

67702-21

2/5/2009

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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 Dr.
Great Falls, VA 22066

FEB 05 2009

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Mr. Talarek:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated January 22, 2009 for:

EPA Registration No. 67702-21 Neudorff's Insecticidal Soap Ready-To-Use

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-5967.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer L. Gaines", written over the typed name and title.

Jennifer Gaines
Wildlife Biologist
Insecticide-Rodenticide Branch
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 67702-21	2. EPA Product Manager Meredith Laws	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Neudorff's Insecticidal Soap Ready-To-Use	PM# 61 Insecticide-Rodenticide Branch	
5. Name and Address of Applicant (Include ZIP Code) W. Neudorff GmbH KG c/o Walter G. Talarek PC 1008 Riva Ridge Drive Great Falls, VA 22066-1620 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: NOTIFICATION EPA Reg. No. <u>FEB 05 2009</u> Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of minor label revisions per PR Notices 98-10, 2007-4 and 2008-1. See the enclosed letter to Ms. Linda Arrington, Notifications & Minor Formulations Team Leader, for a full explanation of the notification and the certifications required by the PR Notices.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Walter G. Talarek		Title Authorized Agent	
		Telephone No. (Include Area Code) 703-759-4837	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Authorized Agent	
4. Typed Name Walter G. Talarek		5. Date January 22, 2009	

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LAW OFFICES OF
WALTER G. TALAREK, P.C.
1008 RIVA RIDGE DRIVE
GREAT FALLS, VA 22066-1620

PHONE: 703-759-4837
FAX: 703-759-5548
E-MAIL: WTALAREK@VERIZON.NET

January 22, 2009

DELIVERED BY COURIER

Linda Arrington
Team Leader, Notifications and Minor Formulations
Registration Division
c/o Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re: Neudorff's Insecticidal Soap Ready-To-Use
EPA Reg. No. 67702-21
Notification

Dear Ms. Arrington:

By this notification, W. Neudorff GmbH KG ("Neudorff") is revising label for Neudorff's Insecticidal Soap Ready-To-Use, EPA Reg. No. 67702-21. In essence, the notification makes the following minor revisions to the product's label:

1. Revises the Environmental Hazards section to comport with PR Notice 2008-1;
2. Revises the Storage and Disposal section and adds a Batch Code to comport with PR Notice 2007-4; and
3. Revises the Notice to Buyer section to comport with EPA's Label Review Manual.

Please note that this notification incorporates the pending label revision dated January 6, 2009, which would add an asterisk and a qualifying statement whenever the Ecosense brand name is used in conjunction with the sale or distribution of this product.

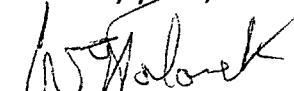
Two (2) copies of the revised label are enclosed. One copy has the revisions being made by this notification highlighted in yellow.

This notification is consistent with the guidance in PR Notices 98-10, 2007-4, and 2008-1 and the requirements of EPA's regulations at 40 CFR §§ 152.46, 156.10, 156.80, 156.140, 156.144,

156.146, and 156.156., and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the guidance of PR Notice 98-10, 2007-4, and 2008-1 and the requirements of 40 CFR §§ 152.46, 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions about this notification, please feel free to call me.

Sincerely yours,



Walter G. Talarek
Authorized Agent

Enclosures

NEUDORFF'S INSECTICIDAL SOAP

READY-TO-USE

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

NOTIFICATION

FEB 05 2009

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS XXX oz

PRECAUTIONARY STATEMENTS

Environmental Hazards: 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.

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. 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

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.

Shake container before use. 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

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NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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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.

PESTS

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE will control insect pests such as (but not limited to): 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).

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

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.

- 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

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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- 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.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE 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.
- Patented technology
- Unique, patented formula.
- Read Entire Container Label Before Using This Product.

● -For Organic Gardening

● -For Organic Production

- 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
- Unconditionally Guaranteed
- Money back guarantee
- Easy 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.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE 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.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE is a contact killer for both insect and mite pests.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE penetrates the body of pests and results in rapid death. It kills pests by disrupting membrane and cellular function.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE contains specially selected soaps (fatty acid salts) chosen for effective pest control.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE has been formulated to provide optimum spreading.

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NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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-NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE 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



-Houseplants, Flowers, Fruits, Vegetables, Trees, Shrubs

-Kills insects and mites on roses, flowers, fruits, vegetables and houseplants

-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



[when The Scotts Company uses the brand name Ecosense when selling or distributing this product, it must place an asterisk after the brand name and, in close proximity to the brand name, place the statement 'not intended to imply environmental safety either alone or compared to other products']

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

For information on NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE, call 250-652-5888, Monday through Friday, 9 am to 5 pm PST.

Registration #: 67702-21

Establishment #: