

67702-11

7/8/2003

Page 1815



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

JUL 8 2003

Subject: EPA Reg. NO.:67702-11
NEU 1128
In Response to PR Notices 2001-1, 2001-6 and other Label Corrections
Submission Dated July 7, 2003

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.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment.

If you have any questions or comments about this letter, please contact Stephanie Nguyen at 703-605-0702.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D.C. Kenny".

Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

2 7 15

NEU1128

Active Ingredient	By Wt.
Potassium Salts of Fatty Acids	47%
Other Ingredients.....	53%
Total.....	100%

Contains 4.07 lb Technical per Gallon

KEEP OUT OF REACH OF CHILDREN

WARNING AVISO

[COMMERCIAL/AGRICULTURE USE]

Si usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

ACCEPTED
 JUL 8 2003
 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 67702-11

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
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 eye. Call a poison control center or doctor for treatment advice.
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.

NET CONTENTS 1 gallon, 2 ½ gallons, 5 gallons, 20 gallons, 30 gallons and 55 gallons

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: WARNING. Causes substantial but temporary eye injury. Causes skin irritation. Do not get in eyes, on skin or on clothing. Wear protective eye gear (goggles, face shield, or safety

glasses). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

Personal Protective Equipment (PPE) Requirements:

Handlers who may be exposed to the concentrate through mixing, loading, application, and other tasks must wear:

- protective eyewear;
- coveralls worn over short-sleeved shirt and short pants;
- chemical-resistant footwear and socks;
- chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride and vitron;
- chemical resistant headgear for overhead exposure; and
- chemical-resistant apron when cleaning equipment, mixing or loading.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. When mixing and loading wear a chemical resistant apron. When cleaning equipment add a chemical resistant apron. Follow the 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.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- 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: This product may be hazardous to aquatic invertebrates. Do not apply directly to water, 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 equipment washwaters.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

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: (1) Plastic containers – Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, but burning. If burned, stay out of smoke. (2) Metal Containers – Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

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 way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Agricultural Use Requirements

Use this product only 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.

Do not enter or allow worker entry into treated area during the restricted-entry interval of 12 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, is: coveralls over short-sleeved shirt and short pants; chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride and vitron, chemical-resistant footwear and socks; protective eyewear; and chemical-resistant headgear for overhead exposure.

Non-Agricultural Use Requirements

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

DIRECTIONS FOR MIXING

For 2% formulation, mix 2 gal of product/100 gal of water (4.07 lb Tech/gal). Add sufficient water to the mixing tank to allow proper agitation by pump or paddles. Continue stirring while adding first the NEU1128 then the remaining water.

Hard water in excess of 300 ppm should be conditioned to reduce its hardness prior to mixing with NEU1128.

TANK MIXING

NEU1128 may be combined with other pesticides to broaden the target spectrum, improve the level of kill, provide residual kill and enhance coverage. When used as a tank-mix, observe all directions for use, crops, use rates, dilution ratios, precautions, and limitations, which appear on the tank mix product label. Follow the label directions for the most restrictive of label precautions and limitations. This product should not be mixed with any product, which prohibits such mixing. Tank mixtures are permitted only in those states where the tank mix partner is registered. For tank mixing with companion pesticides, NEU1128 should be used at a rate of 1% formulation (1 gallon of concentrate to 100 gallons of water). For example, certain caterpillars and leaf feeding beetles (e.g. Elm leaf beetle) can be controlled with tank mixes of 1 gallon of NEU1128 per 100 gallons of water plus a standard pesticide.

Order of Tank Mixing:

- water
- water conditioner (if needed)
- conventional pesticide - add other products in the following order: water-soluble bags, wettable powders, dry flowables, liquid flowables, ECs, and soluble materials such as fertilizers.
- NEU1128

Also, if appropriate, give a Tank Mix Compatibility Test: Using a 2 quart jar, add the proportionate amounts of the products (in the order recommended above) to 1 qt water. After thorough mixing, let it stand for 5 minutes. If

6 7 15

the combination remains mixed or can be re-mixed readily, it is compatible. Once compatibility is proven, use the same procedure for adding required products to the spray tank.

Manzate and dithane products are incompatible with NEU1128.

Combining this product with sulfur or applying this product within 3 days of sulfur application may increase the plant damage caused by sulfur on sensitive plants (e.g., grape). Do not tank mix NEU1128 with sulfur when temperatures are higher than 90°F.

