

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

FEB 2 5 2008

NOTIFICATION

Walter G. Talarek Authorized Agent for W. Neudorff GmbH KG c/o Walter G. Talarek, PC 1008 Riva Ridge Drive Great Falls, VA 22066-1620

SUBJECT: Applications for Pesticide Notification - Add Logo, Additional Container Size, and

Additional Emergency Phone #/Graphic/Optional Hose-end Sprayer Instructions

NEU1140F RTU Copper Soap

H02 Moss Killer Concentrate

Sulfur/Pyrethrins Fungicide/Insecticide

Bug-N-Sluggo Insect, Slug and Snail Bait

EPA Reg. No. 67702-17

EPA Reg. No. 67702-17

EPA Reg. No. 67702-24

Applications Dated November 19, 2007

NEU1140F Copper Soap EPA Reg. No. 67702- 2 NEU1128 RTU Copper Soap EPA Reg. No. 67702-13

Applications Dated November 21, 2007

H02 Moss Killer Concentrate EPA Reg. No. 67702-12

Application Dated December 13, 2007

#### Dear Mr. Talarek:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above products. The Registration Division (RD) has conducted a review of these requests for their applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The labels submitted with the applications have been stamped "Notification" and will be placed in our records. Please note: at the next printing of the subject labels, please include the phrase "To the extent consistent with applicable law," at the beginning of the "NOTICE TO BUYER (WARRANTY)" section.

If you have any questions, please contact me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

Linda Arrington

Notifications & Minor Formulations Team Leader

Rachel C. Halloman

Registration Division (7505P) Office of Pesticide Programs

Please read instructions on re		Form Appr	roved, OMB No	. 2070-0060	CALLET CONTRACT			
SEPA Environmental Protection Washington, DC 20460			•		_	tration dment	OPP Identifier Number	
Application for Pesticide - Section I								
1. Company/Product Number 67702-1 4. Company/Product (Name) NEU1140F RTU Co			2. EP	A Product Man ony Kish		_	Prosed Classification  None Restricted	
5. Name and Address of Applicant (Include ZIP Code)  W. Neudorff GmbH KG c/o Walter G. Talarek, PC 1008 Riva Ridge Drive Great Falls, VA 22066-1620  Check if this is a new address			6. Ex (b)(i) to: EPA	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.  FEB 2 5 2008  Product Name				
Section - II								
Amendment - Explain below.  Resubmission in response to Agency letter dated  X Notification - Explain below.				Final printed labels in response to Agency letter dated "Me Too" Application.  Other - Explain below.				
Explanation: Use edditions Garden Naturals 1 is consistent wit and no other chan of this product, make any false st consistent with t violation of FIFR 12 and 14 of FIFR 1. Material This Product Will I Child-Resistant Packaging Yes* No	ogo to the lah the provisiges have been I understand atement to EP he terms of P A and I may b	bel's optons of PR made to that it is A. I furth R Notice	ional cla Notice 9 the label s a viola her under 98-10 and	ims per P 8-10 and ing or the tion of 1 stand tha 40 CFR 1 cement ac	R Notice 9 EPA regula e confiden 8 U.S.C. S t if this 52.46, thi tion and p	8-10. The tions at tial states at the states	is notification 40 CFR 152.46, tement of formula to willfully tion is not t may be in	
* Certification must be submitted	Unit Packaging wgt.	container	Package wgt	containe	' [ _	Other (S	pecify)	
3. Location of Net Contents Information 4. Size(s) Retail Container 5. Location of Label Directions On Label On Label On Labeling accompanying product								
6. Manner in Which Label is Affixed to Product Lithograph 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.)								
1. Contact Point (Complete it	ems directly below for			De contacted,	if necessary, to	1		
Name Walter G. Talarek			Authorized Agent				Telephone No. (Include Area Code) 703-759-4837	
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 knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.  3. Title  Authorized Agent								
4. Typed Name Walter G. Talarek			. <b>Data</b> November 19	, 2007				

# **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 REG. NO. 67702-1 Net Contents:

EPA EST. 67702-WG-1

## **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 eyeCall a poison control center or doctor for treatment advice.				
IF ON SKIN OR CLOTHING					
IF SWALLOWED	-Call a poison control center or doctor immediately for treatment adviceHave person sip a glass of water if able to swallowDo not induce vomiting unless told to by a poison control center or doctorDo not give anything by mouth to an unconscious person.				
IF INHALED	-Move person to fresh airIf person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possibleCall 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					

or doctor or going for treatment.

## 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 this product in its original container and keep in a secure storage area out of reach of children and domestic animals. 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

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

If partly filled: Call your local solid waste agency or 1-800-CLEAN-UP for disposal instructions. Never place unused product down any indoor or outdoor drain.

## **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 m<sup>2</sup>)

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.

## **PEACHES**

#### Peach leaf curl

Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. Can be used to control peach leaf curl. Apply as a dormant spray in late fall during a period of dry weather.

#### **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:

- For Organic Production
- For Roses, Fruits & Vegetables
- 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
- -Roses & Ornamentals: Controls black spot, rust, powdery and downy mildew.
- -Fruit trees: Controls peach leaf curl, fruit rot, scab, blight, leaf and fruit spot
- -Vegetables: Controls powdery mildew, downy mildew, leaf spot, early and late blight.
- -Use as a dormant spray for peach leaf curl.
- -Controls peach leaf curl.
- -Controls powdery mildew
- -Use for early and late blight on tomatoes (and potatoes).
- -Controls many plant diseases using low concentrations of copper.
- -For a wide range of plant diseases: powdery mildew, rusts, blackspot, leaf & fruit spot, downy mildew, fruit rot, late blight.
- -Dormant and growing season liquid copper fungicide.
- Ready-to-Use
- OMRI Listed

## OMRI

 Listed by the Organic Materials Review Institute (OMRI) for use in organic production of food and fiber

- Listed by the Organic Materials Review Institute (OMRI) for use in organic production
- Made with Cueva<sup>TM</sup>, a trademark of W. Neudorff GmbH KG
   Contains Cueva<sup>TM</sup>, a trademark of W. Neudorff GmbH KG
- Cueva<sup>™</sup> is a trademark of W. Neudorff GmbH KG
- www.neudorff.de



- 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. 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.

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. 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, Marssonia,

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.
- 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
- CURRANT 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