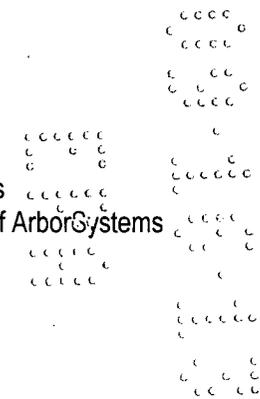
ArborSystems™

The No-Drill Injection Solution

[800-698-4641] • [Fax: 402-339-5011]

P.O. Box 34645 • Omaha, NE 68134

Wedgle® and Portle® are registered trademarks of ArborSystems
ArborSystems™, Terrier™, Direct-Inject™ and WedgeChek™ are trademarks of ArborSystems
Direct-Inject™ unit is protected by U.S. Patent #5,901,498
Wedgle® Tip is protected by U.S. Patent #5,239,773
WedgeChek™ is protected by U.S. Patent #5,797,215
Portle® Tip is protected by U.S. Patent #7,178,286



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{Box Label}

TERRIER™ Systemic Antibiotic

For suppression of certain diseases including bacterial leaf scorch, fire blight, yellows diseases and phloem necrosis on ornamental trees.

An ArborSystems™ Direct-Inject™ Chemical

•Easy •No drilling •Saves time and money

Active Ingredient:

Oxytetracycline hydrochloride	4.3%
Other Ingredients	95.7%
Total	100.0%

Keep Out of Reach of Children

CAUTION

See booklet for First Aid, additional Precautionary Statements and complete Directions for Use.

Use within 6 months of the container-stamped packaged date.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

The ArborSystems Wedgle Direct-Inject unit is designed to be used only with ArborSystems pre-packed chemicals. Tampering with packs or contents may cause non-warranted damage to your injection system.

Storage and Disposal

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

Pesticide Storage: Store in a cool (>45°F) place with containers in an upright position. Do not expose material to temperatures (>85°F) for prolonged periods. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Non-refillable container; do not reuse or refill this container. Completely empty pack into application equipment, then offer for recycling, if available, or dispose of empty pack in a sanitary landfill or by incineration.

{Per PR Notice 2007-4 Batch Code/Lot Number will appear either on the label or the container.}

Net Contents: 4 fl. oz. (120 ml)
[Net Contents: 2 fl oz (60 ml)]
[Net Contents: 1 qt. 2 fl. oz. (1000 ml)]

EPA Reg. No. 69117-10

EPA Est. 69117-NE-1

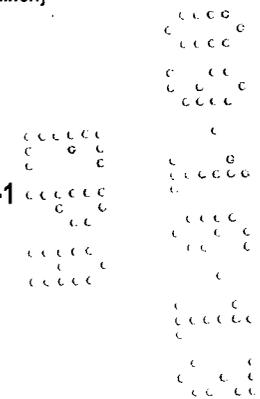
[Sold by:]

ArborSystems™

The No-Drill Injection Solution

[800-698-4641] • [Fax: 402-339-5011]

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10/
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{Pack Label}

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Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers and restricted-entry interval. The requirements in this box only apply to users of this product that are covered by the Worker Protection Standard.

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For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear: coveralls over long-sleeved shirts and long pants, chemical-resistant gloves made of any waterproof material, shoes and socks.

The ArborSystems Wedgle Direct-Inject unit is designed to be used only with ArborSystems pre-packed chemicals. Tampering with packs or contents may cause non-warranted damage to your injection system.

11/20

Storage and Disposal

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

Pesticide Storage: Store in a cool (>45°F) place with containers in an upright position. Do not expose material to temperatures (>85°F) for prolonged periods. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Non-refillable container; do not reuse or refill this container. Completely empty pack into application equipment, then offer for recycling, if available, or dispose of empty pack in a sanitary landfill or by incineration.

