



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 18, 2021

David Anderson
Director of Regulatory Affairs
Rainbow Treecare Scientific Advancements
11571 K-Tel Drive
Minnetonka, MN 55343

Subject: Label Amendment – Addition of new ornamental trees, specification of rate usage on each ornamental tree species and revising optional marketing language and directions of use for clarification.
Product Name: Cambistat ROW
EPA Registration Number: 74779-19
Application Date: April 30, 2020
Decision Number: 566200

Dear David Anderson:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact James Orrock via email at orrock.james@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kable Bo Davis', enclosed within a hand-drawn oval.

Kable Bo Davis
Senior Regulatory Specialist
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Cambistat™ ROW [ABN: ClearROW]

For Use Only on Utility Rights-of-Way

Active Ingredient:

Paclobutrazol (R*, R*)-(±)-β-[(4-chlorophenyl)Methyl]-α-(1,1-dimethylethyl)-1H-1,2,4-triazole-1-ethanol	22.3
Other Ingredients:.....	<u>77.7</u>
Total	100.0%

Contains 2 lbs. active ingredient per gallon

KEEP OUT OF REACH OF CHILDREN
CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See Side/Back Panel for Additional Precautionary Statements, First Aid and Directions for Use

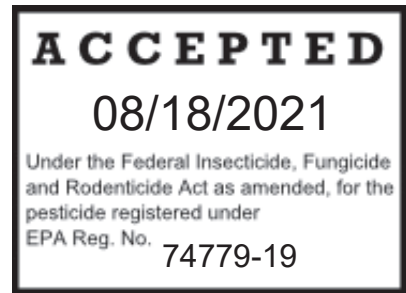
EPA Reg. No. 74779-19

EPA Est. No. 39578-TX-1

Net Contents:

1 gallon (3.78 L)	2.5 gallons (9.5 L)
5 gallons (18.9 L)	55 gallons (208.2 L)

Rainbow Treecare Scientific Advancements
11571 K-Tel Drive
Minnetonka, MN 55343
1-877-ARBORIST
1-877-272-6747
www.treecarescience.com



FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call a 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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or 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 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.	

HOT LINE NUMBER

For 24 hour medical emergency assistance (human or animal), or chemical emergency assistance (spill, leak or accident). Call CHEMTREC at 1-800-424-9300

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if swallowed, inhaled or absorbed through the skin. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long sleeved shirt, long pants, socks, shoes and gloves. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of barrier laminate; butyl rubber \geq 14 mls; neoprene rubber \geq 14 mls, nitrile rubber \geq 14 mls; polyvinyl chloride (PVC) \geq 14 mls; or Viton \geq 14 mls
- Shoes plus socks

Applicators and other handlers are also recommended to wear protective eyewear.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, 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.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly 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 cleaning equipment or disposing of equipment wash water.

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.

FAILURE TO FOLLOW THE USE DIRECTIONS AND PRECAUTIONS ON THIS LABEL MAY RESULT IN PLANT INJURY OR LESS THAN OPTIMAL GROWTH REDUCTION.

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.

Product Information

Cambistat ROW is a plant growth regulator that slows the vegetative growth of plants by inhibiting gibberellin biosynthesis. Cambistat ROW is designed to slow the growth of trees. A single application provides a long lasting reduction of vegetative growth, effectively extending the trimming cycle of trees and reducing the amount of woody growth that must be removed. In addition, use of Cambistat ROW may cause other plant growth effects that are beneficial for trees such as increased root density, improved drought and heat resistance, and tolerance to insects and diseases. Cambistat ROW will also benefit trees that are too large for their growing site and increase the longevity of trees growing in stressful environments.

Indications of Tree Response:

Cambistat ROW is readily absorbed by plant roots and is translocated to the actively growing points. Initially, an intense greening of the foliage may occur in response to treatment. Long-term effects include: shortened internodes and smaller, thicker leaves. Visible results may be seen in as little as 2 months but measurable growth reduction may take as long as a year to occur.

