

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 25 1999

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

Dear Mr. Talarek:

SUBJECT: Amendment to Add Claim Regarding Biodegradability and Revise First
 Aid Statements in Accordance with Agency Letter, Dated 2/8/99
 H01 Concentrate Herbicidal Soap
 EPA File Symbol: 67702-8
 Your Application Dated August 13, 1999

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided you make the following change:

1. Delete the front panel claim "H01 decomposes to form ammonia and fatty acids, both of which are used as nutrients by microbes and plants." Pursuant to the regulations at 40 CFR §156(a)(5), a pesticide product is considered "misbranded" if its labeling contains claims as to the safety of the pesticide, such as "safe", "nontoxic", "harmless", etc. or non-numerical and/or comparative statements on the safety of the product, such as "contains all natural ingredients", "among the least toxic chemicals known", "biodegradable", "pollution approved", etc. The statement referred to above ("H01 decomposes to form ... by microbes and plants") is considered such a safety claim and must, therefore, be deleted.

A stamped copy of the label is enclosed for your records. Submit one copy of your final printed labeling incorporating this change before you release the product for shipment.

The Agency has recently revised its recommended First Aid statements for pesticide products and intends to issue a PR Notice announcing the changes in the near future. In the interim we are encouraging registrants to begin using the new statements. The new statements were developed as part of the Consumer Labeling Initiative in close cooperation with poison control center personnel and other medical experts. While it is not mandatory that you revise your label at this time, you are strongly encouraged to substitute the revised statements (below) for those statements currently on the label at your next label printing:

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #11:S567015.let

CONCURRENCES							
SYMBOL ▶	7505C						
SURNAME ▶	S. Stanton						
DATE ▶	Aug 25, 1999						

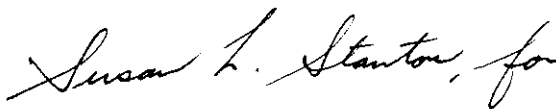
-2-

FIRST AID

If swallowed:	<ul style="list-style-type: none">• 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.
If in eyes:	<ul style="list-style-type: none">• 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:	<ul style="list-style-type: none">• 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 inhaled:	<ul style="list-style-type: none">• 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.

Sincerely yours,



Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

H01 CONCENTRATE HERBICIDAL SOAP**Active Ingredient:**

Ammoniated soap of fatty acids 22%

Inert Ingredients: 78%

Total: 100%ACCEPTED
with COMMENTS
In EPA Letter Dated

AUG 25 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.67702-P**ELIMINATES UNWANTED VEGETATION QUICKLY
WON'T STAIN BRICKS, CONCRETE OR ASPHALT
KILLS WITHIN HOURS****FAST ACTING****KILLS WEEDS, ALGAE AND MOSS****H01 DECOMPOSES TO FORM AMMONIA AND FATTY ACIDS, BOTH OF WHICH ARE USED
AS NUTRIENTS BY MICROBES AND PLANTS****KEEP OUT OF REACH OF CHILDREN****WARNING****STATEMENT OF PRACTICAL TREATMENT**

If In Eyes: Hold eyelids open and flush with gentle, steady stream of 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.

If Swallowed: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, eggwhites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

PRECAUTIONARY STATEMENTS - Household**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****WARNING:** Causes substantial but temporary eye injury. Causes skin irritation. Prolonged or frequent skin contact may cause allergic reactions in some individuals. Harmful if inhaled. Avoid breathing vapor or spray mist. Do not get in eyes, on skin or on clothing. Wear eye protection (goggles, face shield or safety glasses), long-sleeved shirt, long pants, socks shoes and rubber gloves. After this product is diluted in accordance with label directions, eye protection, gloves and long sleeves are not required. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.**PRECAUTIONARY STATEMENTS - Commercial/Agriculture****HAZARDS TO HUMANS AND DOMESTIC ANIMALS****WARNING:** Causes substantial but temporary eye injury. Causes skin irritation. Prolonged or frequent skin contact may cause allergic reactions in some

individuals. Avoid breathing vapor or spray mist. Harmful if inhaled. Do not get in eyes, on skin or on clothing.

