

1177

**NOTICE OF PESTICIDE:**  REGISTRATION  
 REREGISTRATION  
(Under the Federal Insecticide, Fungicide,  
and Rodenticide Act, as amended)

TERM OF ISSUANCE

NAME OF PESTICIDE PRODUCT

**Ringer® Attack Soap Concentrate**

NAME AND ADDRESS OF REGISTRANT (Include ZIP code)

Eliot Harrison  
Delta Analytical Corporation  
7910 Woodmont Avenue  
Suite 1000  
Bethesda, MD 20814

5448752 674  
22

**NOTE:** Changes in labeling formula 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 U.S. 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.

A copy of the labeling accepted in connection with this Registration/Reregistration is returned herewith.

Registration is in no way to be construed as an indorsement or approval of this product by this 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.

Based on your response to the Reregistration Eligibility Document, the product listed above is reregistered provided that you make the following changes to your label:

1. The Signal word to this product is "WARNING" based on the results of the primary eye and skin irritation studies. Usually the Agency assigns a toxicity category based on the most severe data cited for a product. However, in the case of this product, data was submitted that strongly conflicted with the toxicity category I rating of one of the submitted skin irritation studies. Four of the five of the primary skin irritation studies submitted would give this product a "Caution" signal word; however, the Agency cannot ignore the results of the other skin irritation study. A concession was made and EPA Reg. No. 36488-45 was assigned toxicity category II for primary skin irritation.

2. The precautionary statements must state:

"Causes substantial, but temporary eye injury. Causes skin irritation. Do not get on skin, in eyes or on clothing. Wear goggles or safety glasses. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse."

3. The statements of practical treatment must state:

"If in eyes: Hold eyelids open and flush with a steady, gentle stream of

ATTACHMENT IS APPLICABLE

SIGNATURE OF APPROVING OFFICIAL

*[Signature]*

DATE **SEP 25 1995**

Edwards

A: 36488 145.1

9/22/95

water for 15 minutes. Get medical attention.

**If on skin:** Wash with plenty of soap and water. Get medical attention.

**If inhaled:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention."

This action is taken under the authority of section 4(g)(2)(C) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of your product.

The Agency may bring misbranding action under section 12(a)(1)(E) of FIFRA or may cancel or suspend the registration of your product under section 6 if you distribute or sell products not bearing revised labeling after 45 days from the receipt of this letter. Because of the time frame set forth above, registrants may sticker over the current label with the new signal word and precautionary labeling specified in this letter without receiving prior approval of amended labeling. However, registrants must also submit amended labeling to Product Manager 14, Registration Division (7505C) for Agency approval within 30 days of their receipt of this letter.

You are also required to correct the labeling of products under your custody and control (i.e., warehouses, etc...). You are not required to sticker over stocks in the channels of trade.

Submit one copy of the final printed label before releasing the product for shipment with the revised labeling. A copy of the stamped label is enclosed. If you have any questions about this letter, please contact Beth Edwards at (703) 305-5400 or (703) 305-6600.

Sincerely yours,



Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

SEP 25 1995

Draft Master Label Amendment  
June 21, 1993  
36488-45  
Page 1 of 7

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

36488-45

Kills Aphids!  
Kills Whiteflies!  
Kills insects fast! Leaves no residue!

**Ringer®  
Attack® Soap Concentrate**

For Use on Fruits, Nuts, Vegetables, and Ornamentals

**Active Ingredients**

Potassium Salts of fatty acids . . . . .	49.5% by weight
Inert Ingredients . . . . .	50.5% by weight
Total . . . . .	100% by weight

Keep Out of Reach of Children

**CAUTION**

See back panel for additional precautionary statements  
Net Contents 8 oz., 16 oz., 32 oz., 64 oz.  
1, 2.5, 5, 30, 55 gallons and bulk

Ringer® Attack® Soap Concentrate is an effective contact insecticide that is ideal for use in areas such as parks, restaurants, hospitals, school grounds, malls, and other public places, as well as in agriculture, horticulture, golf courses, and greenhouses. Ringer® Attack® Soap Concentrate effectively controls:

- |              |                   |
|--------------|-------------------|
| Adelgids     | Psyllids          |
| Aphids       | Sawfly larvae     |
| Earwigs      | Scales            |
| Grasshoppers | Spider Mites      |
| Lace Bugs    | Tent caterpillars |
| Leafhoppers  | Thrips            |
| Mealybugs    | Whiteflies        |
| Plant bugs   | Woolly aphids     |

Ringer® Attack® Soap Concentrate offers effective insect control on a wide variety of cultivars in ornamental, horticultural and agricultural settings.