Use Precautions

- Trees not specified on this label that do not bear fruit or nuts may be treated if all other directions are followed.
- The degree and duration of Cambistat ROW applications can be affected by local soil and environmental conditions. Carefully read and follow label instructions to ensure effectiveness.
- Heavily compacted soils around trees may need to be vertical mulched, aerated or receive other remedial soil compaction treatments for Cambistat ROW to effectively promote root growth.
- Shrubs and/or herbaceous ornamentals next to treated trees may be affected if their roots extend into the treatment zone.

Use Restrictions

- Apply only to trees in utility rights-of-way.
- Do not treat sugar maple trees or any other trees that will be tapped for sugar.
- Do not treat fruit or nut trees that will be harvested within one year.
- Do not treat severely stressed trees or trees in rapid decline.
- Do not apply through any irrigation system.
- Wait at least 3 years before re-treating.
- Do not apply Cambistat ROW to turf within rights-of-way.

DOSING

Use the following steps to determine the required dose:

- 1) Correctly identify the tree species.
- 2) Measure tree diameter at breast height (DBH). (See determining DBH)
- 3) Locate the correct dosage rate category for your species (See table 3).
- 4) Locate the amount of material to use based on the category and DBH of your species (See table 2).
- 5) Determine if any rate reductions are necessary (See Dosage Reduction Considerations).

DETERMINING DBH

Single Stem: Measure the standard DBH of the tree at 4' 6" above the soil.

Multiple Individual Trees Growing in Close Proximity: For trees that have grown close together, measure the DBH of each stem and treat each tree individually. You may need to make rate reductions due to the overlapping canopies (See Dosage Reduction Considerations). Also, because of close proximity of trees, it may be necessary to apply to outer perimeter of clumped trees.

Multi-stem Split Below DBH: For a tree that has multiple stems splitting below DBH, measure the tree at the narrowest point between the root flare and the split.

Stem Clusters: For trees that are grown too close together to be treated as individual trees, measure the DBH of each stem and add the measurements together. You may need to make rate reductions due to overlapping canopies (see Dosage Reduction Considerations). Also, because of close proximity of trees, it may be necessary to apply to outer perimeter of clumped trees.

Tree Splits at DBH: For a tree that splits into two or more stems at DBH, measure and add the diameter of the stems and measure the narrowest point below the split. Take the average of these values.

DOSAGE REDUCTION CONSIDERATIONS

Canopy Missing: Look at the canopy of the tree and compare it to a “normal” canopy for that trunk diameter. For example, if a tree is missing large branches from storm damage or utility line clearance pruning it is necessary to estimate the percentage of canopy missing and subtract this percentage from the dosage amount. i.e. subtract 30% from dosage if 30% is missing from the canopy.

Canopy Suppression: Trees growing in close proximity to other trees, multi-stemmed trees, and trees growing in clusters may have overlapping canopies. Your judgment is required to compare the canopies of these trees to the “normal” canopy for trees with similar trunk diameter. It may be necessary to reduce the dosage amount based on the percent of suppression and canopy overlap.

Stressed or Declining Trees: Dosage rates for trees that have lost canopy from construction damage, storm damage, insects, disease, girdling roots and/or other types of stress must be reduced to minimize the risk of over-regulation. A full dose of Cambistat ROW applied to a tree with small, thin, or declining canopy may result in smaller leaves and a sparse canopy.

- Reduce the dosage rate on highly stressed trees by 25% or more
- Trees that show significant stress and are in rapid decline are NOT good candidates for treatment.
- For stressed trees, consider that additional canopy may decline before treatment response begins so you may need to reduce the dose by more than what is presently missing.

Trees with Confined or Compromised Root Systems: Trees in sidewalk boxes, above ground planters, and new transplants may absorb Cambistat ROW from the treatment area in a higher proportion than a tree with a full root system. Reduce the dosage rate by 25% or more.

MIXING PROCEDURE

Dilute 1 part Cambistat ROW with 11 parts water. For example, combine 1 quart of Cambistat ROW with 11 quarts of water to make 3 gallons of dilute solution. See table 1 for additional examples. When mixing large amounts, mix only the amount that will be used within that day. Cambistat ROW is best applied with equipment that has constant agitation.

Table 1. Examples of the volumes of Cambistat ROW and Water needed to make diluted solution.

Volume of Cambistat ROW	Volume of Water	Makes
1 qt	11 quarts	3 gallons
1 gallon	11 gallons	12 gallons
4 gallons	44 gallons	48 gallons

If applying mixture to compacted soils, high clay content soils, or other hard-to-wet soils, use a nonionic, organosilicone wetting agent (surfactant) to increase penetration of the soil. Mix approximately ½ ounce surfactant per 3 gallons or 1 pint surfactant per 100 gallons. Follow all label directions and precautions on the surfactant product label.

APPLICATION METHOD

Soil Injection

Inject the Ready to Use solution approximately 3 – 4 inches deep using the HTI soil injector or similar soil injection device. Dosages are based on tree diameter and species (See tables below). Orient injection orifices to release the diluted product horizontally at the point of injection. Divide the required dose evenly among injection sites spaced as uniformly as possible around the base of the tree.

As an example, if using the HTI soil injector, the standard injection volume per site is 250 mls. You will divide the total dose a tree requires by 250 mls to determine the number of injection sites. If the number of injection sites is a fraction, for example, you have a 12 inch tree in the B category. The total dose for the tree is 1200 ml of diluted solution. Dividing 1200 ml by 250 mls/injection site = 4.8 injection sites. In this case, you will inject 4 locations with 250 mls each and a 5th injection sites with 200 mls. This will deliver the total

Position the injection sites to release the diluted solution as close as possible to the point of contact between the soil and the tree beneath the soil so that the solution is readily absorbed by the tree (Figure 1). Locate injection sites next to buttress roots (Figure 1). For trees less than 6 inches DBH, use at least 4 injection sites evenly spaced around the tree.

APPLICATION TIMING

For a more manicured look, apply to trees 30 to 180 days before they are pruned. To allow some regrowth and a more natural look, apply at the time of pruning.

Soil applications can be made throughout the year, except when the soil is frozen or saturated with water. Note: When applied to the soil, product is absorbed by tree roots and translocated to the growing points (sub-apical meristems) in response to evaporative water loss (transpiration). If applications are made after leaf drop, uptake will not occur until development of new leaves and resumption of transpiration.

Application rates for typical tree species.

Table 2: Standard Dilute Solution Rates. Make dilute solution by combining 11 parts of water with 1 part of Cambistat ROW.

Category	ml per DBH inch
A	75
B	100
C	125
D	138
E	150
F	200
G	300
H	400

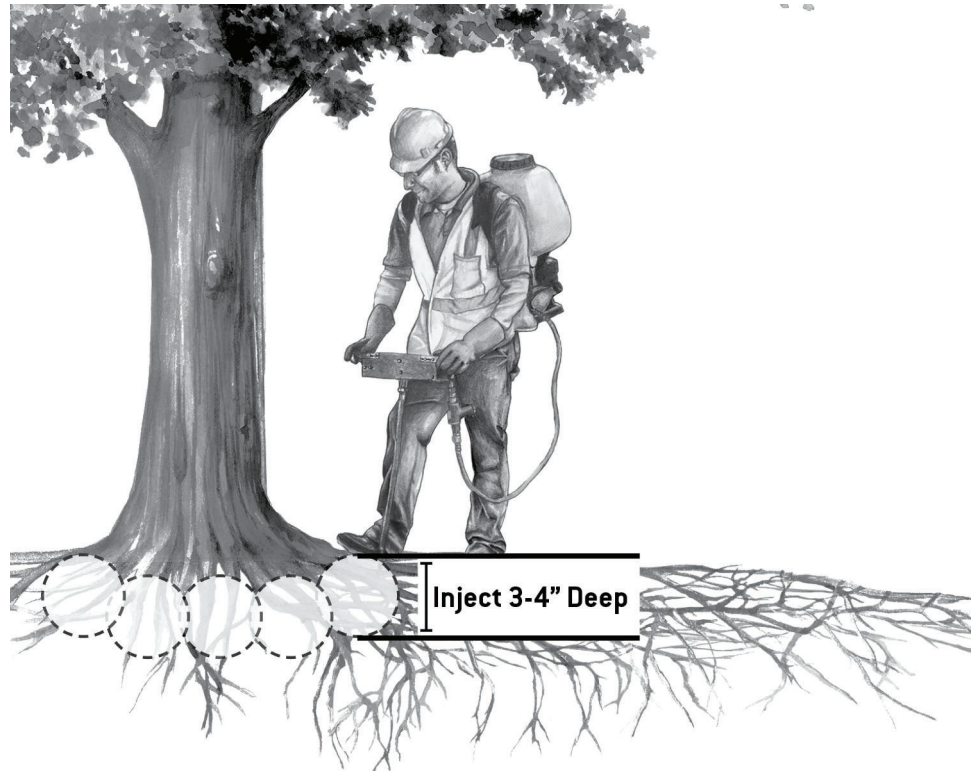
Table 3: Tree reference list and dosage rates

Species	Category	Species	Category	Species	Category
Acacia	F	Hawthorn	D - F	Oleander	C - F
Ailanthus	D - F	Hemlock	F	Olive - Black	F
Alder	F	Hickory	E - F	Olive - European	E - F
Anaqua	E - F	Holly - American	E - F	Olive - Russian	E - F
Arborvitae	F	Holly - Nellie Stevens	E - F	Orchid Tree - Hong Kong	C - F
Ash	G - H	Holly - Yaupon	B - E		
Aspen	F - H	Hong Kong Orchid Tree	C - F	Osage Orange	F
Australian Bottle	C - F	Horse chestnut	C - F	Palm	F - H
Australian Pine	B - E	Huisache	E - F	Paloverde	E - F
Bald Cypress	F	Ironwood / Hornbeam	D - F	Paulownia	E - F
Banyan - Ficus	F	Jacaranda	F	Pear - Ornamental	H
Basswood - American	A - D	Juniper	F	Pecan	E - F
Baytree	E - F	Katsura - Japanese	B - E	Persimmon	C - F
Beech	E - F	Larch	F	Photinia	E - F
Birch	F	Laurel	F	Pine	H
Bischofia	F	Ligustrum	G	Plum - Ornamental	E - F
Black Gum / Tupelo	C - F	Lilac - Japanese	E - F	Poinciana	F
Bottlebrush	F	Linden	A - D	Poplar	H
Boxelder	B - E	Locust - Black	F	Raintree - Golden	E - F
Buckeye	D - F	Locust - Honey	E - F	Redbud	A
Buttonwood	F	Lysiloma	F	Redcedar - Eastern	F
California Pepper	C - F	Magnolia	F	Redwood	G - H
Camphor	E - F	Mahogany	F	Rosewood / Tipuana	C - F
Catalpa	G - H	Maple - Amur	B - E	Saltcedar	H
Cedar - Deodora	E - F	Maple - Bigleaf	E - F	Sassafrass	E - F
Cedar - all others	F	Maple - Japanese	A	Sea Grape	E - F
Cherry - Black	F	Maple - Norway	B - F	Silk Oak	C - F
Cherry - Laurel	E - F	Maple - Red	B - F	Soapberry	E - F
Cherry - all others	E - F	Maple - Silver	C - F	Spruce	H
Chinaberry	E - G	Maple - Sugar	B - F	Sugarberry/Southern Hackberry	F - G
Chinese Pistache	E - F	Melaleuca	F		
Cottonwood	H	Mesquite	E - F	Sumac - African	E - F
Crabapple	F	Mimosa	E - F	Sweetgum	A - E
Crape Myrtle	C - F	Mountain Ash	B - E	Sycamore	F - H
Cryptomeria	F	Mulberry	H	Tabebuia	F
Cypress - Leyland	F	Oak - Black	E - F	Tallow - Chinese	D - F
Cypress - all others	B - E	Oak - Blackjack	E - F	Tamarisk	F
Ebony - Texas	F	Oak - Bur	D - F	Tepeguaje	E - F
Elm - Cedar	B - E	Oak - Laurel	E - F	Tulip / Yellow Poplar	F - G
Elm - Chinese/Lacebark	A - D	Oak - Live	C - F	Walnut	E - H
Elm - Siberian	B - E	Oak - Pin	E - F	Waxmyrtle - Pacific	F
Elm - all others	B - E	Oak - Post	D - F	Willow	G
Eucalyptus	H	Oak - Red	E - F	Xylosma	C - F
Ficus	H	Oak - Sand Shinnery	D - F	Yew	F
Fir	H	Oak - Scarlet	E - F	Zelkova	B - E
Ginkgo	F	Oak - Shumard	E - F		
Gumbo Limbo	F	Oak - Valley	F - H		
Hackberry	F - G	Oak - Water	E - F		
		Oak - White	D - F		
		Oak - Willow	E - F		

