



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 7, 2019

Walter G. Talarek, Agent
W. Neudorff GmbH KG
c/o Walter G. Talarek PC
5153 Allison Marshall Drive
Warrenton, VA 20187-8980

Subject: Notification per PRN 98-10 – Adding Optional Marketing Claim to Page 6
Product Name: NEU1138I Ready-To-Use
EPA Registration Number: 67702-45
Application Date: March 16, 2018
Resubmission Date: August 2, 2019
Decision Number: 539696

Dear Mr. Talarek:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

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.

If you have any questions, you may contact please contact Briana Hanlon at (703) 347-8337 or by email at hanlon.briana@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Walsh".

Michael Walsh
Product Manager 11
Invertebrate & Vertebrate Branch 2
Registration Division
Office of Pesticide Programs

NEU1138I READY-TO-USE

Active Ingredients	By Wt.
Potassium Salts of Fatty Acids	0.940%
Spinosad (a mixture of spinosyn A and spinosyn D)	0.005%
Other Ingredients.....	99.055%
Total.....	100.000%

NOTIFICATION

67702-45

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

08/07/2019

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Reg. No. 67702-45

EPA Est. No.

FIRST AID

If in eyes: 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: 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the poison control center at 1-800-222-1212. [alternately insert supplemental distributor's toll free number and hours of operation].

NET CONTENTS: 16 ounces, 24 ounces, 32 ounces, 1 gallon, 5 gallons, 55 gallons, 200 gallons, 211 gallons (800 Liters), 250 gallons

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: **CAUTION.** Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

Environmental Hazards: This product is toxic to bees exposed to treatment for 3 hours following treatment. Do not apply this pesticide to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period. This product is toxic to aquatic invertebrates. 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 or 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.

DIRECTIONS FOR USE

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

For outdoor residential use in home gardens, lawns, and ornamentals and greenhouses (non-commercial). Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

Please read entire label before using. Use only as directed.

Shake container before use. Apply when listed pests are present. Thoroughly spray all plant parts to wetting, including undersides of leaves. Repeat applications may be made as indicated in the Use Restrictions section.

Apply when the first signs of powdery mildew appear and repeat at 7-10 day intervals. Do not exceed restrictions listed in the Use Restrictions section. This product must come into contact with powdery mildew to be effective. Complete coverage is essential for maximum control.

Do not use on sweet peas, nasturtiums, or delicate ferns. Use with care on new seedlings, transplants, and blooms. Do not spray during full sun. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait 2 days to determine if plant damage occurs prior to treatment of larger areas.

PESTS

Insects: This product will control pests such as: adelgids (woolly aphids), ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), aphids, armyworms, beetles (including Colorado potato beetle), borers, caterpillars, chinch bugs, codling moth, earwigs, fruit flies (including spotted wing *Drosophila*), gypsy moth, lace bugs, leafhoppers, leafminers, leafrollers, loopers, mealybugs, mites, mole crickets, plant bugs, psyllids, sawfly larvae (e.g. pear and rose slugs), scale insects, spider mites, tent caterpillars, thrips, webworms, weevils (including black vine weevil), and whiteflies.

Powdery Mildew: This product provides curative control of powdery mildew.

USE SITES

Vegetables, including: artichokes (globe), asparagus, beans, beets, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, corn, cucumbers, eggplants, garlic, lettuce, onions, peas, peppers, potatoes, radishes, rutabagas, spinach, squash, Swiss chard, tomatoes and turnips; **Fruits**, including: apples, avocados, apricots, cherries, grapes, melons, peaches, plums, citrus, pears; **Berries**, including: strawberries, blackberries, blueberries, boysenberries, loganberries, raspberries; **Herbs**, including: angelica, balm, basil, borage, burnet, chamomile, catnip, chervil (dried), chive, clary, coriander, costmary, cilantro, curry, dillweed, horehound, hyssop, lavender, lemongrass,

lovage, marigold, marjoram, mint, nasturtium, parsley, pennyroyal, rosemary, rue, sage, savory, sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood; **Peanuts, pistachios, Tree nuts**, including almond, cashew, chestnut, filbert, macadamia nut, pecan, walnut; **Outdoor Ornamentals; Greenhouses (Non-Commercial); Outdoor Container Grown Plants; Lawns; Turf.**

USE RESTRICTIONS

PHI - Do not apply within this many days of harvest.