Personal Protective Equipment (PPE) Requirements: Applicators and other handlers must wear: coveralls worn over short-sleeved shirt and short pants, socks, chemical-resistant footwear, waterproof gloves and protective eyewear. When cleaning equipment a chemical-resistant apron should also be worn.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

User Safety Recommendations

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS - Household

This product may be hazardous to aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

ENVIRONMENTAL HAZARDS - Commercial/Agriculture

This product may be hazardous to aquatic invertebrates. 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 when cleaning equipment or disposing of equipment washwaters.

DIRECTIONS FOR USE - Household

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

DIRECTIONS FOR USE - Commercial/Agriculture

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

Do not apply this product in a manner that will contact workers or other persons, either directly or through drift. Only protected workers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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

Agricultural Use Requirements

Use this product in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), restricted-entry interval, and notification to workers. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS).

Entry-Restrictions: Do not enter or allow worker entry into treated areas during the restricted-entry interval of 24 hours.

PPE required for early-entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, wear: coveralls worn over short-sleeved shirts and short pants, socks, chemical-resistant footwear, waterproof gloves and protective eyewear.

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the worker protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Keep unprotected persons out of treated areas until sprays have dried.

For early reentry to treated areas and that involves contact with anything that has been treated such as plants, soil, or water, wear: coveralls, shoes, socks, and waterproof gloves.

Application Directions - Household

Shake well before using.

Dilute the concentrate by mixing one part concentrate with 5 parts water.

To control small weeds without tap roots, apply diluted H01 at a rate of 5.8 fluid ounces/yd². For small weeds with tap roots or large weeds, apply H01 at a rate

of 8.3 fluid ounces/yd². Any standard hand-held or backpack sprayer can be used. Spray weeds thoroughly, using a coarse nozzle setting to reduce drift. For best control of individual weeds, spray the center of the plant. Plant damage will be visible from a few hours to 2 days after spraying. Repeat treatment every 2 to 3 weeks to control new weeds growing from seed and re-growth from biannual and perennial weeds. Thoroughly spray weeds with re-growth. Avoid spraying desirable plants.

H01 can be used at any time during the year. The best results are obtained with young, actively growing weeds, less than 5 inches high. H01 works best during warm and dry conditions. Application during cold weather may delay appearance of plant damage. If rain falls within 3 hours of treatment, an additional spray may be required.

Thoroughly wash equipment after use.

Use Sites:

Grapes, small fruits, tomatoes, vegetables (e.g., artichokes, beans, corn, ginseng, herbs, peas, peanuts, potatoes, sugarbeets, sunflowers, sweet potatoes and yams).

Ornamental herbaceous plants, ornamental lawns and turf, ornamental woody shrubs and vines and ornamental shade trees.

Around and on buildings, sidewalks, fences, bark mulch, driveways, patios and gravel.

Pests:

Weeds controlled or suppressed by H01 include the following:

chickweed	<i>Stellaria media</i>
corn spurry	<i>Spergula arvensis</i>
groundsel	<i>Senecio</i> spp.
lamb's-quarters	<i>Chenopodium album</i>
mouse-eared chickweed	<i>Cerastium vulgatum</i>
mustards	<i>Brassica</i> spp.
plantain	<i>Plantago</i> spp.
redroot pigweed	<i>Amaranthus retroflexus</i>
round leaved mallow	<i>Malva</i> spp.
sheep sorrel	<i>Rumex acetosella</i>
shepherd's-purse	<i>Capsella bursa-pastoris</i>
stinkweed	<i>Thlaspi arvense</i>

H01 is a fast-acting weed, algae and moss killer. It does not stain concrete, pavement, stucco or wood. H01 is a non-selective herbicide that controls many common annual weeds. H01 suppresses the growth of some bi-annual and

perennial weeds. It can be used in cultivated areas prior to planting grass, flowers and vegetables. Areas can be re-sown five days after treatment. It can also be used on weeds, algae or moss growing on or around buildings, sidewalks, fences, trees, bark mulch, driveways, patios and gravel. H01 can be used at any time during the year. Best results are obtained with young, actively growing weeds, less than five inches in size.