Call 877-ARBORIS(T) (877-272-6747) for questions.

The use of a rate within the rate range is based on the professional judgment of the applicator as to what rate is required to achieve regulation of a specific tree. Higher rates tend to provide better control of large trees and more difficult to control species.

Figure 1. Soil injection of Cambistat ROW



STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

Pesticide Storage: Keep container closed when not in use. Do not store near food or feed. Protect from freezing. In case of spill or leak on floor or paved surfaces, soak up with sand, earth, or synthetic absorbent. Remove to chemical waste area.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these cannot be disposed of by use according to label instructions, contact your state pesticide or environmental control agency, or the hazardous waste representative at the nearest EPA regional office for guidance.

Container Handling:

Non-refillable container: Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Offer for recycling, if available or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

(non-refillable <5 gallons) Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

(non-refillable >5 gallons): Triple rinse as follows: Empty the remaining contents into application equipment or mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application

equipment or mix tank or collect rinsate for later use for disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Notice: Read the entire Directions For Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

Follow the Directions For Use carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Tree injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or tree conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of RAINBOW TREECARE SCIENTIFIC ADVANCEMENTS or seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold RAINBOW TREECARE SCIENTIFIC ADVANCEMENTS and Seller harmless for any claims relating to such factors.

RAINBOW TREECARE SCIENTIFIC ADVANCEMENTS warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions For Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or RAINBOW TREECARE SCIENTIFIC ADVANCEMENTS, and Buyer and User assume the risk of any such use. RAINBOW TREECARE MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, RAINBOW TREECARE SCIENTIFIC ADVANCEMENTS or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF RAINBOW TREECARE SCIENTIFIC ADVANCEMENTS AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF RAINBOW TREECARE OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

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OPTIONAL MARKETING CLAIMS

Arborceutical solutions

Committed to advancing the science of tree care

Reduce line clearance costs

Improved customer satisfaction through reduced trimming and healthier trees

Up to 40 to 90% reduction in regrowth [for 3 years]

Enhances tree roots by promoting fine root density

Promotes fine root density

Improves drought resistance

Extends trim cycle time

Extends trim cycle

Ideal for use on fast-growing trees to reduce growth

Reduces growth of trim cycle-buster trees

Reduces hot-spotting costs

Reduces line interference outages and increases reliability.

Ideal for application on difficult to access trees

Helps trees [by increasing fine root density] [by reducing drought stress] [by slowing trunk and shoot growth of trees in confined areas]

One application lasts up to 3 years

Ideal for use on critical [utility] feeder lines.

Ideal for zone management

Protects investment in boulevard and parking lot trees

Can increase tree longevity in stressful environments

Specially formulated for soil application around trees.



Tree Growth Regulator

[Plant] Growth regulator for trees

Growth Control Uses for Cambistat ROW

- Short Right of Way Clearances
- Difficult to access trees – backyards within Right of Ways
- Zone 1 trees – immediately out of the substation
- Cycle busters – problem trees
- Critical feeder lines – hospitals, industry
- Complete circuits
- Complete System
- Concerned / difficult customers with right-of-way trees