- |                |            |
|----------------|------------|
| Foliage Plants | Fruits     |
| Flowers        | Tree Nuts  |
| Trees & Shrubs | Vegetables |

Draft Master Label Amendment  
36488-45  
June 21, 1993  
Page 2 of 7

**Back Label:**

**Ringer® Attack® Soap Concentrate:**

- \* Can be applied up to time of harvest
- \* Can be used as an effective component of integrated pest Management programs.

**PRECAUTIONARY STATEMENTS**

**HAZARD TO HUMANS AND DOMESTIC ANIMALS:**

**CAUTION:** Harmful if swallowed. May cause skin and eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing of spray mist.

**ENVIRONMENTAL HAZARDS**

This product may be hazardous to aquatic invertebrates. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of water.

**PHYSICAL OR CHEMICAL HAZARDS**

Flammable, keep away from heat and open flame.

**Statement of Practical Treatment (First Aid):** In case of skin or eye contact, flush with plenty of water. Get medical attention if irritation persists.

**Reentry Protection:** No reentry interval is required.

**DIRECTIONS FOR USE**

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

For best results, use freshly mixed solution. Use soft water whenever possible. If water has a high mineral content and produces soap scale, pre-treat water with an approved softening agent or a pesticide compatibility agent before adding concentrate. To prevent or minimize foaming, avoid use of mechanical agitation, place filling hose below surface of spray solution, terminate by-pass and return lines at bottom of tank; if needed, use approved antifoam or defoaming agent. **CAUTION:** Do not use on new transplants, newly rooted cuttings, or plants stressed by drought. Avoid application when leaf temperature exceeds 85°F.

5/9

Draft Master Label Amendment  
36488-45  
June 21, 1993  
Page 3 of 7

**WHEN USED ALONE:** Ringer® Attack® Soap Concentrate may be used up to and including day of harvest, and is useful as a component of Integrated Pest Management (IPM) systems.

Dilute at the rate of 2 gallons of concentrate to 100 gallons of water, except as noted in individual sections. Apply according to the rates and other directions given under the individual crop groupings. Spray should be applied to thoroughly wet all infested surfaces.

**WHEN COMBINED WITH OTHER PESTICIDES:**

Ringer® Attack® Soap Concentrate may be combined with other pesticides to broaden the target spectrum, improve the level of kill and enhance coverage. Such use should conform to accepted use precautions and directions for use of both products. Attack® Soap Concentrate may be tank mixed by adding 1 gallon of concentrate per 100 gallons of spray containing the label amount of the companion pesticide or less, except where prohibited by local regulation. Products with which it may be tank mixed include, but are not limited to, *Bacillus thuringiensis*, pyrethrum, and a variety of petrochemical-based pesticides.

**Indoor plants:** Mix one part concentrate with 50 parts water, or 2.5 fl. oz. per gallon. Apply when insects or signs of their damage appear. Take care to thoroughly wet all surfaces of infested foliage or branches. For aphids examine plants after two days and spray again if needed. For other pests spray at 7 to 10 day intervals as needed up to three times. Do not make repeated sprays at short intervals without thoroughly rinsing foliage. For blossom thrips on African violets, spray to contact thrips on the blooms. Root mealybug and springtail infestations can be reduced using a soil drench of one to two tablespoons of concentrate in a quart of tepid water applied monthly.

**NOTE:** Do not use on Crown of Thorns and test on other euphorbias for phytotoxicity before full-scale application. Do not use on dracaena, delicate ferns, dieffenbachia, ornamental ivies, palms or succulents without testing.

**FLOWERS AND BEDDING PLANTS GROWING OUTDOORS AND IN GREENHOUSES,** foliage plants, roses and succulents. Mix two gallons of concentrate per 100 gallons of water or 2.5 fl. oz. per gallon. Apply when insects appear. Take care to thoroughly wet all infested surfaces. A second application should be timed to control newly hatched young. Repeat weekly as needed up to three times. For earwigs spray directly on insects after disturbing their hiding place.

Draft Master Label Amendment

36488-45

June 21, 1993

Page 4 of 7

NOTE: Do not use on bleeding heart, jade plant, lantana, lillies or sweetpeas. Some varieties of azaleas, begonias, camellias, fuschias, gardenias, orchids, and impatiens have shown sensitivity. If wilting occurs within a few hours rinse with clean water spray. Do not apply to poinsettias after bract coloration begins. Test on chrysanthemums for varietal sensitivity and do not apply to open blooms.

