

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 09 2003

Craig Martens, Manager of Regulatory Services  
PBI/Gordon Corporation, Acme Division  
P.O. Box 014090  
Kansas City, Missouri 64101

Subject: Label Amendment Application Dated April 1, 2003  
EPA Registration No. 2217-837  
Label Revisions in response to Agency letter dated March 21, 2003

Dear Mr. Martens:

The amendment to revise and update your label in response to the Agency letter dated March 21, 2003, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) and section 4 when the Agency requires all registrants of similar products to submit such data.
2. Submit three (3) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels.

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 bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely,

Sheryl K. Reilly, Chief, BPB  
Biopesticides and Pollution Prevention Division  
7511C

Enclosure

CONCURRENCES

SYMBOL	7511C	7511C					
SURNAME	Martens	Hicks	Reilly				
DATE	6/9/03	6/9/03	6/9/03				

278

# EI-783

**ACCEPTED**  
 JUN 09 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, on extended, for the pesticide registered under EPA Reg. No. 2217-837

**ACTIVE INGREDIENT:**  
 Azadirachtin ..... 0.20%

**OTHER INGREDIENTS:** ..... 99.80%

**TOTAL** 100.00%

Contains 0.016 Lb. (7.25 grams) azadirachtin per gallon

## KEEP OUT OF REACH OF CHILDREN


## CAUTION

### First Aid

<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.</p>	

See (attached booklet, back/side panel) for additional Precautionary Statements,  
 First Aid and full Directions for Use.

**NET CONTENTS: (1 pint, 1 quart, 1 gallon)**

660/ AP-----  
 EPA REG. NO. 2217-837  
 EPA EST NO 2217-KS-1  
 MANUFACTURED BY:  
  
 All Employee-Owned Company  
 1217 West 12th Street  
 Kansas City, Missouri 64101  
[www.pbigordon.com](http://www.pbigordon.com)

3 7 8



**READ ENTIRE LABEL BEFORE EACH USE. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.**

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if absorbed through skin or if inhaled. Avoid breathing vapor. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**ENVIRONMENTAL HAZARDS:**

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

**DIRECTIONS FOR USE**

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

Do not enter treated areas without protective clothing until sprays have dried.

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants for aesthetic purposes, ornamental gardens or parks, and grounds.

**Product Description:**

Azadirachtin is an insect growth regulator that inhibits growth and disrupts molting. Azadirachtin is effective as a repellent for certain insects, such as: armyworms, leafrollers, cutworms, beetles and leafminers. Also, azadirachtin serves as a feeding deterrent for some insects.

This product controls pests by contact or by ingestion. Azadirachtin is effective on certain stages of pest growth: larvae, nymphs, and pupae.

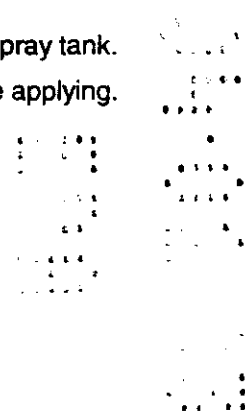
**Equipment For Foliar Applications:**

This product may be applied with hand-operated (manual) or power spray equipment suitable for low volume and/or high volume applications. Follow the instructions of the equipment manufacturer when using backpack sprayers, hose-end sprayers, compression (pump-up) sprayers, and other garden sprayers suitable for foliar application of insecticides.

**Spray preparation with water:**

**A. For Pump Sprayers:**

1. Shake container well before using.
2. Mix only the amount of product needed for the area to be treated.
3. Add one-half (1/2) of the required amount of water to the spray tank.
4. Measure the listed amount of product and pour the product into the spray tank.
5. Add the balance of water to the spray tank and mix thoroughly before applying.
6. Clean the spray equipment following application.



**B. For Hose End Sprayers:**

1. Shake container well before using.
2. Determine the area in square feet (sq.ft.) to be treated.
3. Refer to the table for the listed amounts of product.
4. Measure the listed amount of product and pour the product into the sprayer jar (bottle).
5. Add water to the appropriate level marked on sprayer jar (bottle) and mix.
6. Attach the sprayer to the garden hose and apply uniformly to the area to be treated.
7. For ornamentals, trees and shrubs presented in Tables 6 and 7: Apply as a fine spray to the upper and lower leaf surfaces on a spray-to-wet basis.
8. Clean the spray equipment following application.

**Application Schedules (When To Use):**

Make applications when the pests first appear, when the pests are in the early growth stages, or when the plant damage is noticed. Azadirachtin is most effective when applied before the insects or eggs are present in large numbers.

