

74578-6

05/31/2012

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MAY 31 2012

Ms. Susan Stracquatano
Arborjet
c/o Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Subject: Alternate Brand Name Added

Dear Ms. Stracquatano

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated May 17, 2012 for:

EPA Registration 74578-6

IMA-Jet 10% Adding Alternate Name (IMA-Jet 10)

The Registration Division (RD) has conducted a review of this request of applicability under PRN 98-10 and finds that the label changes(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Dani Daniel".

Dani Daniel
Registration Division (7504P)
Insecticide/Rodenticide Branch



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number
NOTIF

Application for Pesticide - Section I

1. Company/Product Number **74578-6**

2. EPA Product Manager
Venus Eagle

3. Proposed Classification
 None Restricted

4. Company/Product (Name)
Arborjet / IMA-jet 10%

PM# **1**

5. Name and Address of Applicant (Include ZIP Code)
Arborjet
c/o Delta Analytical Corp.
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904 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

Amendment - Explain below
 Resubmission in response to Agency letter dated _____
 Notification - Explain below.

Final printed labels in response to Agency letter dated _____
 "Me Too" Application.
 Other - explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification under PR Notice 98-10 to add alternate brand name: IMA-jet 10

This notification is consistent with the provisions of pr notice 98-10 and epa regulations at 40 cfr 152.46 and 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
 Yes*
 No

Unit Packaging
 Yes
 No

Water Soluble Packaging
 Yes
 No

2. Type of Container
 Metal
 Plastic
 Glass
 Paper
 Other (Specify)

* Certification must be submitted.

If "Yes,"
Unit Package wgt. No. per container

If "Yes,"
Unit Package wgt. No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) of Retail Container
1.06 qt. (1 liter)

5. Location of Label Direction
 On Label
 On Labeling accompanying product

6. Manner In Which Label Is Affixed to Product
 Lithograph Other
 Paper glued
 Stenciled

Section - IV

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

Name
Susan Stracquatano

Title
Agent for Arborjet

Telephone No. (Include Area Code)
301-680-7971

Certification

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

2. Signature

3. Title
Agent for Arborjet

4. Typed Name
Susan Stracquatano

5. Date
May 17, 2012

6. Date Application Received
(Stamped)



May 17, 2012

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington, VA 22202

Attn: Venus Eagle, PM 1

Re: Notification to add an Alternate Brand Name per PR Notice 98-10, Section II A

Product: IMA-jet 10%
EPA Reg. No. 74578-6
Company: Arborjet

Dear Ms. Eagle:

On behalf of Arborjet, I am submitting a notification for the product, IMA-jet 10%, EPA Reg. No. 74578-6, to add the following Alternate Brand Name:

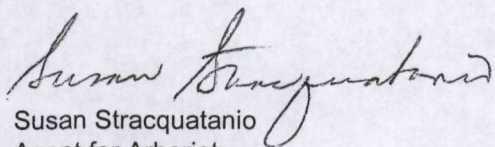
IMA-jet 10

The following documents are enclosed in support of this notification:

- EPA form 8570-1
- 1 copy of label (showing Alternate Brand Name)

If you have any questions regarding this submission, please contact me at ssstracquatano@delta-ac.com or (301) 680-7971.

Sincerely,


Susan Stracquatano
Agent for Arborjet

MAY 31 2012



IMA-jet 10% [Alternate Brand Name: IMA-jet 10]

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

Systemic Microinjection Insecticide for use with Arborjet Injection Systems and Other Specified Systems in the Management of Listed Insect Pests of Trees in Ornamental Landscapes, Forest and Woodland Areas & Interior Plantscapes

Active Ingredient:

Imidacloprid, 1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....	10.0%
Other Ingredients	90.0%
Total	100.0%

STOP—read the entire label before use.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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 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 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 a 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.
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
 99 Blueberry Hill Road
 Woburn, MA 01801
 Phone: 781 935-9070

EPA Reg. No. 74578-6
 EPA Est. No. 74578-MA-001

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Keep children and pets away from treatment area until injection and uptake are complete.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse. Wear protective eyewear.