Attack® Soap Concentrate mixed 2 gallons per 100 gallons of water may be used as a soil drench to control listed pests in the growing medium of container grown plants.

ORNAMENTAL LANDSCAPE TREES AND SHRUBS, Christmas trees and ornamental plantings in parks, gardens and along rights-of-way. Mix two gallons of concentrate per 100 gallons water or 2.5 fl. oz. per gallon. To control the crawler stage of adelgids, psyllids, and scales spray to wet bark surface when infestation warrants. For mites and other listed pests, be sure to wet underside of leaves and needle sheaths.

For tent caterpillars, mix 1 gallon of concentrate to 30 gallons of water or 4 fl. oz. per gallon and spray directly on young larvae when congregated on outside of tent.

To control Balsam wooly aphid on true firs (*Abies spp.*) mix one gallon of concentrate to 80 gallons of water or approximately 1.5 fl. oz. per gallon. Spray trees thoroughly when crawlers are abundant in early spring and/or fall. For best results make a second application after ten days.

To control Spruce Wooly Aphid mix 1 gallon of concentrate to 25 gallons of water or 5 fl. oz. per gallon. Spray spruce thoroughly in fall or spring before females begin egg laying; on Douglas fir spray before bud break or in the fall after foliage has hardened off.

To control conifer aphids, sawfly larvae and pine needle scale mix 1 gallon of concentrate per 40 gallons of water or 3 fl. oz. per gallon and spray to thoroughly wet foliage when insects are present.

NOTE: Do not apply to chestnut, Japanese maple, mountain ash, or Colorado blue spruce. Do not apply to ornamentals stressed by drought or when tender new foliage is present. Do not apply when leaf temperature exceeds 85°F. Test on Arborvitae, Eugenia and Euonymus for varietal and drought sensitivity. Insecticidal Soap sprays may result in the temporary removal of the glaucous bloom from spruces. To suppress gypsy moth populations, prevent egg hatch by applying a spray solution of 1 quart concentrate to 3 quarts of water directly to egg masses; do not allow spray to contact plant foliage.

Draft Master Label Amendment  
36488-45  
June 21, 1993  
Page 5 of 7

**VEGETABLES GROWING OUTDOORS AND IN GREENHOUSES:** Mix two gallons of concentrate to 100 gallons of water or 2.5 fl. oz. per gallon. Apply when insect or mite populations attain spray threshold. Spray to wet all infested plant surfaces. Application volume per acre sprayed will vary according to size and growth form of plants. Row crops will typically require 50 to 150 gallons of spray per acre. For most pests repeat applications over a two week period. May be used up to day of harvest.

**NOTE:** Do not apply during heat of the day or when leaf temperature exceeds 85°F.

**ROOT AND TUBER VEGETABLES:** Carrot, potato, radish and sugar beet to suppress aphids, and control leafhoppers, plant bugs and whitefly. Use up to day of harvest.

**BULB VEGETABLES:** Onion and garlic to suppress thrips. Use up to day of harvest.

**LEAFY VEGETABLES:** Lettuce, celery and spinach to control whitefly and mites and to suppress aphids. Use up to day of harvest.

**BRASSICA (cole) LEAFY VEGETABLES:** Broccoli, brussels sprouts, cabbage, Chinese cabbage (Bok choy) and kale to control leafhoppers, plant bugs and whitefly and to suppress aphids. Use up to day of harvest.

**NOTE:** Do not spray on crop prior to application of or tank mix with a topically applied liquid nitrogen fertilizer.

**LEGUME VEGETABLES:** Beans, peas and soybeans to control aphids, grasshoppers, whitefly and spider mites. Use up to day of harvest.

**FRUITING VEGETABLES:** Eggplant, pepper and tomato, to control whitefly and spider mites and to suppress aphids. Use up to day of harvest.

**CUCURBIT VEGETABLES:** Cucumber, melon and summer squash to control plant bugs and whitefly and suppress aphids and mites. Use up to day of harvest. Always apply to cucumbers at night or during the coolest part of the day.

**HERBS AND SPICES:** Basil, chives, dill marjoram, and sage to control whitefly, and to suppress aphids and mites. Use up to day of harvest.

