



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

January 31, 2018

Mr. Walter G. Talarek, Agent  
W. Neudorff GmbH KG  
c/o Walter G. Talarek, PC  
5153 Allison Marshall Drive  
Warrenton, VA 20187-8980

Subject: Label and CSF Amendment – Adding Container Sizes and Revising Marketing on Label; Revising Basic CSF and Alternate CSF 1, Adding Alternate CSF 2  
Product Name: NEU1128 RTU  
EPA Registration Number: 67702-13  
Application Date: December 6, 2017  
Decision Number: 536822

Dear Mr. Talarek:

The amended label and CSFs referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 12/6/2017
- Alternate CSF 1 dated 12/6/2017
- Alternate CSF 2 dated 12/6/2017

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition,

regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Matthew Sellner by phone at (703) 347-8034, or via email at [sellner.matthew@epa.gov](mailto:sellner.matthew@epa.gov).

Sincerely,

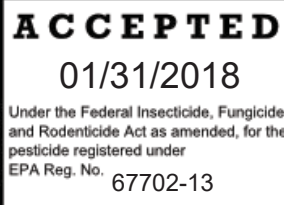


Michael Walsh  
Product Manager 11  
Invertebrate & Vertebrate Branch 2  
Registration Division  
Office of Pesticide Programs

Attachment

# NEU1128 RTU

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



**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

NET CONTENTS: 8 oz, 12 oz, 16 oz, 24 oz, 32 oz, 1 qt, 8 oz (40 oz), 64oz, 1 gallon, 1.33 gallons

EPA Reg. No. 67702-13

EPA Est. No.

### 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 or powdery mildew 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**

**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 AND CONTAINER HANDLING:**

**If empty:** Nonrefillable. Do not reuse or refill this 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 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**

**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 AND CONTAINER HANDLING:**

**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. NOTE: 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 or powdery mildew 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**

**PESTICIDE 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

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:**

**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**

**PESTS**

NEU1128 RTU will control powdery mildew and listed 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. To the extent consistent with applicable law, 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
- [Insecticidal]/[Fungicidal]/[Miticidal] soap
- 3 in 1: Insecticide/miticide/fungicide
- [Insecticide]/[Miticide]/[Fungicide]
- Insect spray
- roses and flowers
- houseplants and gardens
- fruits and vegetables

## NEU1128 RTU

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- rose and flower insecticide
- ideal for roses
- ideal for houseplants
- kills insects in minutes
- kills insects fast- in minutes!
- fast acting- in minutes!
- kills bugs through contact
- kills insects through contact
- provides quick control of pests in minutes
- 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), (powdery mildew) 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), (powdery mildew) and other listed pests
- 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

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**-Mode of Action:** NEU1128 RTU is a contact killer for (insects), (mites), and (powdery mildew).

-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

-Insect and powdery mildew (disease) spray

-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 growing organic food and fiber.

-Listed by the Organic Materials Review Institute (OMRI) for use in organic gardening.

-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

- Kill listed insects through contact (in minutes)

-Controls powdery mildew, insects and mites

- Specially-formulated pesticidal soap to protect plants

- People and pets can enter the area after product is dried

- Controls powdery mildew

- Spray and harvest the same day

-[Save money] with refill cartridges

-reduces hand fatigue [compared to trigger sprayer]



NEU1128 RTU

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-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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31860 Emmerthal, Germany