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EPA Est. 69117-NE-1

[Sold by:]

ArborSystems™

The No-Drill Injection Solution

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P.O. Box 34645 • Omaha, NE 68134

[] Denotes alternate/optional language
{ } Denotes language that does not appear on market labeling

{Additional Selling/Marketing Copy for use in conjunction with promotional pieces: brochures; on the website; and in other promotional materials, displays, etc.}

ArborSystems™ Wedgle® Direct-Inject™ System

The ArborSystems Wedgle® Direct-Inject Tree Injection System is effective. Chemicals are injected directly into the tree. Because the chemical is placed right where the tree can use it, effectiveness of the chemical is increased and control of most problems can be seen in as little as three to five days. Also, because no chemical is lost in non-active wood, the Direct-Inject System allows you to use less chemical to achieve high levels of effectiveness; this saves money and reduces chemical waste. The Direct-Inject System injects chemicals into a tree with minimal wounding. With no holes to drill, no air or pathogens are allowed to enter the tree, potential decay never starts and long-term wounding is prevented. The tree's ability to move water and nutrients, and to store food, is not compromised.

Pre-mixed chemicals are supplied in self-sealing containers. After injections have been made, 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.

With no drilling required the ArborSystems Direct-Inject System:

- Minimizes wounding to keep out diseases, fungi, bacteria and insects.
- Prevents air from getting into the tree. When air is allowed into a tree's vascular system, it cuts off the flow of water and nutrients.
- Allows multiple or annual treatments without damaging the tree.
- Requires no drills, power supply or other bulky equipment.

With this system and chemicals, tree care experts effectively combat and manage many of the most devastating environmental plant threats.

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{Subpart B Label: For Use on Palms}

TERRIER™ Systemic Antibiotic

{ABN: SPRINGER™ Systemic Antibiotic}

{Affixed Booklet – Front Panel}

TERRIER™ Systemic Antibiotic

For seasonal suppression of lethal yellows (phytoplasma disease) on palms.

An ArborSystems™ Direct-Inject™ Chemical

•Easy •No drilling •Saves time and money

Active Ingredient:

Oxytetracycline hydrochloride	4.3%
Other Ingredients	95.7%
Total	100.0%

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Keep Out of Reach of Children

CAUTION

See inside for First Aid, additional Precautionary Statements and complete Directions for Use.

Use within 6 months of the container-stamped packaged date.

{Affixed Booklet – inside pages}

TERRIER™ Systemic Antibiotic

For seasonal suppression of lethal yellows (phytoplasma disease) on palms.

An ArborSystems™ Direct-Inject™ Chemical

•Easy •No drilling •Saves time and money

Intended for use by arborists/applicators, grounds maintenance personnel and landscapers.

To be used only with the ArborSystems Wedgle® Direct-Inject™ Tree Injection System

[Sold by:]

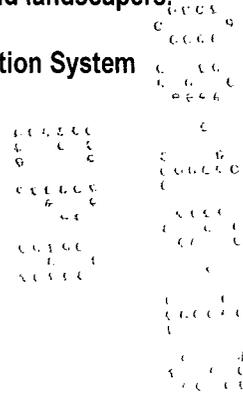
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EPA Est. 69117-NE-1

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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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. For emergency information concerning this product, call the National Pesticide Information Center (NPIC) at 1.800.858.7378, seven days a week, 6:30 am-4:30 pm Pacific Time (NPIC website: www.npic.orst.edu).</p>	
<p>Note to Physician: There is no specific antidote available. Treat patient symptomatically.</p>	

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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with skin or clothing. Causes moderate eye irritation. Thoroughly wash with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride (PVC), Viton, Selection Category C). Avoid contact with eyes or clothing. Wear protective eyewear such as goggles or shielded safety glasses. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

Personal Protective Equipment

Some materials that are chemical-resistant to this product are listed below. Applicators and other handlers must wear: Long-sleeved shirt and long pants, shoes plus socks, chemical-resistant gloves, such as polyethylene, butyl rubber, neoprene rubber or Viton and protective eyewear such as goggles, face shield or safety glasses.