**FRUITS AND NUTS:** Mix two gallons of concentrate to 100 gallons of water or 2.5 fl. oz. per gallon. Spray when insects or mites first appear or when their populations attain spray level. Apply to achieve thorough coverage of infested foliage and/or branches. Repeat at weekly intervals as needed. Avoid spraying when blossoms are present. Use up to day of harvest.

**CITRUS FRUITS:** Sweet orange, lemon and grapefruit to control aphids, cottony cushion scale, black scale, red scale and mites. Use up to day of harvest.

**NOTE:** Some marking of fruit may occur, especially when spray run-off occurs or when sooty mold is present.

419

Draft Master Label Amendment

36488-45

June 21, 1993

Page 6 of 7

**POME FRUITS:** Apple and pear to control leaf hoppers, scale crawlers, pear psylla, pear slug (*Tenthredinidae*) and to suppress aphids and mites. Use up to day of harvest.

**NOTE:** Spray may cause localized marking of some varieties particularly apple varieties such as red and golden delicious, Gravenstein, and pear varieties such as d'Anjou, Comice and Asian.

**STONE FRUITS:** Cherry, peach and plums to control scale insects and suppress aphids and mites. Use up to day of harvest.

**NOTE:** Spray may cause localized spotting of nectarines and may remove wax bloom from plums.

**SMALL FRUITS AND BERRIES:** Blackberry, coffee, cranberry, grape and strawberry to control leafhoppers, mealybugs, scales and whitefly and to suppress aphids and mites. Use up to day of harvest.

**NOTE:** Do not spray grapes during the period between the start of blooming and 2 to 3 days post shatter. Application made with dilute spray equipment (more than 75 gallons of spray per acre) and/or tank mixes containing sulfur may mark fruit of grapes; dilute applications are not recommended on varieties being grown for the fresh produce market including but not limited to flames, globes and perlettes as marking of fruits may occur. Do not use on Labrusca varieties or Italia and Calmeria varieties grown for the fresh market.

**TREE NUTS:** Almond, English walnut and pecan to control scale crawlers and suppress aphids and mites. Use up to day of harvest.

**ADDITIONAL CROPS:** Asparagus, coffee, cotton, and subtropical and tropical crops. Mix two gallons of concentrate to 100 gallons of water or 2.5 fl. oz. per gallon. To control aphids, whitefly and mites spray when insects appear and repeat at weekly intervals as needed. Do not use at intervals of less than seven days. Use up to day of harvest.

**NOTE:** Do not use on passion fruit or guava. Test for varietal sensitivity against other tropical fruits before full-scale application.

**POST HARVEST APPLICATIONS**

Attack® Soap Concentrate may be used alone or in tank mixes to control or suppress insect and mite pests of perennial crop plants after harvest has been completed.

Post-harvest applications provide a means of reducing residual populations, and are a useful component of IPM programs.



Draft Master Label Amendment  
36488-45  
June 21, 1993  
Page 7 of 7

**STORAGE AND DISPOSAL**

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

**STORAGE:** Store only in original container; in a dry place; inaccessible to children or pets. Do not store full or partial containers in direct sunlight. Keep container tightly sealed when not in use.

**DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Do not reuse empty container. Triple rinse, then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill or by incineration, if allowed by state and local authorities. If burned, stay out of smoke.

For containers of one gallon or less: do not reuse empty container. Triple rinse thoroughly before discarding in trash.

**COVERAGE:** Gallons Finished Product at the following rates:

<u>Bottle Size</u>	<u>2.5 oz/gal</u>	<u>4.0 oz/gal</u>	<u>1.5 oz/gal</u>
8 oz.	3.2 gal	2.0 gal	5.3 gal
16 oz.	6.4 gal	4.0 gal	10.6 gal
32 oz.	12.8 gal	8.0 gal	21.2 gal
64 oz.	25.6 gal	16.0 gal	42.4 gal
1 gal.	51.2 gal	32.0 gal	84.8 gal

One (1) gallon of finished product will treat:

- one (1) tree, 10' high by 8' diameter (2" - 4" trunk)
- ten (10) shrubs, 4' high by 4' diameter
- eighty (80) plants, 2' high by 2' diameter

Ringer Corporation will not accept liability for damage or injury resulting from misuse.

EPA Reg. No. 36488-45

C	H	T
EPA Est. No. 63456-MN-001	44616-MC-001	42705-MN-001

Circled or superscript number corresponds to the first letter of the lot code on the bottom or back of the container.

Manufactured by Ringer Corporation, 9959 Valley View Road, Minneapolis, MN 55344 (612) 941-4180