

67702-21

12/11/2009

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



OFFICE OF  
PREVENTION, PESTICIDES,  
AND TOXIC SUBSTANCES

December 11, 2009

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

Dear Mr. Talarek:

Subject: (1) Notification of qualifying phrase for distributor brand name

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice, dated November 12, 2009, for Neudorff Insecticidal Soap Ready-To-Use, EPA Reg. No. 67702-21.

The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The information submitted with the application has been stamped "Notification" and will be placed in our records. However, please note that, per an agreement between the Office of Pesticide Programs and the Scotts Company, this is a time-limited claim, and must be removed from the label once the allowed time-period has expired.

If you have any questions, please contact me directly at 703-308-8735 or email me at [chao.julie@epa.gov](mailto:chao.julie@epa.gov).

Regards,

A handwritten signature in black ink, appearing to read "Julie A. Chao".

Julie A. Chao  
Insecticide-Rodenticide Branch  
Registration Division (7505P)



**Yellow - Applicant Copy**

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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

November 12, 2009

DELIVERED BY COURIER

Linda Arrington, Team Leader  
Notifications and Minor Formulations Team  
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

**NOTIFICATION**

**DEC 11 2009**

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

Dear Ms. Arrington:

Please find enclosed W. Neudorff GmbH KG's (Neudorff's) application for a notification for the registration for Neudorff's Insecticidal Soap Ready-To-Use, EPA Reg. No. 67702-21. In essence, this notification replaces the current optional claim regarding a qualifying symbol and a disclaimer for the Ecosense brand name with the following optional claim: "[when the Scotts Company uses the brand name Ecosense when selling or distributing this product, it must place a qualifying symbol after the brand name and, in close proximity to the brand name, place the statement 'economically sensible alternative pest control']". The Ecosense brand name belongs to the Scotts Company, which is a supplemental distributor of this product.

Please note that a notification proposing this revision was rejected on August 1, 2009, by William Jacobs of the Insecticide-Rodenticide Branch, Registration Division. However, the same revision was made by notifications to the registrations for NEU1140F RTU Copper Soap (EPA Reg. No. 67702-1) and Sulfur/Pyrethrins Fungicide/Insecticide RTU (EPA Reg. No. 67702-15), which were approved by you on October 29, 2009. Similarly, Linda Hollis, PM 91, Biopesticides and Pollution Prevention Division, approved notifications making the same revision to the registrations for NEU1165M Slug and Snail Bait (EPA Reg. No. 67702-3) and NEU1173H RTU

(EPA Reg. No. 67702-27) on September 1, 2009, and September 8, 2009, respectively. Therefore, Neudorff respectfully requests your reconsideration of this proposed revision to the label for Neudorff's Insecticidal Soap Ready-To-Use.

Two (2) copies of the revised label are enclosed. One (1) of the copies has the revision being made by this notification highlighted in yellow.

This notification is consistent with PR Notices 98-10 and 2002-X and EPA's regulations at 40 CFR 152.46 and 156.10, 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 terms of PR Notices 98-10 and 2002-X and 40 CFR 152.46 and 156.10, 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,

W. F. Toland

Walter G. Talarek  
Authorized Agent

## Enclosure – Application for Notification

**Cc:** Dan Kenney, RD, EPA

# NEUDORFF'S INSECTICIDAL SOAP RTU

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

**NOTIFICATION**
**DEC 11 2009**
**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

**NET CONTENTS:** 8 oz, 16 oz, 24 oz, 32 oz, 40 oz, 1 gallon

### 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.

### 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 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.

[Registrants must use one of the following:

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 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).

