

NOV 23 2005

W. Neudorff GmbH KG
c/o Mr. Walter Talerek
1008 Riva Ridge Dr.
Great Falls, VA 22066

Subject: AEROSOL NEU1161 PEST SPRAY
EPA Registration No. 67702-16
Application dated November 4, 2005

Dear Mr. Talarek:

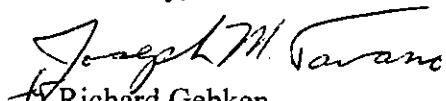
The proposed amendment to the registration of the product cited above under the Federal Insecticide, Fungicide And Rodenticide Act, as amended is acceptable subject to the comments listed below:

- 1) Delete the statement, "Does not contain piperonyl butoxide[butyl-carbityl (6-propylpiperonyl) ether]."
- 2) Delete the statement, "Does not contain PBO."

A stamped copy of the draft label is enclosed for your records. Submit two copies of the corrected finished printed label before this product is released for shipment under this revised label.

If you have any questions please contact Joseph Tavano at (703) 305-6411.

Sincerely,


Richard Gebken
Acting Product Manager 10
Insecticide Branch
Registration Division(7505C)



AEROSOL NEU1161 PEST SPRAY

Active Ingredients	By Wt.
Pyrethrins	0.30%
Canola Oil.....	1.00%
Inert Ingredients.....	98.70%
Total	100.00%

ACCEPTED
With Comments
NOV 23 2005
 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under BPA Reg. No. **67702-16**

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID
<p>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.</p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>

NET CONTENTS: fluid ounces
 EPA REG. NO.: 67702-16 EPA EST. 67702-WG-1 Patent#: 5, 700, 473

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

Environmental Hazards: Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

Physical or Chemical Hazards: Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperature above 130°F may cause bursting.

STORAGE AND DISPOSAL OF AEROSOL PRODUCT
<p>STORAGE: Protect from freezing. If frozen, thaw and shake well. Store in a cool, dry place (preferably locked) inaccessible to children and pets, and away from heat, open flame or other sources of ignition.</p> <p>DISPOSAL: Do Not Puncture or Incinerate! If empty: Place in trash or offer for recycling if available. If partly filled: Call your local waste agency or 1-800-CLEAN-UP for disposal instructions.</p>

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. Use only as directed. Shake well before each use.

PESTS/SITES AND APPLICATION INSTRUCTIONS

Aerosol NEU1161 Pest Spray will kill insect pests such as: ants, beetles, carpet beetles, caterpillars, centipedes, American cockroaches, earwigs, fleas, house flies, millipedes, moths, pillbugs, silverfish, sowbugs.

To treat indoors, spray thoroughly into infested areas and insect hiding places, such as cracks and crevices; around baseboards and window and doorframes; underneath and behind, refrigerators, stoves, cabinets and garbage cans; under sinks; around plumbing; and in dark corners. Product can also be sprayed directly onto pests. Use stream setting for cracks and crevices. Repeat treatment as necessary.

Use outdoors on window and door frames, building foundations, under wood siding and any cracks and crevices around building foundation or stucco where pests may find entry and wherever pests are observed. Thoroughly spray surfaces and pests. Use stream setting for cracks and crevices. Repeat treatment as necessary.

[The registrant may use this optional statement:

"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."

OPTIONAL STATEMENTS

(Marketing claims and product information that may be presented on the container or supplemental labeling):

- Does not contain piperonyl butoxide [butyl-carbityl (6-propylpiperonyl) ether].
- Does not contain PBO
- Patented technology
- Unique, patented formula.
- Patented
- U.S. Patent # 5,700,473
- Insect (bug) spray
- Kills insects (bugs)
- Kills all stages of insects (bugs), including eggs (larvae and pupae)
- Kills bugs (insects), including larvae and pupae
- Kills insects (bugs) in minutes
- Kills insects (bugs) fast

AEROSOL NEU1161 RESIDUAL PEST SPRAY LABEL

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- Kills (ants), (carpet beetles), (American cockroaches), (earwigs), (house flies), (silverfish), (sowbugs)
- Drives pests from hiding places and kills
- Based on plant oils.
- Water based.
- Non-staining.
- Does not persist for long periods in the environment.
- Kills bugs on contact
- Kills insects on contact.
- Provides quick control of pests
- Quick control
- Indoor – outdoor
- Indoor/outdoor
- Plant based insect spray.
- Use regularly to keep areas free of bugs
- Regular use prevents infestation
- Made from chrysanthemum flowers.
- Made with botanical pyrethrins from chrysanthemum flowers.
- Actives derived from plant extracts.
- Easy to use.
- Can be used in/around household food preparation areas.
- Contains sesame oil.
- Fast knockdown.
- Quick knockdown
- Fresh citrus scent.
- Mild citrus scent.
- Pleasant citrus scent.
- Spray surfaces where pests (bugs) crawl.
- For household use only.
- Avoid spraying plants directly
- Avoid spraying directly on plants
- Avoid spraying vegetation directly
- Avoid spraying on vegetation directly
- Caution: some floors may be slippery after spraying
- Some floors may be slippery after spraying
- Manufactured under a license of Neudorff.
- Sold under a license of W. Neudorff GmbH KG, Germany.
- Manufactured under a license of W. Neudorff GmbH KG, Germany.



- Gentle mist
- Contains no aerosol propellants. [Powered by (compressed) air].
- Sprays in any direction – even upside down

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