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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 18 2001

Walter G. Talarek, P.C.
Agent for: W. Neudorff GmbH KG
1008 Riva Ridge Road
Great Falls, Virginia 22066

Subject: NEU1140F RTU Copper Soap
EPA Registration No. 67702-1
Your label amendment dated July 12, 2001

Dear Mr. Talarek,

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, provided that you comply with the following conditions.

1. Make the following changes to the labeling.

a. In the "Optional wording that may or may not appear on the label:" on page 5, delete "Ideal" in the claim "Ideal for Roses, Fruits & Vegetables". "Ideal" is not a supportable claim.

b. In the "Optional wording that may or may not appear on the label:" on page 5, remove the statement "Fixed Copper is Suitable for Organic Gardening". EPA has not established guidelines for accepting claims for organic chemicals at this point.

c. Toward the bottom of page 5, delete the sentence "The National Organic Standards Board of the USA allows fixed copper to be used in organic crop production for controlling plant diseases."

d. Delete the short paragraph entitled "Rusts" on page 6. Rust and White Rust are not related. There is already a paragraph on rusts and White Rust is described under downy mildews.

2. Submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration may 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.

If you have any questions about this letter, please contact John Bazuin at (703)305-7381.

Sincerely yours,



Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Attachment: Label stamped "ACCEPTED with COMMENTS"

NEU1140F RTU COPPER SOAP**Liquid Copper Fungicide Ready-To-Use****Active Ingredient:**

Copper Octanoate (Copper Soap) 0.08%

Inert Ingredients 99.92%

Total 100.00%

metallic copper equivalent 0.017%.

EPA Registration #67702-1

EPA Establishment #67702-WG-1

Net Contents:

KEEP OUT OF REACH OF CHILDREN**CAUTION**

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. -Call a poison control center or doctor for treatment advice.
IF ON SKIN	-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	-Call a 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 by a poison control center or doctor. -Do not give anything by mouth to an unconscious person.
IF INHALED	-Move person to fresh air. -If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. -Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

ACCEPTED
with COMMENTS
In EPA Letter Dated:

SEP 18 2001

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

67702-1

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: Caution: Harmful if swallowed, absorbed through skin or inhaled. Wash thoroughly with soap and water after handling. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and aquatic organisms. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

STORAGE AND DISPOSAL**Storage**

Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. Product may be damaged by freezing. Do not store product below 40°F (4°C). If spilled, use absorbent materials and dispose of in an approved manner.

Disposal

Do not reuse container. Securely wrap original container in several layers of newspaper and discard in trash.

DIRECTIONS FOR USE

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

Read and follow all applicable directions and precautions on this label before using.

Application Directions

[The registrant may use either of the following application directions paragraphs, either:]

“Using the provided hand-pump sprayer, spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. One quart will treat 10 square yards (1.0 L will treat 10 m²)

To control **powdery mildews**, begin treatment 2 weeks before disease normally appears. Alternatively, begin treatment when disease first appears, and repeat at 7 to 10 day intervals for as long as needed. Spray every 7 days when the amount of disease is increasing rapidly. If possible, time applications so that 12 hours of dry weather follow application. On plants that are very susceptible to powdery mildew, such as home-greenhouse-grown cucumber, it is best to spray

the plants twice a week during the first 2 weeks after emergence, and weekly thereafter. On outdoor plants, re-apply after rain.

To control **downy mildews, leaf and fruit spots, blights, and rust**, begin treatment 2 weeks before disease normally appears or when weather forecasts predict a long period of wet weather. Alternatively, begin treatment when disease first appears, and repeat at 7 to 10 day intervals for as long as needed. Spray all plant parts thoroughly. Re-apply following heavy rain. Apply every 7 days when the amount of disease is increasing rapidly. Sprays every 5 to 7 days should be used for preventing late blight on potato and related plants. If possible, time applications so that at least 12 hours of dry weather follows application.

To prevent **fruit rots**, spray NEU1140F RTU COPPER SOAP thoroughly onto flowers and fruit. Apply at the start of flowering and continue every 7 to 10 days until harvest. Fungicidal sprays are especially warranted when weather forecasts predict a long period of wet weather. Re-apply after rain.

OR

Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. 22 fluid ounces will treat 7 square yards.

Begin treatment 2 weeks before disease normally appears or when disease first appears, and repeat at 7 to 10 day intervals for as long as needed. Re-apply after rain."