Do not allow tank mixes to sit for long periods. Mix and spray as soon as possible.

NEU1128 alone only requires stirring prior to use. Tank mixes of NEU1128 with other pesticides should continue to be stirred throughout use. If using equipment without pump or paddle, shake often during use. Flush fluid in sprayer hose lines back into the tank if stirring is interrupted.

APPLICATION INSTRUCTIONS

For field applications apply 2% formulation, 2 gal of product/100 gal of water (4.07 lb Tech/gal), at a rate of 75 to 200 gal/acre (6.10 to 16.26 lbs ai/acre) using ground spray equipment. For best results commence treatment when infestation is first noticed. Thoroughly spray insect pests on plants with diluted product to wetting. Minimize run-off to reduce plant injury on sensitive plants. NEU1128 is a contact spray and is effective in its liquid state. Pests need to be contacted with spray solution to be effective. Efforts should be made to thoroughly reach all plant parts including undersides of leaves.

Repeat treatment every one to two weeks as needed. Apply to a maximum of three consecutive applications to ensure plant injury does not occur. Additional applications may be possible if previous experience with repeat applications of the product under the same conditions have not produced plant injury.

May be used on edible crops up to and including day of harvest after a minimum spray interval of 12 hours.

PESTS/SITES

NEU1128 will control insect pests such as: adelgids (woolly aphids), aphids, lacebugs, mealybugs, mites, leafhoppers, scale insects, plant bugs, sawfly

larvae (e.g. pear and rose slugs), psyllids, tent caterpillars, spider mites, earwigs and whitefly.

Crop	Pest
Fruit trees such as: apples, apricots, cherries, nectarines, peaches, pears, plums, and prunes Nut trees such as: pecans and almonds	aphids, mites, plant bugs, leafhoppers, earwigs, mealybugs, psyllids, sawfly larvae (pear slugs), scale insects, spider mites, tent caterpillars
Citrus	aphids, mealybugs, mites, scale insects
Olives	aphids, scale insects, spider mites

Additional recommendations for this use:

- For tent caterpillars apply at a rate of 3% formulation (3 gal of product/100 gal of water) directly on larvae.
- Do not exceed a maximum spray volume of 400 gal/acre on apples.
- Use with care on pears after delayed dormant stage due to potential for fruit marking.
- Do not exceed a maximum rate of 100 gal/acre on smooth skinned stone fruit up to fruit formation.
- Do not exceed a maximum rate of 175 gal/acre on peaches.
- Do not use on yellow skinned nectarines.
- If sooty mold is present on citrus, application of product may result in fruit marking.

Crop	Pest
Small fruits (grapes, strawberry, blueberry, raspberry, cranberry)	aphids, mealybugs, mites, scale insects, leafhoppers, plant bugs

Additional recommendations for this use:

- Do not use on table grapes once they become 6-7 mm in diameter (removes waxy bloom) or use at lowest recommended rate (75 gal/acre).

Crop	Pest
Ornamental and shade trees (flower and	aphids, lacebugs, mealybugs,

foliage plants, birch, flowering cherry, dogwood, evergreens, hawthorn, holly, magnolia, maple, oak, flowering peach, privet, pyracantha, sycamores)	mites, plant bugs, psyllids, sawfly larvae, leafhoppers, spider mites, whiteflies, woolly aphids (adelgids), tent caterpillars
Flowering, foliage, bedding plants and houseplants – greenhouse and outdoors	aphids, lacebugs, mites, scale insects, spider mites, leafhoppers, whiteflies, sawfly larvae (rose slugs), earwigs

Additional recommendations for this use:

- For tent caterpillars apply at a rate of 3% formulation (3 gal of product/100 gal of water) directly on larvae.
- For Cooley spruce gall adelgids apply at a rate of 4% formulation (4 gal of product/100 gal of water). Test for tree sensitivity before applying at this rate. Applications in early spring before bud break or in the fall on hardened off foliage is recommended.

Crop	Pest
Alfalfa, canola, cotton, peanuts, soybeans, tobacco, wheat	aphids, fleahoppers, mites, plant bugs, whiteflies
Corn (field, sweet)	aphids
Sugar beets	mites, aphids
Vegetables - field and greenhouse (e.g. asparagus, beans, beets, broccoli, Brussel sprouts, cabbage, cauliflower, celery, collards, corn, cucurbits, eggplant, herbs and spices, kale, lettuce, lima beans, melon, mustard greens, peas, potatoes, peppers, radishes, spinach, squash, tomatoes, turnips)	aphids, mites, plant bugs, whiteflies
Hops, banana, pineapple	aphids, leafhoppers, mealybugs, spider mites, plant bugs, scale insects and whiteflies.