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Immediately remove clothing/PPE if pesticide gets inside; then thoroughly wash and put on clean clothing.
- Immediately remove PPE after handling this product. Wash the outside of gloves before removing. As soon as possible, thoroughly wash and change into clean clothing.

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 or rinsate.

Physical or Chemical Hazards
Do not use or store near heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers and restricted-entry interval. The requirements in this box only apply to users of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, wear: coveralls over long-sleeved shirts and long pants, chemical-resistant gloves made of any waterproof material, shoes and socks.

ArborSystems™ Wedgle® Direct-Inject™ Tree Injection System

The ArborSystems™ Wedgle® Direct-Inject™ Tree Injection System, along with ArborSystems patented Portle® Tips and Palm Tips, is the ideal way to treat palms. This no-drill trunk injection method is easy to use. Palm and Portle Tips have been designed to penetrate the thick outer husks of palms. Several tip options are available allowing you to choose the tip best suited to treat palms of various husk density.

Most palms can be treated in as little as five minutes or less, allowing applicators to make treatments quickly. There is no need to wait for absorption (translocation); chemical is injected into the active portion of the palm without drilling. Because the chemical is placed right where the palm can use it, effectiveness of the chemical is increased. Use in sunny or overcast conditions, rainy or dry, at any time of day. As no drilling or implants are required, you can treat palms repeatedly with no threat of long-term or permanent damage. This system minimizes wounding and promotes long-term plant health and vigor.

Restrictions

This product is not to be used on palms that will produce food within the year following treatment. Do not use any part of treated palms as food or feed.

Product Information

TERRIER™ Systemic Antibiotic [This product] is a ready-to-use antibiotic for use on palms. TERRIER™ Systemic Antibiotic [This product] provides suppression of lethal yellows disease (*phytoplasma* disease) in palms.

Symptoms

Symptoms vary significantly based on the palm species, but generally occur in sequence; fruit drop; flower/seed wilt, excessive yellowing of the canopy starting with the newest fronds and finally death of the palm bud leading to death of the entire plant. Sometimes a younger frond will yellow early in the process. This "flag leaf" is often an early visual symptom, but not present in every case.

Treatment

Preventative treatments are more effective than therapeutic treatment in palms showing disease symptoms.

As a therapeutic measure, immediately begin applications to palms exhibiting symptoms and continue on a 3- to 4-month treatment schedule. Palms with over 25% discolored leaves are unlikely to respond to treatment.

Preventive treatments are recommended to protect palms in areas where lethal yellowing is known or likely to occur. Apply preventive treatments any time during the growing season once every 3 to 4 months.

Tree	Disease	Dosage per Injection Site
Palm	For suppression of Palm Lethal Yellows disease (<i>Phytoplasma</i> disease)	6 ml per 6" of trunk circumference measured at chest height.

{Optional paragraph format}

Palm: For suppression of palm lethal yellows: Apply 6 ml of TERRIER™ Systemic Antibiotic [this product] per 6" of trunk circumference measured at chest height.

