

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



DEC 17 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

W.Neudorff GmbH KG
C/O Walter Talarek
Law Offices of Walter G. Talarek, P.C.
1008 Riva Ridge Drive
Great Falls, VA 22066

Dear Mr. Talarek:

Subject: Amendment of label add new size directions and optional marketing claims
NEU1128 RTU
EPA Registration No. 67702-13
Your Submissions Dated 10/8/08

The labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide, as amended are acceptable.

A stamped copy of the labeling is enclosed for your records. Please submit one final printed copy of the labeling before releasing the product for shipment. If you have any questions regarding this label, please contact Autumn Metzger at (703) 305-5314.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Hebert", with a long, sweeping horizontal line extending to the right.

John D. Hebert
Product Manager 7
Insecticide-Rodenticide Branch
Registration Division (7505P)

NEU1128 RTU

ACCEPTED

DEC 17 2008

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

Active Ingredient	By Wt.
Potassium Salts of Fatty Acids.....	1%
Other Ingredients	99%
Total.....	100%

EPA. Reg. No: 67702-13

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS: 8 oz, 16 oz, 24 oz, 32 oz, 1 qt, 8 oz (40 oz), 1 gallon

Registration #: 67702-13

Establishment #: 67702-DEU-1

PRECAUTIONARY STATEMENTS

Environmental Hazards: This product may be hazardous to aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather or when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area.

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.

[Directions for use and storage and disposal section for containers with standard trigger sprayer]

Shake container before use. NEU1128 RTU is a contact spray and pests must be sprayed directly to achieve control. Thoroughly spray insect pests to wetting on all plant parts, including undersides of leaves. Repeat treatment weekly or bi-weekly if needed. May be used on edible crops up to and including day of harvest.

Do not use on sweet peas, nasturtiums, delicate ferns. Use with care on new seedlings, transplants and blooms. Avoid spraying during full sun. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait to determine if plant damage occurs prior to treatment of larger areas.

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

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

BATCH CODE

[Directions for use and storage and disposal section only for 32 oz. containers with refillable trigger sprayer]

[SPRAYER INSTRUCTIONS:

How to prime and care for your sprayer:

1. After shaking product well, remove cap from container and replace with sprayer hose and cap assembly. Tighten securely.
2. Turn sprayer nozzle one half turn counter-clockwise. Hold sprayer below the level of container and prime by pumping trigger 10-15 times until product is dispensed. Adjust nozzle to fine spray or jet stream as needed.
3. To store, turn nozzle to "OFF" position and store with sprayer above level of liquid in container to prevent leakage.]

TO OPERATE: SHAKE BEFORE USING. Turn nozzle to "spray" or "stream" position before using. Hold pump sprayer 18 to 24 inches from foliage or surfaces being treated. NEU1128 RTU is a contact spray and pests must be sprayed directly to achieve control. Thoroughly spray insect pests to wetting on all plant parts, including undersides of leaves. Repeat treatment weekly or bi-weekly if needed. May be used on edible crops up to and including day of harvest.

REFILLING

[This bottle][NEU1128 RTU] can be refilled by using a 0.64 oz. refill bottle of NEU1128, as follows. To refill remove existing cap from top of [bottle][trigger]. Fill bottle [with 31.4 fl oz of tap water][to refill line (31.4 fl oz) with tap water]. Place [refill cap][refill cartridge][refill cartridge/cap] of NEU1128 on top of bottle and turn clockwise to secure cap and release refill concentrate into bottle. Shake vigorously for 15-30 seconds to mix bottle contents prior to reusing. Remove [Refill cap][Refill Cartridge] and discard. Replace original cap prior to product application. Use diluted product within three months.

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:

NEU1128 RTU

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If empty: Nonrefillable container. Do not reuse or refill this container unless the directions for use allow a different (concentrated) product to be diluted in the container. Place in trash or offer for recycling if available.