Timing – Do not make applications less than this many days apart.

Max # of Appln. – Do not make more than the specific number of applications for the given time period.

BERRIES

PHI	Crop	Timing	Max # of Appln.
1 day	Caneberries (blackberry, loganberry, raspberry)	5 days	6/year*
	Strawberry	5 days	5/year
3 days	Bushberries (blueberry, currant, elderberry, gooseberry, huckleberry)	6 days	3/crop or 6/year
21 days	Cranberry	7 days	6/year

* year = calendar year

FRUITS

PHI	Crop	Timing	Max # of Appln.
1 day	Citrus (grapefruit, lemons, limes, oranges, tangerines)	6 days	3/year*
	Tropical tree fruits (avocado, guava, mango, papaya, passion fruit)	7 days	2/year
	Stone fruits (nectarines, peaches)	7 days	N/A
7 days	Grape	5 days	5/year
	Stone fruits (cherries, plums, prunes)	7 days	N/A
	Fig	7 days	4/year
	Dates	7 days	N/A
	Pome fruits (apples, crabapples, pears, mayhaw, quince)	10 days	4/year
	Pomegranate	N/A	N/A
	Pineapple (only for use in Hawaii)	7 days	6/year
14 days	Apricots	7 days	N/A
8 weeks	Banana and plantain (California, Florida, Hawaii and Texas only)	7 days	4/crop or 6/year

* year = calendar year

VEGETABLES

PHI	Crop	Timing	Max # of Appln.
1 day	Bulb vegetables (onion, garlic, green onion, leek, shallot)	4 days	5/year*
	<i>Brassica</i> (cole) crops (bok choy, broccoli, Brussels sprouts, cabbage, cauliflower, collards, kale)	4 days	6/year
	Corn (sweet corn, popcorn, seed corn)	N/A	6/year
	Cucumber	N/A	6/crop
	Fruiting vegetables (eggplant, pepper, tomato) and okra	4 days	6/year
	Leafy vegetables (except <i>Brassica</i> ; arugula, celery, lettuce, dock, endive, fennel, parsley, rhubarb, spinach, Swiss chard); watercress	4 days	6 year
2 days	Artichoke	7 days	4/crop
3 days	Legume vegetables (beans, peas, blackeyed peas)	5 days	6/crop
	Cucurbits (melons, cantaloupe, pumpkin, squash, watermelon)	5 days	6/crop
	Leaves of root, tuber and legume vegetables	4 days	6/year
	Root vegetables – Carrot, ginseng, parsnip	5 days	4/year
	Root vegetables – Radish, rutabaga, turnip	5 days	3/year
	Tuberous and Corm Vegetables (beets, sugarbeets)	7 days	4/crop
7 days	Potatoes, ginger, sweet potatoes, yams	7 days	4/crop
60 days	Asparagus**	4 days	3/crop

* year = calendar year

** For post harvest protection of ferns only. Do not apply within 60 days of spear harvest. Do not feed treated ferns to meat or dairy animals.

TREE NUTS, PEANUTS AND PISTACHIOS

PHI	Crop	Timing	Max # of Appln.
1 day	Tree nuts (almond, cashew, chestnut, filbert, macadamia nut, pecan, walnut); Pistachios	7 days	N/A
3 days	Peanut (not for use in California)	7 days	3/year*

* year = calendar year

HERBS

PHI	Crop	Timing	Max # of Appln.
1 day	Herbs (angelica, balm, basil, borage, burnet, chamomile, catnip, chervil (dried), chive, clary, coriander, costmary, cilantro, curry, dillweed, horehound, hyssop, lavender, lemongrass, lovage, marigold, marjoram, nasturtium, parsley, pennyroyal, rosemary, rue, sage, savory, sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood)	5 days	3/crop or 5/year*
7 days	Mint	4 days	3/crop or 4/year

* year = calendar year

Lawns, Turf, Outdoor Container-Grown Plants and Ornamentals (Herbaceous and Woody)

Uniformly spray foliage to point of runoff. Uniform coverage of upper and lower leaf surfaces is essential for effective insect control. Do not make applications less than 7 days apart.