[Palms Susceptible to Lethal Yellowing	
This chart is only intended as a general guide. Susceptibility may vary depending on your location and evolving conditions. Contact a trained arborist familiar with conditions in the area to determine treatment strategies.	
High susceptibility	Coconut Palm, all cultivars, <i>Cocos nucifera</i> Christmas Palm, <i>Adonidia merrilli</i> Loula/Konna Palm, <i>Pritchardia affinis</i> Thurston Fan Palm, <i>Pritchardia thurstonii</i> Tonga/Figi Fan Palm, <i>Pritchardia pacifica</i>
High/medium susceptibility	Canary Island Date Palm, <i>Phoenix canariensis</i> Clustering Fishtail Palm, <i>Caryota mitis</i> Medjool Date Palm, <i>Phoenix dactylifera</i> Sylvester/Wild Date Palm, <i>Phoenix sylvestris</i>
Medium susceptibility	Aricuriroba, <i>Syragus schizophylla</i> Palmyra Palm, <i>Borassus flabellifer</i> Princess Palm, <i>Dictosperma album</i> Senegal Date Palm, <i>Phoenix reclinata</i> Windmill Palm, <i>Trachycarpus fortunei</i>
Medium/low susceptibility	Chinese Fan Palm, <i>Livistonia chinensis</i> Latan Palm, <i>Latania lontaroides</i> Queen Palm, <i>Syragus romanzoffiana</i> Spindle Palm, <i>Hyophorbe verschaffeltii</i>
Low susceptibility	Washingtonia/Mexican Fan, <i>Washingtonia robusta</i> Triangle Palm, <i>Dypsis decaryi</i>
Undetermined level of susceptibility	Belmore Sentry, Cabada, Cabbage/Sabal, Cliff Date, Footstool, Gebang/Buri, Giant Fishtail, Kentia, Mazari, Miniature Sugar, Palma De Lluvia, Rootspine, Seashore
Species thought to be resistant to Lethal Yellows	Bizmarckai, Foxtail, Royal, Solitaire]

{Information in above chart may be used selectively.}

How to Inject Palms with ArborSystems Wedgle® Direct-Inject Tree Injection System

1. Use only ArborSystems Direct-Inject chemicals with your unit as they have been formulated specifically for the Wedgle Direct-Inject System.
2. Measure the circumference of the palm at chest height. Follow the label directions and application dosages in this booklet to determine the number of injection sites and the amount of chemical to be injected at each site.
3. Palms are treated using ArborSystems Palm or Portle Injection Tips, depending on the husk density. Choose which injection tips will work best for the palm you are treating and attach the appropriate tip to the ArborSystems Tip Setter. Using multiple tips will speed the injection process.
4. At chest height, tap the injection tip into the palm using the Tip Setter, then disconnect the setter from the tip leaving the tip in the palm. Repeat until all tips are set in the palm. **Do not attempt to insert or remove tips with the injection unit as that is likely to damage the injection unit.**
5. Connect the Wedgle Direct-Inject unit to one of the tips already inserted in the palm.
6. With a smooth motion, firmly squeeze the injection unit handles. Apply equal pressure on both handles—unequal pressure may bend or break the tip. The injection unit is preset to deliver a 1 ml dose of chemical with each full stroke of the handles. Repeat until the required amount of chemical has been injected at the injection site.
7. Remove the injection unit from the tip leaving the tip in the palm.
8. Move to the next tip and attach the injection unit to the tip. Continue making injections at all injection sites. After all injections have been completed, use the Tip Setter to remove the tips from the palm. When removing tips from the tree, use a straight rearward motion. Avoid rocking motions as that may damage tips.
9. Clean tips after each use by submerging in alcohol or diluted bleach.
10. At the end of the day, water flush the Wedgle Direct-Inject unit to prevent clogging.

Avoiding chemical waste: Any time you remove a chemical pack (after making injections), there is approximately 2.5 ml of chemical retained in the injection unit. To avoid wasting this chemical, remove the chemical pack before making your final injections. You will be able to make two additional 1 ml doses with the chemical remaining in the injection unit.

Storage and Disposal

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

Pesticide Storage: Store in a cool (>45°F) place with containers in an upright position. Do not expose material to temperatures (>85°F) for prolonged periods. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Non-refillable container; do not reuse or refill this container. Completely empty pack into application equipment, then offer for recycling, if available, or dispose of empty pack in a sanitary landfill or by incineration.

