

86044-2

02-17-2011

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U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:
86044-2

Date of Issuance:
FEB 17 2011

NOTICE OF PESTICIDE:

Registration
 Reregistration

(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

ROOTPLUG

Name and Address of Registrant (include ZIP Code):

PLUGGAB Inc.
c/o Amy Roberts
Technology Sciences Group Inc.
1150 18th Street, N.W.
Washington, D.C. 20036

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for registration review of your product under FIRA section 3(g).
2. Make the following label changes before you release the product for shipment:
 - a. Revise the EPA Registration Number to read, "EPA Reg. No. 86044-2".
 - b. Add the batch number to product label in disposable containers before shipment.
 - c. Add the EPA Establishment Number to product label before shipment.

Signature of Approving Official:

Date:

FEB 17 2011

Kable Bo Davis, Product Manager (25)
Herbicide Branch, Registration Division (7505P)

3. The alternate brand names, PLUGGED and SWEPLUG, are acceptable.
4. The data requirements for storage stability (830-6317) and corrosion characteristics (830-6320) have not been satisfied; and must be submitted within eighteen months of the date of this letter.
5. Submit one copy of the revised final printed label for the record before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact Phil Errico at (703) 305-6663 or errico.philip@epa.gov.

Kable Bo Davis
Product Manager (25)
Herbicide Branch
Registration Division (7505P)

Enclosure- Stamped Labeling

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ROOTPLUG

(Alternate Brand Names: "PLUGGED"; "SWEPLUG")

NOT FOR USE AT RESIDENTIAL, SCHOOL AND INSTITUTIONAL USE SITES.

This product can be used to kill trees and stumps in the non-food/non-feed sites: forests; parks; highway, utility, and railroad right-of-ways; and industrial and fence row sites. Can be used to kill the trees and stumps of Alder, Ash, Aspen, Beech, Birch, Cherry, Elm, Lime, Maple, Oak and Poplar.

Active Ingredient:

Glyphosate, in the form of its ammonium salt* 74.70%

Inert Ingredients: 25.30%

Total:..... 100.00%

*Equivalent to 67.9% of the acid glyphosate

KEEP OUT OF REACH OF CHILDREN DANGER/PELIGRO

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.)

FIRST AID	
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. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Have person sip a glass of water if able to swallow. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also call 314-694-4000 for emergency treatment information.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

SEE [BACK, SIDE, REAR] PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

Manufactured (for) (by):

PLUGGAB Inc.
511 Avenue of the Americas, Suite 316
New York, NY 10011

EPA Reg. No.: 86044-E

EPA Est. No.:

Batch Code:

Net Contents:

ACCEPTED
With COMMENTS
In EPA Letter Dated:

February 17, 2011

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

86044-2



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PRECAUTIONARY STATEMENTS

HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS: DANGER. Ingredients in ROOTPLUG cause eye burns. Harmful if swallowed. Do not get ingredients in eyes, on skin, or on clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE): Applicators and other handlers must wear:

- Coveralls worn over long-sleeved shirt and long pants.
- Chemical-resistant footwear plus socks.
- Chemical-resistant gloves.
- Protective eyewear such as goggles.

Discard clothing that becomes contaminated with the ingredients in ROOTPLUG. Do not reuse them. Follow manufacturer's instructions for cleaning / maintaining PPE. If there are 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 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: To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

DIRECTIONS FOR USE

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

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), and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

There is no re-entry interval (REI). Only protected applicators are allowed in area during treatment of sites.

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are **not** within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses.

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Keep all unprotected persons out of area during treatment of sites.

When used as directed, this product kills trees and stumps of Alder, Ash, Aspen, Beech, Birch, Cherry, Elm, Lime, Maple, Oak and Poplar. This product can be used for killing trees in areas where surface water is present or in intertidal areas. For effective results, ROOTPLUG must be applied such that the contents of the active ingredient is in direct contact with the tree's phloem tissue (the first living tissue under the bark).

Treatment of stumps

Drill a hole 1 1/8 inch deep from above the stump, or into the side of the stump, with a 1/2 inch drill bit. When drilling from above, drill as close to the bark as possible with each hole spaced 2 1/3 – 3 1/8 inches apart. Insert a ROOTPLUG into each hole and use a hard rubber hammer to drive it into the stump. For best results, treatment of stumps should occur no more than two days after tree has been felled.

Treatment of trees

For standing trees, drill holes at a depth of 1 1/8 inches using a 1/2 inch drill bit and insert one ROOTPLUG into each hole as indicated in the table.

Treatment of standing trees		
Species	Diameter of tree at breast height	Number of ROOTPLUGs
Alder, Aspen, Beech, Birch, Elm, Lime, Maple	2.5 inches	1
	4 inches	2
	5.5 inches	3
	7 inches	4
	8 inches and above	One every 3 inches
Ash, Cherry, Oak, Poplar	2.5 inches	2
	4 inches	4
	5.5 inches	6
	7 inches	8
	8 inches and above	One every 1½ inches
	Visible roots	One in each root

The contents of ROOTPLUG move throughout the tree from the point of injection to all roots and shoots. Effects appear gradually (normally within 2-4 weeks depending on moisture conditions and growth stage) beginning with wilting followed by yellowing and browning of the foliage, and finally with deterioration of all roots and shoots.

PRECAUTIONS AND RESTRICTIONS

- DO NOT OPEN OR SEPRATE THE ROOTPLUG UNITS.
- DO NOT USE ROOTPLUG ON RESIDENTIAL, SCHOOL OR INSTITUTIONAL SITES.
- DO NOT USE THE HARD RUBBER HAMMER IN SUCH A MANNER THAT WILL COMPROMISE THE INTEGRITY OF THE ROOTPLUG UNITS.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container in a cool dry and locked place inaccessible to children and pets. Keep container tightly closed when not in use. At the end of each use period, place unused plugs into the original container and reseal.

PESTICIDE DISPOSAL AND CONTAINER HANDLING:

If empty – Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available.

If partly filled – Wastes of this product may cause irreversible eye damage and may be dangerous. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes 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. Never place unused product down indoor or outdoor drain.

WARRANTY - PLUGGAB Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in the Complete Directions for Use label booklet ("Directions") when used in accordance with those Directions under the conditions described therein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE.

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OPTIONAL LABEL CLAIMS:

- A stump treatment method from PLUGGAB Inc. containing glyphosate formulation of ammonium salt granulate.
- ROOTPLUG can be used in any weather at any time of the year.

- ROOTPLUG is patented, 8701680-4