

83220-2

05/26/2011

1/4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

emailed 5/26/11

Ms. Kim Davis
Consultant/Agent for EZ-Ject, Inc.
c/o RegWest Company, LLC
8203 West 20th St., Suite A
Greeley, CO 80634-4696

MAY 26 2011

Ms. Davis:

RE: ADMINISTRATIVE LETTER DATED OCTOBER 25, 2010; CONSULTANT/AGENT FOR EZ-JECT, INC; AMENDED LABEL FOR IMAZAPYR-EZ-JECT, EPA REG. NO. 83220-2 (A.I. – ISOPROPYLAMINE SALT OF IMAZAPYR)

The product chemistry and acute toxicity studies are being reviewed in Pesticide Re-evaluation Division, and are not part of this amended label review.

The amended label submitted with a date of 10/25/2010 is approved, and a stamped Accepted label is enclosed for your files. There may be additional changes as part of the re-registration of this product once all product chemistry and acute toxicity studies are reviewed and accepted, and a re-registration label review is completed.

Please contact Phil Errico at 703-305-6663/ errico.philip@epa.gov for any additional assistance in this matter.

Kind Regards,

A handwritten signature in black ink, appearing to read "Kable Bo Davis".

Kable Bo Davis PM 25
Herbicide Branch/Registration Division 7505P

Imazapyr - EZ-Ject™

Water-Soluble Herbicide in Shells for Stem Injection
Controls Undesirable Woody Brush, Trees and Vines – Roots and All – on Forestry Sites,
Roadsides, Rights-of-Way, Industrial Sites, Fencerows, Railroads, Standing Water and Wetlands

Active Ingredient:

Isopropylamine salt of Imazapyr (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-
5-oxo-1H-imidazol-2-yl]-3-pyridinecarboxylic acid)* 83.5%

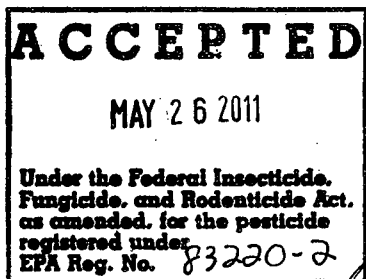
Other Ingredients 16.5%

Total 100.0%

* Equivalent to 0.008 ounces (0.23 grams) per shell of Isopropylamine salt of Imazapyr or 0.006 ounces (0.18 grams) of Imazapyr Acid.

**Keep Out of Reach of Children
CAUTION**

See below for additional Precautionary Statements



Net Contents: 1200 Shells
Shell Net Weight: 0.03 ounce (0.95 g)
Total Net Weight: 2.25 lbs. (1 kg)

EPA Reg. No. 83220-2 • EPA Est. 69117-NE-1

Sold by
EZ-Ject™, Inc.

P.O. Box 34645 • Omaha, NE 68134
Toll Free: 1-888-395-6732

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Causes eye irritation. Avoid contact with eyes, skin or clothing.

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 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 treatment advice.
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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

Personal Protective Equipment (PPE)

Applicators and other handlers must wear long-sleeved shirt and long pants, shoes plus socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables are given, 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 immediately if pesticide gets inside, then thoroughly wash and put on clean clothing.

Environmental Hazards

For terrestrial uses, do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

Woody vegetation may be controlled by injection of EZ-Ject™ selective injection herbicide shells. This product is recommended for woody brush, tree and vine control on the following sites: forestry, roadsides, rights-of-way, industrial, residential, fencerows, railroads and standing water and wetlands. For trees and brush in standing water or wetlands this product may be injected only into stems above the water level. Do not apply directly to water or inject into stems below the water level.

This product moves throughout the tree from the point of injection to all roots and shoots. Symptoms appear gradually (normally within 2 to 4 weeks) beginning with wilting, yellowing and browning of the foliage. This is followed by deterioration of all roots and shoots.

Inject the shells using only the EZ-Ject™ shell injection equipment. The shells must penetrate through the outer bark into living xylem/phloem tissue to provide effective results. For trees with less than 2.5 inches of trunk diameter measured at the base of the plant, inject one shell per stem below all major branches. For trees greater than 2.5 inches of trunk diameter, measured at the base of the plant, inject one shell every 2-4 inches of trunk circumference, evenly spaced around the trunk of the tree, below all major branches. Tree may be injected at any time of the year except when wood is frozen. For woody brush with a minimum of 3/4" diameter, inject one shell at the base of the plant.