{Per PR Notice 2007-4 Batch Code/Lot Number will appear either on the label or the container.}

Notice of Warranty

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

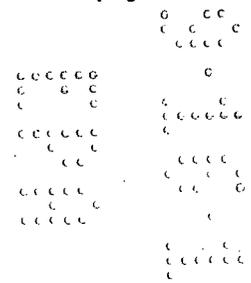
[Sold by:]

ArborSystems™

The No-Drill Injection Solution

[800-698-4641] • [Fax: 402-339-5011]

P.O. Box 34645 • Omaha, NE 68134



Wedgle® Tip is a registered trademark of ArborSystems™

ArborSystems™, Terrier™, Springer™, Direct-Inject™ and WedgeChek™ are trademarks of ArborSystems™

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Direct-Inject™ unit is protected by U.S. Patent #5,901,498
Wedge® Tip is protected by U.S. Patent #5,239,773
WedgeChek™ is protected by U.S. Patent #5,797,215
Portle® Tip is protected by U.S. Patent #7,178,286

{Box Label}

TERRIER™ Systemic Antibiotic

For seasonal suppression of lethal yellows (phytoplasma disease) on palms.

An ArborSystems™ Direct-Inject™ Chemical
•Easy •No drilling •Saves time and money

Active Ingredient:

Oxytetracycline hydrochloride	4.3%
Other Ingredients	95.7%
Total	100.0%

Keep Out of Reach of Children
CAUTION
See booklet for First Aid, additional Precautionary Statements and complete Directions for Use.

Use within 6 months of the container-stamped packaged date.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

The ArborSystems Direct-Inject units are designed to be used only with ArborSystems' pre-packed chemicals. Tampering with packs or contents may cause non-warranted damage to your injection system.

Storage and Disposal

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

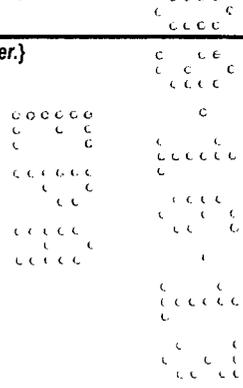
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Net Contents: 4 fl. oz. (120 ml)
[Net Contents: 2 fl oz (60 ml)]
[Net Contents: 1 qt. 2 fl. oz. (1000 ml)]

EPA Reg. No. 69117-10

EPA Est. 69117-NE-1



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[Sold by:]
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{Pack Label}

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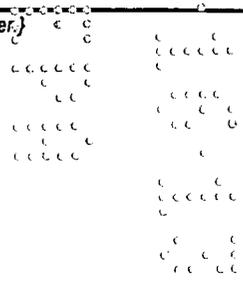
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[] Denotes alternate/optional language
{ } Denotes language that does not appear on market labeling

{Additional Selling/Marketing Copy for use in conjunction with promotional pieces: brochures; on the website; and in other promotional materials, displays, etc.}

ArborSystems™ Wedgle® Direct-Inject™ System

The ArborSystems Wedgle® Direct-Inject Tree Injection System is effective. Chemicals are injected directly into the active area of the palm. Because the chemical is placed right where the palm can use it, effectiveness of the chemical is increased. The Direct-Inject System injects chemicals into a palm with minimal wounding. With no holes to drill, no air or pathogens are allowed to enter, potential decay never starts and long-term wounding is prevented. The palm's ability to move water and nutrients, and to store food, is not compromised.

Pre-mixed chemicals are supplied in self-sealing containers. After injections have been made, 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.

With no drilling required the ArborSystems Direct-Inject System:

- Minimizes wounding to keep out diseases, fungi, bacteria and insects.
- Prevents air from getting into the palm. When air is allowed into a palm's active system, it cuts off the flow of water and nutrients.
- Allows multiple or annual treatments without damaging the palm.
- Requires no drills, power supply or other bulky equipment.

With this system and chemicals, tree care experts effectively combat and manage many of the most devastating environmental plant threats.

The ArborSystems Wedgle® Direct-Inject System is designed to preserve and protect the natural and urban forest. Treat almost any tree in five minutes or less. The Direct-Inject System is an efficient chemical delivery system. You achieve control with less chemical because chemical is placed precisely where the tree or palm can best use it.

ArborSystems Direct-Inject chemicals are integral parts of the Direct-Inject Tree Injection System. Use only ArborSystems Direct-Inject chemicals with the Wedgle Direct-Inject unit. Using unauthorized chemicals with the ArborSystems Direct-Inject System constitutes a violation of Federal law.

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