GRAPES

Note: Do not mix NEU1140F RTU COPPER SOAP with lime. Certain Vinifera and French Hybrid varieties may be sensitive to copper sprays resulting in marginal leaf burn. Before spraying these varieties, consult your State Experiment Station or make test sprays.

Downy mildew, Black rot, Phomopsis Cane and Leaf Spot, Powdery mildew
Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. For best control begin treatment when new growth reaches ½ inch and repeat at 7 to 14 day intervals throughout the growing season.

Gray mold (Fruit rot)

Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. For best control begin treatment at the end of bloom and repeat at 7 to 14 day intervals until 3 weeks before harvest.

ORNAMENTAL PLANTS

African violet - Bacterial leaf spot and blight, Botrytis blight, Leaf spot, Powdery mildew
 Aluminum plant - Bacterial leaf spot and blight, Anthracnose, Leaf spot, Rhizoctonia blight
 Aralia - Anthracnose, Bacterial leaf spot and blight, Leaf spot
 Areca palm - Leaf spot
 Bird's nest fern - Bacterial leaf spot and blight
 Boston fern - Bacterial leaf spot and blight, Botrytis blight, Rhizoctonia blight
 Bromeliad - Anthracnose, Bacterial leaf spot and blight
 Cactus - Leaf spot
 Caladium - Bacterial leaf spot and blight, Rhizoctonia blight
 Chinese evergreen - Anthracnose, Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight, Soft rot
 Corn plant - Bacterial leaf spot and blight, Botrytis blight, Leaf spot
 Croton - Anthracnose, Bacterial leaf spot and blight
 Devils ivy - Bacterial leaf spot and blight, Rhizoctonia blight
 Dieffenbachia - Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight
 Dracaena - Bacterial leaf spot and blight, Botrytis blight, Leaf spot
 Dwarf Schefflera - Bacterial leaf spot and blight, Leaf spot
 Earthstar - Anthracnose
 English ivy - Anthracnose, Bacterial leaf spot and blight, Botrytis blight, Leaf spot, Rhizoctonia blight
 Euphorbia - Rhizoctonia blight
 Fishtail palm - Bacterial leaf spot and blight, Leaf spot
 Grape ivy - Anthracnose, Botrytis blight, Downy mildew, Powdery mildew, Rhizoctonia blight
 India-rubber tree - Leaf spot, Botrytis blight
 Japanese fatsia - Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight
 Ladyfinger palm - Leaf spot
 Lipstick vine - Botrytis blight, Leaf spot
 Nephthytis - Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight
 Nerve plant - Rhizoctonia blight
 Norfolk Island pine - Colletotrichum needle blight
 Oyster plant - Leaf spot
 Peperomia - Leaf spot, Rhizoctonia blight
 Philodendron - Anthracnose, Botrytis blight, Leaf spot
 Pothos - Bacterial leaf spot and blight, Rhizoctonia blight
 Prayer plant - Leaf spot
 Rattlesnake plant - Bacterial leaf spot and blight, Leaf spot
 Schefflera - Anthracnose, Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight
 Sedum - Leaf spot
 Snake plant - Bacterial leaf spot and blight, Leaf spot
 Spathe flower - Leaf spot, Rhizoctonia blight
 Staghorn fern - Bacterial leaf spot and blight, Rhizoctonia blight
 Swiss cheese plant - Bacterial leaf spot and blight, Anthracnose, Rhizoctonia blight, Soft rot
 Tailflower - Anthracnose, Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight, Soft rot
 Ti plant - Anthracnose, Leaf spot
 Urn plant - Anthracnose, Bacterial leaf spot and blight
 Various palms - Leaf spot
 Wax plant - Botrytis blight, Leaf spot, Rhizoctonia blight
 Weeping fig - Leaf spot
 Yucca - Leaf spot
 Zebra plant - Botrytis blight, Leaf spot, Rhizoctonia blight

NEU1140F RTU COPPER SOAP may cause some copper toxicity on some plant species. Before spraying a specific plant species, consult your State Experiment Station or make a test spray.

ROSE AND ORNAMENTAL SHRUBS**Blackspot, Downy mildew, Gray mold, Leafspots, Powdery mildew, Rust**

Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. Begin treatment when new spring growth emerges and repeat every 7 to 10 days for as long as needed to control disease. NEU1140F RTU COPPER SOAP may cause some copper toxicity on some roses. Copper toxicity appears as purple spots.