Note: Injury may occur to non-target or woody plants if they extend from the same root system, or their root systems are grafted to those of the treated tree.

The species of woody brush, trees and vines controlled by this product include:

Woody Brush and Trees

- | | |
|---|--|
| Alder (<i>Alnus</i> spp.) | Madrone (<i>Arbutus menziesii</i>) |
| American beech (<i>Fagus grandifolia</i>) | Maple (<i>Acer</i> spp.) |
| Ash (<i>Fraxinus</i> spp.) | Melaleuca (<i>Melaleuca quinquenervia</i>) |
| Aspen (<i>Populus</i> spp.) | Mulberry (<i>Morus</i> spp.) |
| Autumn olive (<i>Elaeagnus umbellata</i>) | Oak (<i>Quercus</i> spp.) |
| Bald cypress (<i>Taxodium distichum</i>) | Persimmon (<i>Diospyros virginiana</i>) |
| Bigleaf maple (<i>Acer macrophyllum</i>) | Poison oak (<i>Rhus diversiloba</i>) |
| Birch (<i>Betula</i> spp.) | Popcorn-tree (<i>Sapium sebiferum</i>) |
| Black oak (<i>Quercus kelloggii</i>) | Poplar (<i>Populus</i> spp.) |
| Blackgum (<i>Nyssa sylvatica</i>) | Privet (<i>Ligustrum vulgare</i>) |
| Boxelder (<i>Acer negundo</i>) | Red alder (<i>Alnus rubra</i>) |

Brazilian peppertree (*Schinus terebinthifolius*)
 Ceanothis (*Ceanothis* spp.)
 Cherry (*Prunus* spp.)
 Chinaberry (*Melia azedarach*)
 Chinese tallow-tree (*Sapium sebiferum*)
 Chinquapin (*Castanopsis chrysophylla*)
 Cottonwood (*Populus trichocarpa* and *P. deltoids*)
 Cypress (*Taxodium* spp.)
 Dogwood (*Cornus* spp.)
 Eucalyptus (*Eucalyptus* spp.)
 Hawthorn (*Crataegus* spp.)
 Hickory (*Carya* spp.)
 Huckleberry (*Gaylussacia* spp.)
Lyonia spp. including:
 Fetterbrush (*Lyonia lucida*)
 Staggerbrush (*Lyonia mariana*)

Red maple (*Acer rubrum*)
 Saltcedar (*Tamarix pentandra*)
 Sassafras (*Sassafras albidum*)
 Sourwood (*Oxydendrum arboretum*)
 Sumac (*Rhus* spp.)
 Sweetgum (*Liquidambar styraciflua*)
 Sycamore (*Platanus occidentalis*)
 Tanoak (*Lithocarpus densiflorus*)
 TITI (*Crylla racemiflora*) [suppression]
 Tree of heaven (*Ailanthus altissima*)
Vaccinium spp. including:
 Blueberry (*Vaccinium* spp.)
 Sparkleberry (*Vaccinium arboretum*)
 Willow (*Salix* spp.)
 Yellow poplar (*Linodendron tulipifera*)

Honeysuckle (*Lonicera* spp.)
 Redvine (*Brunnichia cirrhosa*)
 Virginia creeper (*Parthenocissus quinquefolia*)
 Wild buckwheat (*Polygonum convolvulus*)

Vines

Wild grape (*Vitis* spp.)
 Wild rose (*Rosa* spp. including:
 Multiflora rose (*Rosa multiflora*)
 Macartney rose (*Rosa bracteata*)

Storage and Disposal

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

Pesticide Storage: Keep container closed to prevent spills and contamination. At the end of each use period, remove unused casings from the EZ-Ject™ injection system. Replace unused casings in original container and re-seal. Always store the product with the open end of the capsule facing UP. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site by using according to "Directions for Use" on this label, or at an approved waste disposal facility.

Container Disposal: Non-refillable container; do not reuse or refill container. Offer for recycling if available; alternatively, dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

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

For additional product information call 1-888-395-6732

Notice of Warranty

EZ-Ject™, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for use under average conditions when used in accordance with the directions on the labeling. EZ-Ject™, Inc. does not make or authorize any agent or representative to make any other warranty, guarantee or representation, expressed or implied, concerning this product.

EZ-Ject™ is a trademark of EZ-Ject, Inc.