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 ORNAMENTAL TREES

IMA-jet is a systemic insecticide used to control a variety of insect pests of ornamental trees and forest trees as listed in the table, "Applications for Use in Trees in Ornamental Landscapes & Forest and Woodland Areas". 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. Use rates are based on tree diameter for small, intermediate, and large (<12", 12-23" and >23" DBH, respectively) trees and for severity of infestation. The use of low to high rates is based on the professional judgment of the applicator as to what constitutes a light, moderate or severe infestation. Higher rates tend to provide longer residual and control of more difficult to control insects. In the case of severe infestation, use the highest label rate for the targeted pest. In trees larger than 23" 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 treatment.

The need for an application can be based on historical monitoring of the site, previous records or 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 (4½ feet 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 a 2 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 2 mL = 24 mL total dose per tree.
- 4) Divide 24 mL by 6 injection sites = 4 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 in Ornamental Landscapes & 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 24 mLs, place the remaining dosage 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.

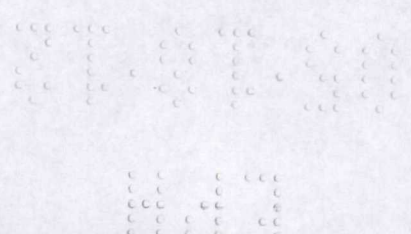
Use of IMA-jet

Use as formulated. Do not mix with water.

Compatibility

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

IMPORTANT: 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.



Applications for Use in Trees in Ornamental Landscapes & Forest and Woodland Areas				
Use Sites	Pest	Low Rate for Light to Moderate Infestation++	High Rate for Moderate to Severe Infestation++	Comments
Trees Including shade trees, ornamental trees, evergreens and palms In the following sites: Interior Plantscapes Non-urban Forests, Tree Plantations, Parks, Planted Christmas Trees, Rural Shelter Belts, Rangeland Trees Woodland Trees including Conifers	Adelgids (including Hemlock Woolly Adelgid*) Aphids Gall Wasps (including Erythrina Gall Wasp)	For trees <12" DBH,** apply 1.0 - 2.0 mL per inch trunk diameter ++ For trees 12-23" DBH,** apply 2.0 - 4.0 mL per inch trunk diameter ++	For trees <12" DBH,** apply 2.0 - 4.0 mL per inch trunk diameter ++ For trees 12-23" DBH,** apply 3.0 - 6.0 mL per inch trunk diameter ++ For trees >23" DBH,** apply 3.0 - 6.0 mL per inch trunk diameter ++	Space injection holes approximately 6" apart, around the base of the tree. In trees < 6" DBH, apply a minimum of three injection holes around the base of the tree.
	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) Pine tip moth larvae Roundheaded Borers (including Eucalyptus longhorned borer) Royal palm bug Sawfly larvae	For trees <12" DBH,** apply 2.0 mL per inch trunk diameter. For trees 12-23" DBH,** apply 4.0 mL per inch trunk diameter	For trees <12" DBH,** apply 4.0 mL per inch trunk diameter. For trees 12-23" DBH,** apply 6.0 mL per inch trunk diameter For trees >23" DBH,** apply 6.0 mL per inch trunk diameter	

*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.

**diameter breast height = 4½ feet from the ground.

++The use of low to high rates is based on the professional judgment of the applicator as to what constitutes a light, moderate or severe infestation. Higher rates tend to provide longer residual and control of more difficult to control insects. Dosage rates are designed for insect control and retreatment is generally not necessary during the year after initial treatment, however, a second application may be required within the same year in warmer climate states for the following insects with multiple or overlapping generations: aphids, leafhoppers, mealybugs, psyllids, soft scales, thrips and whiteflies.

Restrictions

- Do not make applications when trees are in flower to protect pollinating insects.
- This product is not to be used on trees that will produce food within 1 year (365 days) following treatment.
- Do not use on syrup-producing sugar maples where sap is harvested.

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, Sycamore and Katsura tree, including ALB host species as annotated and specified in contract documents by USDA-APHIS-PPQ.	Asian Longhorned Beetle	2 - 23"	2.0 mL
		24" +	4.0 mL

INFUSION PROCEDURES for ARBORJET MICRO-INFUSION™

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 and USDS tip Procedure:

6. Alternatively, insert the #2 (7/32" drill bit) STINGER or USDA 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 an 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. 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.

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 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.