Optional wording that may or may not appear on the label:

- Fixed Copper is Suitable for Organic Gardening ← *delete this organic statement*
- Ideal for Roses, Fruits & Vegetables ← *delete this claim*
- For Ornamentals, Fruits & Vegetables
- Controls Powdery Mildew, Black Spot & Rust!
- Copper Soap Fungicide
- Manufactured under a license of Neudorff.
- For flowers, fruits and vegetables
- Use to control a wide range of plant diseases.
 - Powdery mildew
 - Rusts
 - Black spot
 - Leaf & fruit spot
 - Downy mildew
 - Fruit rot
 - Late blight
- For Use in Homes, Home Gardens and Home Greenhouses.
- For household use only
- NEU1140F RTU COPPER SOAP decomposes to form soluble copper, and fatty acid, both of which can be used by microbes and plants.
- Fixed copper is one of the oldest fungicides and bactericides, used to control a wide range of plant diseases. NEU1140F RTU COPPER SOAP is a patented, fixed copper fungicide, made by combining a soluble copper fertilizer with a naturally-occurring fatty acid. The copper and the fatty acid combine to form a copper salt of the fatty acid, known technically as a true soap. The copper soap fungicide controls many common diseases using low concentrations of copper, down as low as 90 ppm. The net result is an excellent vegetable, fruit and ornamental fungicide. NEU1140F RTU COPPER SOAP is suited for use in domestic circumstances, both indoors and outdoors. The National Organic Standards Board of the USA allows fixed copper to be used in organic crop production for controlling plant diseases. } *delete organic sentence*

A wide range of bacteria and fungi attack plants, however, they generally only cause a few types of diseases. When using NEU1140F RTU COPPER SOAP, it is important to identify the type of disease in order to use the best method of disease control.

- **Powdery mildews** tend to occur on the upper leaf surfaces, as though a white powder was sprinkled onto the plant. Powdery mildews can form a dense, white, cottony mass, making the whole leaf appear white. They are also commonly found on stems. Powdery mildews rarely kill plants. Most fungal diseases require water to infect plants. Powdery mildews are unique in that they do not require water for infection. Hence, under home greenhouse conditions, powdery mildews can become severe. Shade and dense plantings also promote powdery mildew.
 - **Downy mildews** tend to occur on the lower leaf surfaces. Downy mildews are much finer than powdery mildews, and appear as fine white cotton, similar to duck down. Downy mildews can rapidly kill plant leaves during wet, cool weather, but are inhibited by hot dry weather. White rust is caused by fungi related to the downy mildews and occurs as small white blisters, full of white powder, that appear on plant leaves. The white powder is rust spores.
 - **Leaf and fruit spots** are small brown or black spots on the leaf or fruit. They commonly occur on many of the plants grown around the home and in the garden. These spots can be caused by a range of fungi and bacteria. Leaf and fruit spots are commonly caused by fungi belonging to the following genera: *Alternaria*, *Cercospora*, *Colletotrichum*, *Cylindrosporium*, *Gloeosporium*, *Glomerella*, *Gnomonia*, *Marssonina*, *Mycosphaerella* (*Didymella*), *Phomopsis*, *Phyllosticta*, *Septoria*, and *Sphaceloma*. Spots on leaves and fruit can expand and grow together. Leaf spot pathogens require water to infect plants. During wet weather, spots can develop into a **blight**, rapidly, killing leaves, flowers and stems.
 - **Rusts** are small orange blisters that appear on plant leaves, that are full of orange powder. The orange powder is rust spores. Towards the end of the season, black spores are often produced.
 - **Rusts** occur as small white or orange blisters, full of white or orange powder, that appear on plant leaves.
 - **Fruit rots** appear as soft, rotten areas on the fruit. Often the causal fungus can be seen growing and producing spores on the surface of the rotting area. Rots are often caused by fungi belonging to the following genera: *Aspergillus*, *Botrytis*, *Monilinia*, *Mucor*, *Penicillium*, *Rhizopus* and *Sclerotinia*.
- NEU1140F RTU COPPER SOAP controls diseases of a wide range of plants, including many vegetables, fruit and ornamentals. As with most fungicides, NEU1140F RTU COPPER SOAP acts to protect plants from infection. Therefore, it is important to have NEU1140F RTU COPPER SOAP on the leaf, flower or fruit before the pathogen is able to cause an infection.
- Powdery mildews** commonly occur on the following plants: bean, beet, broccoli, brussel sprouts, cauliflower, cabbage, cantaloupe, chard, chicory, chive, cucumber, currant, endive, gooseberry, hop, kale, kohlrabi, lettuce, lilac,

pea, pumpkin, rose, rutabaga, spinach, squash, strawberry, turnip, zucchini and many other plant species.