Greenhouses (non-commercial)

Make localized area treatments of ornamental plants where pest problems are anticipated to occur rather than general area-wide broadcast treatments. Do not apply this product more than 10 times per year inside a greenhouse. If this product is being used for thrips, leafminer, spider mite and/or diamondback moth control, do not apply more than 6 times per year inside a greenhouse.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

CONTAINER DISPOSAL:

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

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

BATCH CODE:

[The registrant may use one or both of these two optional statements, either:

"WARRANTY

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated on this label only when used in accordance with directions under normal use conditions. To the fullest extent permitted by law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. Seller makes no other warranties, either expressed or implied."

or

OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product or refund your money. Simply send your name, address and proof of purchase to [insert name and address of supplemental registrant]."]

[The following claims and product information may or may not be presented on the product's label and labeling:

-Quick Facts

-Product Facts

-What it does: Kills insects

-Where to Use: For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens and in greenhouses

-Read the Label First!

-US Patent Number x,xxx,xxx

-Patent Pending

-Patented technology

-Patented insect killer

-Patented formula

-Ready-to-use

-Kills insects

-Insecticide (/Miticide) (/Fungicide)

-Insect spray

-Contact insecticide

-For control of foliage-feeding insect pests

-For control of lepidopterous larvae, leafminers, thrips, and other listed pests

-(CONTROLS) (KILLS): (Adelgids (woolly aphids)), (ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)), (aphids), (armyworms), (beetles (including Colorado potato beetle)), (borers), (caterpillars), (chinch bugs), (codling moth), (earwigs), (fruit flies (including spotted wing *Drosophila*)), (gypsy moth), (lace bugs), (leafhoppers), (leafminers), (leafrollers), (loopers), (mealybugs), (mites), (mole crickets), (plant bugs), (psyllids), (sawfly larvae (e.g. pear and rose slugs)), (scale insects), (spider mites), (tent caterpillars), (thrips), (webworms), (weevils (including black vine weevil)), (whiteflies) and other listed insect pests.

-Kills 30 listed insects

-Effective against a wide variety of insects

-(Controls) (Kills) insects

-Proven insect (killer) (kill) (control)

-Kills listed insects in minutes

-Kills listed insects fast

-Fast acting

-Kills listed insects through contact

-Provides quick control of listed pests

- Controls black vine weevils in rhododendrons

-Contains spinosad

-Spinosad is derived from the fermentation of a naturally occurring soil dwelling organism

-For use on (vegetables), (fruit and nut trees), (citrus), (berries), (herbs), (ornamentals), (shrubs), (flowers), (lawns), and (trees) (in homes gardens, and non-commercial greenhouses)

-Can be used in vegetable gardens

-Read entire container label before using this product

- Satisfaction guaranteed (or your money back)
- Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price
- Unconditionally guaranteed by [insert name of supplemental registrant]
- Easy to use
- Formulated to provide optimum spreading
- Effective against all life stages of insect pests
- This container is made from XX% recycled materials
- www.neudorff.com
- Manufactured under a license of W. Neudorff GmbH KG, Germany
- Sold under a license of W. Neudorff GmbH KG



- Neudosan™ is a trademark of W. Neudorff GmbH KG
- Made with Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG
- Contains Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG]
- For questions or comments call toll-free X-XXX-XXX-XXXX
- Questions, comments (or medical information) X-XXX-XXX-XXXX
- © 20XX Licensed (insert company name). World rights reserved.
- Manufactured/Distributed by: (insert company name)
- Made in/Produced in: _____ (from US and imported products/parts)
- See back (booklet) label (panel) for additional precautionary statements
- See additional precautionary statements on back panel



-For Organic Gardening

- Listed by the Organic Materials Review Institute (OMRI) for organic gardening
- OMRI Listed



Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,
 D-31860 Emmerthal, Germany
 011-49-5155-624-100
www.neudorff.com
 [in the alternative, the distributor's telephone number and website address
 may be used]