STORAGE AND DISPOSAL - Household

STORAGE: Store unused material, tightly closed, in original container only, away from open flame. Do not store at temperatures below 39°F.

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

Application Directions - Commercial/Agriculture

Shake well before using.

Dilute the concentrate by mixing one part concentrate with 5 parts water.

To control small weeds without tap roots, apply diluted H01 at a rate of 5.8 fluid ounces/yd². For small weeds with tap roots or large weeds, apply H01 at a rate of 8.3 fluid ounces/yd². Any standard hand-held or backpack sprayer can be used. Spray weeds thoroughly, using a coarse nozzle setting to reduce drift. For best control of individual weeds, spray the center of the plant. Plant damage will be visible from a few hours to 2 days after spraying. Repeat treatment every 2 to 3 weeks to control new weeds growing from seed and re-growth from biannual and perennial weeds. Thoroughly spray weeds with re-growth. Avoid spraying desirable plants.

H01 can be used at any time during the year. The best results are obtained with young, actively growing weeds, less than 5 inches high. H01 works best during warm and dry conditions. Application during cold weather may delay appearance of plant damage. If rain falls within 3 hours of treatment, an additional spray may be required.

Thoroughly wash equipment after use.

Use Sites:

Terrestrial Food and Feed Crops: Grapes, cereal grains, vegetable crops, orchards, field crops (e.g.: artichokes, beans, corn, cotton, ginseng, herbs, hops, peas, peanuts, potatoes, small fruits, sugarbeets, sunflowers, sweet potatoes, tobacco, tomatoes and yams) and grass or non-grass forage/fodder/hay.

Terrestrial Non-Food Crops: Ornamental herbaceous plants, ornamental lawns and turf, ornamental woody shrubs and vines and ornamental shade trees.

Terrestrial Non-Crop Sites: Around and on buildings, sidewalks, fences, bark mulch, driveways, patios and gravel.

Pests:

Weeds controlled or suppressed by H01 include the following:

chickweed	<i>Stellaria media</i>
corn spurry	<i>Spergula arvensis</i>
groundsel	<i>Senecio</i> spp.
lamb's-quarters	<i>Chenopodium album</i>
mouse-eared chickweed	<i>Cerastium vulgatum</i>
mustards	<i>Brassica</i> spp.
plantain	<i>Plantago</i> spp.
redroot pigweed	<i>Amaranthus retroflexus</i>
round leaved mallow	<i>Malva</i> spp.
sheep sorrel	<i>Rumex acetosella</i>
shepherd's-purse	<i>Capsella bursa-pastoris</i>
stinkweed	<i>Thlaspi arvense</i>

H01 is a fast-acting weed, algae and moss killer. It does not stain concrete, pavement, stucco or wood. H01 is a non-selective herbicide that controls many common annual weeds. H01 suppresses the growth of some bi-annual and perennial weeds. It can be used in cultivated areas prior to planting grass, flowers and vegetables. Areas can be re-sown five days after treatment. It can also be used on weeds, algae or moss growing on or around buildings, sidewalks, fences, trees, bark mulch, driveways, patios and gravel. H01 can be used at any time during the year. Best results are obtained with young, actively growing weeds, less than five inches in size.

STORAGE AND DISPOSAL - Commercial/Agriculture

Do not contaminate water, food or feed by storage or 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 39°F. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

9 of 9

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.

Buyer assumes all responsibility for safety and use not in accordance with directions.

Registrant: W. Neudorff GmbH KG, 1008 Riva Ridge Drive, Great Falls, VA
22066-1620

US Patent Number:
EPA Reg. No. 67702-8

EPA Est. No. 67702-WG-1

NET CONTENTS