

74578-1

8/24/2009

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Jeff Jones
Arborjet, Inc.
c/o Delta Analytical Corp.
12510 Prosperity Dr. Suite 160
Silver Spring, MD 20904

AUG 24 2009

Dear Mr. Jones:

Subject: Labeling Amendment; Response to Agency Letter Dated August 11, 2009
Ima-Jet
EPA Registration No. 74578-1
Submission Date: August 13, 2009

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact me at (703) 306-0415.

Sincerely yours,

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure- Stamped Labeling

2007



IMA-jet

[Systemic Insecticide for Micro-Infusion]
[Arboriculture in Motion][Diverse Pest Control]

Microinjectable Systemic Insecticide for use with the Arborjet Injection System in the Management of Specific Insect Pests of Forests, Trees, Landscape Ornamentals & Interior Plantscapes

Active Ingredient:	
Imidacloprid, 1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....	5.0%
Other Ingredients	95.0%
.....	100.0%

ACCEPTED

AUG 24 2009

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 74578-1

STOP—read the entire label before use.

KEEP OUT OF REACH OF CHILDREN

WARNING

Precaución al usuario: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. To the user: If you cannot read or understand English, do not use this product until the label has been fully explained to you.

FIRST AID	
If Swallowed	<ul style="list-style-type: none"> • Call Poison Control Center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If 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 further treatment advice.
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a Poison Control Center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a Poison Control Center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the Infotrac Chemical Emergency Response System at 1-800-535-5053	
Note to Physician: No specific antidote is available. Treat the patient symptomatically.	

Manufactured by: Arborjet, Inc.
99 Blueberry Hill Road
Woburn, MA 01801
Phone: 781 935-9070

EPA Reg. No. 74578-1
EPA Est. No. 74578-MA-001

Net Contents: [1 Quart], [2.5 Gallons], [30 Gallons], [50 Gallons], [250 mL], [500 mL], [1000 mL]

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Harmful if swallowed, inhaled or absorbed through the skin. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Keep children and pets away from treatment area until injection and uptake are complete.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. This product is highly toxic to honeybees. Do not apply this product to pollen-shedding or nectar producing plants visited by honeybees while plant is in bloom.

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.

IMPORTANT: Read the entire label before use. Failure to follow label directions may result in poor control or plant injury. Failure to follow label directions may cause injury to people, animals and environment. The buyer accepts and understands that failure to follow label directions is the responsibility of the buyer.

APPLICATION TO TREES AND ORNAMENTALS

IMA-jet is a systemic insecticide used to control a variety of insect pests of ornamental or forest trees. Pests controlled include aphids, whiteflies, soft scales, adelgids, gall forming wasps, leafhoppers, lace bugs, mealybugs, psyllids, serpentine leafminers, sawflies, thrips and leaf feeding beetles. Use IMA-jet as directed in trees in residential, business and commercial areas, golf courses, airports, cemeteries, parks, street trees, playgrounds, athletic fields, commercial forestry production, seed orchard trees, nurseries, and in private, municipal, state, federal, county and local recreational forests.

When to Treat

For optimum results, apply IMA-jet prior to infestation. Also apply when insects are infesting and feeding upon the tree. IMA-jet insecticide moves upward into the tree's canopy from the application sites. Systemic activity occurs only after the active ingredient is translocated upward in the tree. This product must be applied below the bark into the sapwood (i.e., the vascular) tissues. In the case of severe infestation, use the highest label rate for the targeted pest. In trees larger than 24" use the highest rate listed for that insect pest. Dosages are designed for insect control and retreatment is generally not necessary during the year after initial treatment. Monitor insect activity to establish a damage threshold for retreatment. Repeat applications as necessary.

The need for an application can be based on historical monitoring of the site, previous records of experiences, current season adult trapping and other methods. Due to potential foliar injury or poor (i.e., slow) uptake, do not apply to trees stressed by drought or extreme heat.

Basic Injection Procedure

For insect control, this product must be placed into the tree's sapwood, the conductive tissue that moves water to the canopy. Make applications around the base of the tree. Inject into tree roots exposing them by careful excavation or, alternatively into the trunk flare or tissue immediately above the trunk flare, locating the injection site in the first few xylem (i.e., sapwood) elements. Drill holes through the bark and into the sapwood a minimum of 3/8" deep. When using the Arborjet Arborplug, drill a minimum of 5/8" deep into the sapwood.

Calculating Application Rate

The dosages and number of application sites are based on tree diameter.