Additional recommendations for this use:

- To control green peach aphid, tank mixing with another pesticide is necessary.
- When applications are made in less than 25 gallons of water per acre, use 2 quarts of product per acre.

USE RESTRICTIONS

Do not spray when plants are under stress. Do not apply to new seedlings and transplants without determining sensitivity (phytotoxicity) first. Avoid spraying during full sun. Spray early in morning or evening or when overcast. Do not apply to evergreens during drought and use caution when tender new foliage is present. If concerned about sensitivity of plants, apply to individual plants or small areas and wait a couple days to determine if plant damage occurs prior to treatment of larger areas.

Do not use on sweet peas, nasturtiums, delicate ferns or Calmeria and Italia varieties of grapes.

Use with care when used on azaleas, bleeding heart, camelia, corn, euphorbia, fuchsia, gardenia, geraniums, impatiens, hawthorn, horse chestnut, jade plant, Japanese maple, lantana, mountain ash, ornamental ivy, palms, succulents. Sensitivity varies with plant varieties. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait to determine if plant damage (phytotoxicity) occurs before treating larger areas.

Use with care on blooms. Determine sensitivity before spraying.

Poinsettias may be sensitive. Do not apply after coloring of bracts has begun.

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.

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

- Insecticidal soap
- Insecticide/Miticide
- Insect spray
- May be used up to day of harvest
- Can be used right up until day of harvest
- Does not persist in the environment.
- Contact insecticide.

10 7 15

- For use on vegetables, fruit and nut trees, citrus, berries, ornamentals, shrubs, flowers, and trees in homes, gardens and greenhouses.
 - Can be used in vegetable gardens.
 - Patented technology
 - Unique, patented formula.
 - Read Entire Container Label Before Using This Product.
 - CONTROLS: Adelgids, aphids, earwigs, grasshoppers, lacebugs, mealybugs, mites, plant bugs, leafhoppers, psyllids, sawfly larvae, scale insects, tent caterpillars, thrips, whitefly, woolly aphids and other listed pests.
 - Satisfaction guaranteed or your money back
 - Unconditionally guaranteed or your money back
 - Easy to Use
 - Insecticide/Miticide
 - Ideal as part of an Integrated Pest Management System
 - Compatible with Biological Control Agents, Beneficial Insects and Mites
- General Information:** NEU1128 can be used to treat plants prior to biological control agent release and to treat "hot spots" for pest control in greenhouses with subsequent release of beneficial mites and insects.
- Mode of Action:** NEU1128 is a contact killer for both insect and mite pests. It penetrates the body of pests and results in rapid death. NEU1128 kills pests by disrupting membrane and cellular function.
- NEU1128 contains specially selected fatty acid salts (soaps) chosen for effective pest control. NEU1128 has been formulated to provide optimum spreading.
- NEU1128 is effective against the adult, larval and nymph stages of pests. Pupal stages of some pests (e.g. whitefly) may also be affected.
- www.neudorff.de



- Neudosan™ is a trademark of W. Neudorff GmbH KG
- Made with Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG
- Contains Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG]

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

For information on NEU1128, call 250-656-5555, Monday through Friday, 9 am to 5 pm PST.

NEU1128 LABEL
10/14

11 8 15

EPA Reg. No. 67702-11

EPA Est. No. 67702-WG-1

Patent #: 5,631,290

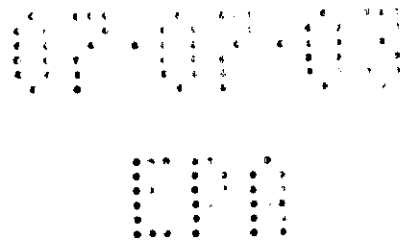
07-07-00

07

12 3 15

NEU1128

Active Ingredient	By Wt.
Potassium Salts of Fatty Acids	47%
Other Ingredients.....	53%
Total.....	100%



KEEP OUT OF REACH OF CHILDREN

WARNING

[HOUSEHOLD USE]

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
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 eye. Call a poison control center or doctor for treatment advice.
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.

NET CONTENTS 8 oz, 16 oz, 1 qt. ½ gallon, 1 gallon

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: WARNING. Causes substantial but temporary eye injury. Causes skin irritation. Do not get in eyes, skin or on clothing. Wear protective eye gear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

Environmental Hazards: This product may be hazardous to aquatic invertebrates. Do not apply directly to water, 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 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.