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

BATCH CODE

[Directions for use and storage and disposal section only for 32 oz. containers with Power Pump Sprayer]

TO OPERATE: SHAKE BEFORE USING. [Remove shrink wrap from package and discard] [Turn nozzle to "spray" position before using.] [Break off the pump "TAB" with your thumb [Optional Graphic]. Pump 10-15 times to build up pressure. The Power Pump bottle may bulge slightly as it is pressurized. Never pressurize by any means other than the pump included. You may need to pump during use to maintain a proper spray. Hold pump sprayer 18 to 24 inches from foliage or surfaces being treated. Pull trigger once and hold to dispense product [No need to keep pulling trigger]. NEU1128 RTU is a contact spray and pests must be sprayed directly to achieve control. Thoroughly spray insect pests to wetting on all plant parts, including undersides of leaves. [When spraying is complete release pressure in bottle by pressing Pressure Release Valve [graphic]]. Repeat treatment weekly or bi-weekly if needed. May be used on edible crops up to and including day of harvest.

Do not use on sweet peas, nasturtiums, delicate ferns. Use with care on new seedlings, transplants and blooms. Avoid spraying during full sun. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait to determine if plant damage occurs prior to treatment of larger areas.

REFILLING

[The Power Pump][This package][NEU1128 RTU] can be refilled by using a 0.64 oz. refill bottle of NEU1128, as follows. To refill remove existing cap from top of [bottle][trigger]. Fill bottle [with 31.4 fl oz of tap water][to refill line (31.4 fl oz) with tap water]. Place [refill cap][refill cartridge][refill cartridge/cap] of NEU1128 on top of bottle and turn clockwise to secure cap and release refill concentrate into bottle. Shake vigorously for 15-30 seconds to mix bottle contents prior to reusing. Remove [Refill cap][Refill Cartridge] and discard. Replace original cap prior to product application. Use diluted product within three months.

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. Always release pressure by [pressing][pulling] pressure relief valve prior to storing. Do not store or transport under 32°F

DISPOSAL:

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

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

BATCH CODE**PESTS**

NEU1128 RTU 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.

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; ornamental and bedding plants; ornamental and shade trees (e.g., birch, evergreens, holly, oak).

NOTICE TO BUYER

To the extent consistent with applicable law, 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. To the extent consistent with applicable law, 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
- roses and flowers
- houseplants and gardens
- fruits and vegetables
- rose and flower insecticide
- ideal for roses
- ideal for houseplants
- kills insects in minutes

- kills insects fast
- fast acting
- kills bugs on contact
- kills insects on contact
- provides quick control of pests
- indoor – outdoor
- may be used up to day of harvest
- can be used right up until day of harvest
- May be applied to edibles up to day of harvest
- Does not persist in the environment.
- Contact insecticide.
- NEU1128 RTU is a contact spray and pests must be sprayed directly to achieve control.
- 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.
- Read Entire Container Label Before Using This Product.



- For Organic Gardening
- 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.
- KILLS: 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.
- KILLS spider mites, aphids, mealybugs and whitefly.
- Satisfaction Guaranteed or your money back.
- Money back guarantee
- Easy to Use
- Ready-to-Use
- Ideal as part of an Integrated Pest Management System
- Compatible with Biological Control Agents, Beneficial Insects and Mites
- Do not spray when plants are under stress.
- NEU1128 RTU 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.
- NEU1128 RTU is a contact killer for both insect and mite pests.
- NEU1128 RTU penetrates the body of pests and results in rapid death. It kills pests by disrupting membrane and cellular function.
- NEU1128 RTU contains specially selected soaps (fatty acid salts) chosen for effective pest control.
- NEU1128 RTU has been formulated to provide optimum spreading.
- NEU1128 RTU is effective against the adult, larval and nymph stages of pests. Pupal stages of some pests (e.g. whitefly) may also be affected.
- Multi-purpose
- Insect killer
- www.neudorff.com



- 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
- Houseplants, Flowers, Fruits, Vegetables, Trees, Shrubs
- For use indoors-outdoors



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



[Optional Statements for Use with Refillable Trigger Sprayer:

- Refillable
- Reduces plastic [packaging] in landfills
- [Save money] with refill cartridges

Optional Statements for Use with Power Pump Sprayer:

- Refillable
- Power Pump Pressure Sprayer
- Reduces plastic [packaging] in landfills
- [Save money] with refill cartridges
- reduces hand fatigue [compared to trigger sprayer]
- NEU1128 RTU utilizes the Power Pump packaging eliminating the need to squeeze a trigger sprayer over and over again. Just pump it a few times and spray. And the Power Pump can be refilled up to [10][15] times with NEU1128.]]

Registrant: W. Neudorff GmbH KG
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