OR

<p><b>Before You Use</b> Please read entire label before using.</p>	<ul style="list-style-type: none"> <li>- Use only as directed</li> <li>- Shake container before use.</li> <li>- Do not use on sweet peas, nasturtiums, or delicate ferns.</li> <li>- Use with care on new seedlings, transplants and blooms.</li> <li>- Avoid spraying during full sun.</li> <li>- 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 to larger areas.</li> </ul>
<p><b>How to Use</b></p>	<p>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.</p>
<p><b>Use Site</b></p>	<p><b>Pests Controlled</b></p>
<p><b>Indoor, Outdoor and Greenhouse</b> Fruit and Nut Trees such as: apple,</p>	<p>Insect pests such as (but not limited to): adelgids (woolly aphids), aphids,</p>

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL  
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cherry, peach, pear, pecans, and almonds. Corn, soybeans, nelons, tomatoes. Vegetables such as: beans, cabbage, cucurbits, peas, potatoes. Figs Small Fruits such as: grapes, strawberry, raspberry. Citrus, houseplants, ornamental and bedding plants. Ornamental and shade trees such as birch, evergreen, holly and oak.	lacebugs, mealybugs, mites, grasshoppers, leafhoppers, scale insects, plant bugs, sawfly larvae (pear and rose slugs), psyllids, tent caterpillars, thrips, spider mites, earwigs and whitefly.
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[The registrant may use one or more of these optional statements:

**NOTICE TO BUYER**

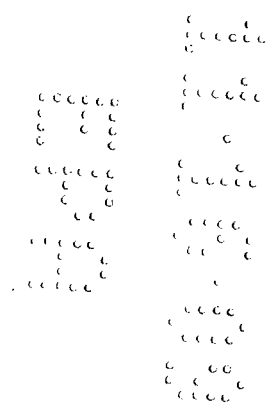
To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated on this label only when used in accordance with directions under normal use conditions. This warranty does not extend to use of 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.

[The] (Insert Company name) Guarantee- If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

[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



NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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- ideal for houseplants
- kills insects in minutes
- kills insects fast
- fast acting
- kills insects on contact
- provides quick control of pests
- indoor – outdoor
- For use on plants—indoors and outdoors
- For use indoor and 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.
- Read the label first!
- Quick Facts:
  - Multipurpose insect killer
  - Easy to use, fast acting
  - use up to and including day of harvest
- Kills
  - For use on vegetables, fruit and nut trees, citrus, berries, ornamentals, shrubs, flowers, and trees in homes, gardens and greenhouses.
  - For use on vegetables, flowers, fruits, & houseplants
  - Can be used in vegetable gardens.
  - Patented technology
  - Unique, patented formula.
  - 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 (wooly aphids), aphids, earwigs, grasshoppers, lacebugs, mealybugs, mites, plant bugs, leafhoppers, psyllids, sawfly larvae, scale insects, tent caterpillars, thrips, whitefly, spider mites and other listed pests.
  - KILLS spider mites, aphids, mealybugs, whiteflies and other listed pests.
  - Where to Use: For use indoors, outdoors, and in greenhouses.
  - When to Use: When insects, or insect damage first appears.
  - 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 LABEL

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- 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.
- 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.
- This product will control insect pests on vegetables, houseplants, ornamentals and fruit and nut trees and is effective against adult, larvae, and nymph stages of pests.
- Multi-purpose
- Insect killer
- www.neudorff.de



- Houseplants, Flowers, Fruits, Vegetables, Trees, Shrubs
- For use indoors-outdoors
- For household home garden use.
- For questions or comments call toll-free X-XXX-XXX-XXXX
- Questions, comments (or medical information) X-XXX-XXX-XXXX
- © 20XX Licensed (insert company name). World rights reserved.
- Manufactured. Distributed by: (insert company name)
- Made in/Produced in: \_\_\_\_\_ (from US and imported products/parts)
- See back (booklet) label for additional first aid
- This container is made with a minimum X% recycled material
- Manufactured under[a] license of W. Neudorff GmbH KG[, Germany]
- Sold under a license of W. Neudorff GmbH KG
- 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 a qualifying symbol after the brand name and, in close proximity to the brand name, place the statement "economically sensible alternative pest control"]

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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 #: 67702-DEU-1