Make multiple applications on 7-10 day intervals depending upon the severity of the pest problem. The 7-day application schedule is used for difficult to control pests or for dense infestations.

For food crops, make applications of azadirachtin throughout the growing season including the day of harvest.

Make applications during early to mid-morning and during late afternoon to early evening. This is important to maximize the spray contact on the pests and to minimize the potential for leaf burn.

**Dosage Rates With Foliar Applications (How Much To Use):**

Determine the best application rate for your specific situation by referring to Tables 1-7. Select the proper amount described for the plants and the pests to be controlled. The lower application rate within the range is used for low pest infestations or used in conjunction with conventional insecticides. The higher application rate within the range is used for high pest infestations and/or troublesome pests.

For all applications, thorough plant coverage is essential for the best results. For the spray-to-wet applications presented in Tables 6 and 7, apply as a full cover spray to the drip point.

Spray penetration of dense foliage and thorough coverage of all parts of the shrubs, trees, and ornamentals are essential. Azadirachtin is exempt from the requirements of a tolerance for food crops when used as a pesticide at 20 grams (2.75 gallons of product) or less per acre per application on all raw agricultural commodities (40 CFR 180.1119).

**Advisory Statements:**

- Always check for leaf burn/damage/bronzing on a small scale before using on a large scale.
- Use care with this plant oil-based product on plants with tender/succulent tissues (eg. open blossoms of flowers, shrubs, and trees). Azadirachtin has been evaluated for phytotoxicity on a wide range of plants and ornamentals. Test on a small scale (small portion of the area to be treated) before using on a larger scale (entire plant or treated area).

**Table 1**

Curcubits	Pests	Early Season fl.oz./ 1,000 sq.ft.	Late Season fl.oz./ 1,000 sq.ft.	Early Season Tablespoons/ 1,000 sq.ft.	Late Season Tablespoons/ 1,000 sq.ft.
cantaloupe, cucumber, gherkin, gourd, honeydew melon, pumpkin, squash, watermelon	budworms, fall armyworms, leafminers, melonworms, pickleworms	1.5 - 3.0	3.0 - 6.0	2.4 - 6.0	6.0 - 12.0

Apply 1 gallon of spray solution per 1,000 sq.ft. of area to be treated.

**Table 2**

Bulb and Cole Vegetables	Pests	Early Season fl.oz./ 1,000 sq.ft.	Late Season fl.oz./ 1,000 sq.ft.	Early Season Tablespoons/ 1,000 sq.ft.	Late Season Tablespoons/ 1,000 sq.ft.
broccoli, Brussels sprouts, cabbage, cauliflower, Chinese spinach, collard, endive, garlic, kale, kohlrabi, lettuce, mustard greens, onion, parsley, rhubarb, shallots, spinach, Swiss chard, turnip tops	armyworms, cabbage loopers, caterpillars, cutworms, diamondback moth, hornworms, imported cabbageworm, leafminer, thrips, webworms	1.5 - 3.0	3.0 - 6.0	3.0 - 6.0	3.0 - 12.0
	aphids, weevils	1.0 - 1.50	1.5 - 3.0	1.5 - 3.0	3.0 - 6.0

Apply 1 gallon of spray solution per 1,000 sq.ft. of area to be treated.

**Table 3**

Legume Vegetables	Pests	Early Season fl.oz./ 1,000 sq.ft.	Late Season fl.oz./ 1,000 sq.ft.	Early Season Tablespoons/ 1,000 sq.ft.	Late Season Tablespoons/ 1,000 sq.ft.
beans, chick pea, eggplant, ground cherry, lentils, pea, pepper, tomato	armyworms, cabbage loopers, caterpillars, cutworms, garden webworms, hornworms, leafminers, loopers, tomato fruitworms, tomato pinworms	1.5 - 3.0	3.0 - 6.0	2.4 - 6.0	6.0 - 12.0
	bean leaf beetles, Colorado potato beetles, Mexican bean beetles, pepper weevils, weevils	1.5 - 3.0	3.0 - 6.0	3.0 - 6.0	6.0 - 12.0

Apply 1 gallon of spray solution per 1,000 sq.ft. of area to be treated.

**Table 4**

Root and Tuber Vegetables	Pests	Early Season	Late Season	Early Season	Late Season
		fl.oz./ 1,000 sq.ft.	fl.oz./ 1,000 sq.ft.	Tablespoons/ 1,000 sq.ft.	Tablespoons/ 1,000 sq.ft.
beets, carrot, parsnip, potato, radish, rutabaga, sweet potato, turnip, yams	aphids, armyworms, cabbage loopers, caterpillars, diamondback moths, hornworms, leafhoppers, webworms	1.5 - 3.0	3.0 - 6.0	3.0 - 6.0	6.0 - 12.0
	Colorado potato beetles, potato flea beetles	1.0 - 1.50	1.5 - 3.0	1.5 - 3.0	3.0 - 6.0

Apply 1 gallon of spray solution per 1,000 sq.ft. of area to be treated.