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.

Please read entire label before using. Use only as directed. May be used on edible crops up to and including day of harvest after a minimum spray interval of 12 hours.

DIRECTIONS FOR MIXING

For 2% formulation mix 4 teaspoons of concentrate with 1 quart of water (or 2 oz. concentrate with 3 quarts of water). Shake well before use.

CONVERSIONS	
1 fluid ounce	6 teaspoons
1 pint	16 fluid ounces
1 quart	2 pints (32 fl. oz.)
1 gallon	4 quarts (128 fl. oz.)

PESTS/SITES AND APPLICATION INSTRUCTIONS

NEU1128 will control insect pests such as: adelgids (woolly aphids), aphids, lacebugs, mealybugs, mites, grasshoppers, leafhoppers, scale insects, plant bugs, sawfly larvae (pear and rose slugs), psyllids, tent caterpillars, thrips, spider mites, earwigs and whitefly.

Apply a 2% diluted product using hand-held trigger sprayers, hand sprayers or backpack sprayers. Thoroughly spray insect pests on plants to wetting with diluted product. Repeat treatment weekly or bi-weekly if needed. NEU1128 is a contact spray and is effective in its liquid state. Efforts should be made to thoroughly reach all plant parts including undersides of leaves.

For use indoors, outdoors and in greenhouses on fruit and nut trees (e.g., apples, cherries, peaches, pears, pecans, almonds); corn; soybeans; melons;

tomatoes; vegetables (e.g., beans, cabbage, cucurbits, peas, potatoes); figs; small fruits (e.g., grapes, strawberry, raspberry); citrus; houseplants, flowering, foliage and bedding plants; ornamental and shade trees (e.g., birch, evergreens, holly, oak).

USE RESTRICTIONS

Do not use on sweet peas, nasturtiums, delicate ferns.

Do not spray when plants are under stress. Use with care on new seedlings, transplants and blooms. Avoid spraying during full sun. Spray early in morning or evening or when overcast. Soap spray may cause marking of some varieties. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait to determine if plant damage (phytotoxicity) occurs prior to treatment of larger areas.

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.

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

- Insecticidal soap
- Insecticide/Miticide
- Insect spray
- May be used up to day of harvest
- Can be used right up until day of harvest
- Does not persist in the environment.
- Contact insecticide.
- For use on vegetables, fruit and nut trees, citrus, berries, ornamentals, shrubs, flowers, and trees in homes, gardens and greenhouses.
- Can be used in vegetable gardens.
- Patented technology
- Unique, patented formula.
- Read Entire Container Label Before Using This Product.
- CONTROLS: Adelgids, aphids, earwigs, grasshoppers, lacebugs, mealybugs, mites, plant bugs, leafhoppers, psyllids, sawfly larvae, scale insects, tent caterpillars, thrips, whitefly, woolly aphids and other listed pests.
- Satisfaction guaranteed or your money back

- Unconditionally guaranteed or your money back
- Easy to Use
- Insecticide/Miticide
- Ideal as part of an Integrated Pest Management System
- Compatible with Biological Control Agents, Beneficial Insects and Mites
- General Information:** NEU1128 can be used to treat plants prior to biological control agent release and to treat "hot spots" for pest control in greenhouses with subsequent release of beneficial mites and insects.
- Mode of Action:** NEU1128 is a contact killer for both insect and mite pests. It penetrates the body of pests and results in rapid death. NEU1128 kills pests by disrupting membrane and cellular function.
- NEU1128 contains specially selected fatty acid salts (soaps) chosen for effective pest control. NEU1128 has been formulated to provide optimum spreading.
- NEU1128 is effective against the adult, larval and nymph stages of pests. Pupal stages of some pests (e.g. whitefly) may also be affected.
- May be applied to edibles up to day of harvest.
- Money back guarantee
- Multi-purpose
- Insect Killer
- www.neudorff.de



- Neudosan™ is a trademark of W. Neudorff GmbH KG
- Made with Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG
- Contains Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG
- For use indoors-outdoors
- Houseplants, Flowers, Fruits, Vegetables, Trees, Shrubs]

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

For information on NEU1128, call 250-656-5555, Monday through Friday, 9 am to 5 pm PST.

EPA Reg. No. 67702-11

EPA Est. No. 67702-WG-1

Patent #: 5,631,290