To determine the application/dose rate per tree:

- 1) Measure the tree diameter in inches at chest height (54" from ground) to find the Diameter at Breast Height (DBH). (If measuring tree circumference, divide circumference by 3 to obtain the DBH in inches.)
- 2) Calculate the number of injection sites by dividing the DBH in inches by 2.
- 3) Multiply the tree DBH by the dosage rate (see table below for appropriate dosage rate) to calculate the total dose in milliliters per tree.
- 4) Divide the total dose by the number of injection sites to determine required dosage per injection site.

Example: For a tree with a DBH of 12 inches (or circumference of 36 inches) and 8 mL dosage rate:

- 1) DBH = 12" (circumference 36" ÷ 3 = 12")
- 2) Divide DBH of 12" by 2 = 6 injection sites.
- 3) Multiply DBH of 12 by 8 mL = 96 mL total dose per tree.
- 4) Divide 96 mL by 6 injection sites = 16 mL per injection site to deliver the required dosage.

To apply the highest dosage rate to trees as specified in the table, "Applications for Use in Listed Trees and Ornamentals and Forest and Woodlands Areas," it may be necessary to increase the number of injection sites applied. In the example given in "Calculating Application Rate", if the total dose per tree applied is less than the calculated 96 mLs, the remaining dosage should be placed into a new injection site. Do not place injection sites closer than 2" apart. Treat Cycads (i.e., gymnosperms) using this method of application. In resinous conifers (such as pine and spruce), start the injection immediately after drilling. A prolonged delay may reduce uptake on account of resin flow. In palms (i.e., monocots), only one injection site is required: locate the application site 1-3' from the soil level and drill 4" deep into the stem.

Application Equipment

IMA-jet is designed for use with the Arborjet Tree Injection Systems or with other tree injection devices that meet the label requirements and are chemically resistant. For all injection systems, read carefully and follow manufacturer's directions for use.

Use of IMA-jet

Use as formulated. Do not mix with water.

Compatibility

Test the physical compatibility of IMA-jet before use with other products.

NOTE: Before applying any tank mixture not specifically on this label, it is best to test the safety to the target tree. Do NOT apply liquid flowables, suspension concentrates, or dispersible granules that do not completely dissolve.

Restrictions

This product is not to be used on trees that will produce food within the year following treatment.

Do not use on syrup-producing sugar maples where sap is harvested.

Applications for Use in Listed Trees and Ornamentals and Forest and Woodland Areas		
For bee-pollinated trees, make applications post bloom		
For trees less than 12" in diameter, use the lower rate for the targeted pest. If trees are severely infested, use the highest label rate specified for control of the targeted pest. For trees larger than 24" diameter, always use the highest label rate for the targeted pest.		
Crop	Pest	Dosage
Trees & Ornamentals: Trees Shrubs Evergreens Interior Plantscapes Palms Forest areas: Non-urban Forests, Tree Plantations, Planted Christmas Trees, Parks, Rural Shelter Belts, Rangeland Trees and Woodland Trees including Conifers	Adelgids (including Hemlock Woolly Adelgid*) Aphids Gall Wasps (including Erythrina Gall Wasp) Lacebugs Leafhoppers Leaf miners Mealybugs Psyllids Soft scales Thrips Whiteflies	2.0 – 4.0 mL IMA-jet Systemic Insecticide per inch of cumulative trunk diameter at breast height (54" from the ground). Space injection holes approximately 6" apart, around the circumference of the tree.
Trees & Ornamentals: Trees Shrubs Evergreens Interior Plantscapes Palms Forest areas: Non-urban Forests, Trees Plantations, Planted Christmas Trees, Parks, Rural Shelter Belts, Rangeland Trees and Woodland Trees including Conifers	Adelgids (including Hemlock Woolly Adelgid*) Gall Wasps (including Erythrina Gall Wasp) Flatheaded Borers (including Bronze birch borer, Emerald ash borer) adults Japanese Beetles (adults) Leaf Beetles (including elm leaf beetle) Leaf bugs (including leaf footed seed bugs) Leaf miners Pine tip moth larvae Roundheaded Borers (including Eucalyptus longhorned borer) Royal palm bug Sawfly larvae Soft scales Thrips Whiteflies	4.0 – 8.0 mL IMA-jet Systemic Insecticide per inch of cumulative trunk diameter at breast height (54" from the ground). Space injection holes approximately 6" apart, around the circumference of the tree.

*IMA-jet provides 1-2 years of residual control of Hemlock Woolly Adelgid. Trees infested with Hemlock Woolly Adelgid might require two applications before significant control is seen.