**Table 5**

Small Fruits and Berries	Pests	Early Season	Late Season	Early Season	Late Season
		fl.oz./ 1,000 sq.ft.	fl.oz./ 1,000 sq.ft.	Tablespoons/ 1,000 sq.ft.	Tablespoons/ 1,000 sq.ft.
blackberry, blueberry, boysenberry, elderberry, gooseberry, grape, huckleberry, loganberry, raspberry, strawberry	armyworms, blueberry leafrollers, caterpillars, fruit tree leafrollers, grape berry moths, grape fruitworms, grape leafrollers, hornworms, loopers	1.5 - 3.0	3.0 - 6.0	3.2 - 6.0	6.0 - 12.0

Apply 1 gallon of spray solution per 1,000 sq.ft. of area to be treated.

**Table 6**

Citrus, Pome and Stone Fruit	Pests	Early Season	Late Season	Early Season	Late Season
		fl.oz./1 gallon of water	fl.oz./1 gallon of water	Tablespoons/ 1 gallon of water	Tablespoons/ 1 gallon of water
apple, apricot, cherry, grapefruit, lemon, lime, nectarine, orange, peach, pear, plum, quince	aphids, caterpillars, fall webworms, fruit flies, leafhoppers, leafminers,	1.0 - 1.5	1.5 - 3.0	1.5 - 2.6	2.6 - 5.2
	thrips	1.0 - 1.5	1.5 - 3.0	1.5 - 2.6	2.6 - 5.2
	beetles, grasshoppers, weevils	1.0 - 2.0	2.0 - 3.0	1.5 - 3.5	3.1 - 5.2

For the spray-to-wet applications, apply as a full cover spray to the drip point. Spray penetration of dense foliage and thorough coverage of all parts of the shrubs, trees, and ornamentals are essential.

Table 7

Bedding Plants, Outdoor Flowers, Landscapes, Ornamental, Trees and Shrubs	Pests	Early Season	Late Season	Early Season	Late Season
		fl.oz./1 gallon of water	fl.oz./1 gallon of water	Tablespoons/ 1 gallon of water	Tablespoons/ 1 gallon of water
amaranthus, aster, azalea, ferns, boxwood, carnation, chrysanthemum, crape myrtle, dahlia, daisy, euonymus, ficus (fig), gardenia, holly, impatiens, iris, ivy, jasmine, lilac, lily, marigold, pittosporum, privet, pyracantha, rhododendron, rose, spirea, zinnia,	beetles, thrips, weevils	1.0 - 2.0	2.0 - 3.0	1.75 - 3.5	3.5 - 5.2
<b>Trees including, but not limited to:</b> ash, birch, cedar, cotoneaster, cypress, dogwood, fir, elm, juniper, maple, oak, pine, spruce, willow	armyworms, aphids, caterpillars, hornworms, leafminers, loopers, psyllids, spruce budworms, tent caterpillars, webworms, whiteflies	1.0 - 1.5	2.0 - 3.0	1.75 - 2.6	3.5 - 5.2

For the spray-to-wet applications, apply as a full cover spray to the drip point. Spray penetration of dense foliage and thorough coverage of all parts of the shrubs, trees, and ornamentals are essential.

**STORAGE AND DISPOSAL**

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

**STORAGE:** Keep in original container.

**PESTICIDE DISPOSAL:** Securely wrap original container in several layers of newspaper and discard in trash.

**CONTAINER DISPOSAL:** Do not reuse container (bottle, can, jar). Rinse thoroughly before discarding in trash.

**LIMITED WARRANTY AND DISCLAIMER.**

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

**APPENDIX**

***I. Advertising claims that may be used:*** These claims may be presented on the retail container label or on labeling accompanying the product.

- ◆ Broad spectrum biochemical insecticide.
- ◆ Apply early and at 7 to 10 days interval until insects are no longer present.
- ◆ The contents of this container makes up to 16 gallons of spray solution.
- ◆ For use with hose-end or pump-up sprayers.
- ◆ Effective against target pests: aphids, whiteflies, thrips, armyworms, leafhoppers, leafrollers, cutworms, loopers, beetles, weevils, and leafminers.
- ◆ Spray vegetables up to and including the day of harvest.
- ◆ Insect growth regulator, repellent, antifeedant.
- ◆ (Product Name) is a registered trademark of (Company Name).

