



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 3, 2007

Mr. Walter G. Talarek, P.C.,
Agent for W. Neudorff GmbH KG
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

**Subject: Revised Labeling, NEU1161 RTU
EPA Registration No. 67702-6
Your Resubmission Dated July 20, 2007**

Dear Mr. Talarek:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

First Aid section comment(s), page 1 of 5:

1. Revise the last statement in the table to read as follows:

"Have the product container or label with you when calling a poison control center or doctor, or going for treatment. **For additional information on this pesticide product, you may call 1-800-xxx-xxxx or the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.**"¹

Precautionary Statements section, Use Restrictions subsection comment(s), page 2 of 5:

2. Insert the following text immediately following the existing 8th statement: "Do not apply more than 1 time per day."

Marketing Claims section comment(s) on Complete Label, page 5 of 5:

3. Delete the 26th text entry since it is identical to the 24th text entry on this same list.

W. Neudorff GmbH KG should note that a notice of availability of EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). As a result, additional data and/or labeling changes may be required for products containing pyrethrins.

¹ Please note that the "1-800-xxx-xxxx" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

A stamped copy of the label is attached for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. 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 amended labeling constitutes accepting of these conditions. If you have any questions about this label review, please contact Ann Sibold at (703) 305-6502 or via e-mail at

Sibold.Ann@epa.gov.

Sincerely yours,



Richard J. Gebken,
Product Manager (10)
Insecticide Branch,
Registration Division (7505P)

Attachment

067702-00006 D369964

NEU1161 RTU

| Active Ingredients | By Wt. |
|------------------------|---------|
| Pyrethrins | 0.01% |
| Canola Oil | 1.00% |
| Other Ingredients..... | 98.99% |
| Total | 100.00% |

3 8 7

**ACCEPTED
with COMMENTS
in EPA Letter Dated
August 3, 2007**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
67702-6

This product contains 0.0824 lbs. of canola oil and 0.0008 lbs. of pyrethrins per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

| FIRST AID |
|---|
| 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. |

NET CONTENTS: 16 fl. oz., 22 fl. oz., 24 fl. oz., 32 fl. oz, 1 gallon

EPA Registration #: 67702-6

EPA Establishment # 67702-WG-1

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Avoid contact with skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

User Safety Recommendations

- Users should wash hands with plenty of soap and water before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Environmental Hazards: This product is toxic to aquatic organisms including fish and invertebrates. Do not apply directly to water or near water. Drift and run-off may be hazardous to fish in water adjacent to treated areas. Do not contaminate water when disposing of equipment, washwater, or rinsate. See Directions for Use for additional precautions and requirements.

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

Only for use in home gardens, home indoor houseplants, and home greenhouses.

Read entire label. Use only as directed. Shake well before each use. Thoroughly wet all parts of the plants. Do not wet plants to point of runoff or drip. Repeat treatment in 1-2 weeks if needed. Do not apply more than 20 fl. oz. per 100 square feet per application. May be used on edible crops up to and including day of harvest.

USE RESTRICTIONS

Do not wet plants to point of runoff or drip.

Do not allow adults, children or pets to enter the treated area until sprays have dried.

Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.

Remove pets, birds, and cover fish aquariums before spraying.

Do not apply within 21 days of a sulfur application.

Do not use NEU1161 RTU spray when temperatures are above 90°F.

Do not apply more than 10 times per season.

Do not reapply within 3 days except under extreme pest pressure.

In case of extreme pest pressure do not reapply within 24 hours.

Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water treated areas(s) or apply prior to heavy rainfall.

Phytotoxicity:

Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

PESTS/SITES AND APPLICATION INSTRUCTIONS

[The registrant may use one of the two statements:

NEU1161 RTU will kill exposed aphids, beetles (Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle), caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers), ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants), mealybugs, mites, leafhoppers, scale, thrips, fungus gnats, whitefly, adelgids, plant bugs, sawfly larvae, psyllids, spittlebugs, and phylloxera.

OR

5 8 7

Kills exposed aphids, beetles (Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle), caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers), ants (except Fire Ants, harvester Ants, Carpenter Ants, and Pharaoh Ants), mealybugs, mites, leafhoppers, scale, thrips, fungus gnats, whitefly, adelgids, plant bugs, sawfly larvae, psyllids, spittlebugs, and phylloxera.]

OUTDOOR USE

For use outdoors on fruit and nut trees (apples, cherries, peaches, pears, nuts); flowering, foliage plants; corn; melons; tomatoes; vegetables (beans, cabbage, cucurbits, peas, potatoes); figs; small fruits (grapes, strawberry, raspberry); citrus; ornamental and shade trees (birch, evergreens, holly, oak).

HOME GREENHOUSE USE

For use in home greenhouses flowering, foliage plants; melons; tomatoes; vegetables (beans, cabbage, cucurbits, peas, potatoes); small fruits (grapes, strawberry, raspberry); houseplants.

INDOOR USE

For use indoors on houseplants.

DORMANT USE

Kills exposed egg stages of pests present in dormant season and scale insects, mites and mealybugs on dormant shrubs (roses), evergreens, fruit trees and shade trees. Thoroughly wet the dormant plants or trees.

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.

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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The registrant may use one of these optional statements:

"NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable 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. To the extent consistent with applicable law, the Seller shall not be liable for any such use.

To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied."

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."

OR

Satisfaction guaranteed

OR

Unconditionally guaranteed

OR

Money back guarantee

[Marketing claims and product information that may be presented on the container or label:

- Dormant and growing season insect spray to kill exposed adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, mites, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Patented formulation.
- Patented formula
- Patent #5,700,473.
- Kills all accessible stages of listed insects, including eggs.
- Contact insecticide, ovicide.
- Kills mites, whiteflies, aphids, and all accessible stages of listed insects & eggs
- Acts as a repellent (ovipositional and feeding deterrent).
- For roses, flowers & vegetables
- Contains pyrethrins and canola oil botanical insecticides.
- For use on plants-indoors and outdoors
- Can use on flowers, vegetables and roses
- Easy to use
- Insecticide/Miticide
- Insect spray
- Roses and flowers
- Houseplants and gardens
- Fruits and vegetables
- NEU1161 RTU is a contact killer for both listed insect and listed mite pests.
- Contact insecticide
- For best results, pests must be contacted directly with spray.
- Fast-acting

NEU1161 RTU LABEL

Page 5 of 5

- Kills listed insects fast
- Kills listed insects on contact
- Kills listed bugs on contact
- ~~- Kills listed insects on contact~~
- Read entire container label before using this product
- Easy to use
- May be used up to and including day of harvest.
- Pyrol™ is a trademark of W. Neudorff GmbH KG
- Made with Pyrol™ Insecticide, a trademark of W. Neudorff GmbH KG
- Contains Pyrol™ Insecticide, a trademark of W. Neudorff GmbH KG



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

[illegible]