For use under USDA Supervision Only			
Host Trees	Pest	DBH Range	Dose Rate mL/DBH"
Elm, Maple, Birch, Willow, Box elder, Horsechestnut, Buckeye, European Mountain Ash, Ash, Poplar, Albizia, London Plane, Hackberry and Sycamore	Asian Longhorned Beetle	2 - 23"	4.0 mL
		24" +	8.0 mL

ARBORJET MICRO-INFUSION™ PROCEDURES

Basic Arborjet Micro-Infusion™ Procedures:

1. Determine the dosage based on target pest and tree diameter.
2. Pour concentrate into the medicament bottle and cap.
3. For Tree I.V.: pressurize the contents from 25 to 60 PSI and prime the lines by opening each injector valve slowly to purge the air; close the valve when liquid begins to flow, or For Hydraulic Device: pressurize the contents to 15 PSI and prime the lines by depressing the trigger and pulling back slowly on the dose-sizer.
4. Determine the number and placement of injection sites around the base of the tree. Drill through the bark then 5/8" into the sapwood using the appropriate sized drill bit. For best results, use clean and sharp Brad point drill bits.
5. Insert the Arborplug™ using the set tool and mallet. Use the #4 Arborplug (3/8" d) for most applications, including conifers. In hardwoods, you may also use smaller diameter Arborplugs including the #3 (9/32" d). Insert the VIPER needle into the Arborplug. To start the Tree I.V. infusion, open the needle valve. Close the valve and remove the VIPER needle upon completion of infusion. To inject with the Hydraulic Device, depress the trigger to apply the dose.

Alternative Arborjet STINGER Procedure:

6. Alternatively, insert the #2 (7/32" drill bit) STINGER injector tip 5/8" deep into the sapwood in the predrilled hole with a hand push or by gently tapping the injector tip into the sapwood with a mallet. Remove STINGERS upon completion of infusion process by pulling and twisting out counter-clockwise. Use a cleaner or an EPA registered disinfectant between trees when using the reusable STINGER tips.

INJECTION PROCEDURES for M3 INJECTOR

Use root flare injections—IMA-jet Infusible Insecticide can be used with a variety of refillable tree infusion devices. For all injection devices, read carefully and follow all manufacturer use directions.

Installation and Application using the Rainbow Treecare Scientific Advancement M3 injector:

1. Examine the tree for the presence of root flare. If flares are not visible, excavate the root collar. Make Infusion sites 5-10 inches below the top of the root flare.
2. Thoroughly brush all dirt from the tree. A dirty root flare will dull the drill bit and increase uptake time.
3. Lay the injectors around the tree to select injection sites. The application rate is 1 injection site for every 2 diameter inches (approximately 1 injection site every 6 inches) evenly spaced around the root-flares. Using a 11/64" or 3/16" (4.5 to 5 cm) HIGH HELIX drill bit, drill a hole at a downward angle into each selected buttress root flare above the soil line. Drill to a depth of 1 to 1.5 cm (3/8 to 1/2") into healthy xylem tissue.
4. Insert the injector tip into the hole and seat firmly with hand pressure.
5. Close the control valve.
6. Inject treatment liquid into the M3 injector reservoir through the black duckbill (filling) valve.
7. Inject air into the M3 injector reservoir through the filling valve. Do not inject more than 25 cc of air.
Note: Care must be taken when pressurizing the capsule. If the tool used to pressurize the capsule passes all of the way through the duckbill, the duckbill will not close and the capsule will not be pressurized.
8. Open the control valve just to the point where the liquid starts to flow into the tree.
9. Check for leaks. If leaks are found close the valve, seat firmly into the tree and re-open the valve. If leaks persist the problem may be too shallow of a hole, close the valve, remove the injector and re-drill to a deeper depth.
10. Uptake usually occurs within minutes. When all of the treatment liquid is out of the injector, a wash solution of water can be injected into the M3 injector and it can be re-pressurized or the M3 injector can be closed and removed from the tree. Wash solutions are not compatible with all formulations. Check for compatibility prior to rinsing the M3 injector into the tree.
11. Remove the M3 injector from the tree and store properly for reuse.

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store bottles in a cool, dry place above 45° F. Store in original container out of reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or puncture and dispose of empty bottle in a sanitary landfill.

NOTICE OF WARRANTY

ARBORJET, Inc. makes no warranty of fitness of this product for any other purpose, beyond its uses under normal conditions in keeping with the statements made on this label.