-Downy mildews commonly occur on the following plants: bean, beet, broccoli, brussel sprouts, cauliflower, cabbage, cantaloupe, chard, chicory, chive, corn, cucumber, endive, garlic, hop, kale, kohlrabi, leek, lettuce, onion, pea, pumpkin, rutabaga, shallot, spinach, squash, sunflower, tobacco, turnip, zucchini and many other plant species.

-White rusts commonly occur on the following plants: broccoli, brussel sprouts, cauliflower, cabbage, chard, kale, kohlrabi, spinach, sunflower, turnip, and many other plant species.

-Leaf and fruit spots commonly occur on:

QUINCE: Anthracnose, Cedar Apple Rust, Coryneum Blight, Flyspeck, Quince Rust, Scab, Sooty Blotch

BEAN, PEA: Anthracnose, Ascochyta leaf and pod spot, Bacterial blights (halo, common and brown spot)

BEET, CHARD, SPINACH: Cercospora leaf spot

CARROTS: Alternaria leaf blight, Bacterial leaf blight, Cercospora leaf blight

CELERY AND CELERIAC: Bacterial leaf spot, Cercospora (early) blight, Septoria (late) blight

CORN: Southern leaf blight, Cercospora leaf spot

CABBAGE AND RELATED PLANTS: Alternaria blight, Bacterial leaf spot

CUCUMBERS, CANTALOUPE, SQUASH, PUMPKIN, ZUCCHINI: Alternaria blight, scab, Angular leaf spot, Anthracnose, Scab, Ulocladium leaf spot

CURRENT AND GOOSEBERRY: Anthracnose, Phyllosticta and Septoria leaf spots

GINSENG: Alternaria blight, Botrytis blight, Phytophthora mildew

HOP: Anthracnose, Cercospora leaf spot

LETTUCE, CHICORY, ENDIVE: Septoria leaf spot

ONION, GARLIC, LEEK, SHALLOT, CHIVES: Botrytis leaf blight, Neck rot and Bacterial soft rot

PARSLEY: Leaf scorch, Leaf spot

STRAWBERRY: Angular leaf spot, Leaf scorch, Mycosphaerella leaf spot, Phomopsis leaf blight, Septoria leaf spots

TOMATO, POTATO, EGGPLANT, PEPPER: Anthracnose, Bacterial speck, Bacterial spot, Cercospora leaf spot, Early blight, Gray mold, Late blight, Leaf mold, Septoria leaf spot

-Rusts are commonly found on roses, currants and many other types of plants.

-Fruit rots commonly occur on strawberries, raspberries, and other fruit.

-NEU1140f RTU COPPER SOAP may cause some copper toxicity on some plant species. On roses, copper toxicity appears as purple spots. **DO NOT** mix NEU1140F RTU COPPER SOAP with lime. Certain apple and Vinifera and French Hybrid grape varieties may be sensitive to copper sprays.

- Cultural Method to Assist in Reducing Plant Disease

Several common sense techniques can also be used to reduce plant disease. These include:

- Inspect the plants often for signs of disease or insect pests. Take appropriate measures when warranted.
- Promote healthy plant growth, but do not over fertilize.
- Do not grow the same types of plants in the same location in successive years.
- Control weed species around the garden that are related to the plant species that you are growing. Weeds are a source of plant pathogens.
- Space plants to ensure good airflow and drying after rain. Also, water plants in the morning to minimize the time that the plants are wet. Wet leaves, flowers and fruit promote infections by plant pathogens.
- Prune plants during dry weather to reduce wound infections.
- At the end of the growing season remove and compost all garden refuse. Garden refuse can act as a source of plant pathogens."

The registrant may use one of these optional statements, either:

"NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated on this label only when used in accordance with directions under normal use conditions. 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. Buyer assumes all risk of any such use. Seller makes no other warranties, either expressed or implied.

or

We guarantee your satisfaction or your money back.

or

Unconditionally guaranteed by W. Neudorff GmbH KG. If for any reason you are not satisfied with this product, send proof of purchase to the address shown and we will gladly refund your purchase price."

The registrant will use one of these statements, either:

Manufactured under a license of "W. Neudorff GmbH KG, Germany".

or

Sold under a license of "W. Neudorff GmbH KG, Germany".

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,
D-31860 Emmerthal, Germany

US Patent Number: 5,246,716