

67702-21

6/10/2010

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 10, 2010

W. Neudorff GmbH KG
c/o Walter G. Talarek PC
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

Subject: Neudorff's Insecticidal Soap RTU
EPA Reg. No. 67702-21
Notification Application Dated May 20, 2010

Dear Mr. Talarek:

The Agency has received your Application for Pesticide Notification under Pesticide Registration Notices (PRN) 98-10, dated May 20, 2010, for the product Neudorff's Insecticidal Soap RTU, EPA Reg. No. 67702-21. The Registration Division (RD) has reviewed this request and finds that the actions requested fall within the scopes of PR Notice 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records. Please note on page 3 of the label in the new optional table that "melons" has been misspelled.

If you have any questions, please call me directly at (703) 308-8043.

Sincerely,

A handwritten signature in black ink, appearing to read "Marianne Lewis".

Marianne Lewis
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 RTU	PM# 22 Chief/Insect-Rodent 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: EPA Reg. No. _____ 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 the addition of 11 optional marketing claims and the modification of 1 existing optional marketing claim under PR Notice 98-10. See the enclosed letter to Ms. Meredith Laws, Chief, Insecticide-Rodenticide Branch, for a full explanation of the notification and the certification required by PR Notice 98-10.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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	<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.			
2. Signature 		3. Title Authorized Agent	
4. Typed Name Walter G. Talarek		5. Date May 20, 2010	
6. Date Application Received (Stamped)			

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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

May 20, 2010

DELIVERED BY COURIER

Meredith Laws, Chief
Insecticide-Rodenticide Branch
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 RTU
EPA Reg. No. 67702-21
Notification

Dear Ms. Laws:

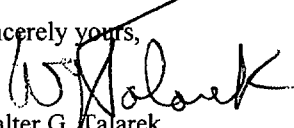
Please find enclosed W. Neudorff GmbH KG's ("Neudorff's") application under PR Notice 98-10 for a notification to its registration for Neudorff's Insecticidal Soap RTU, EPA Reg. No. 67702-21. The notification would add eleven (11) optional marketing statements to the product's label and revise one of the existing optional marketing statements. See page 5 of the enclosed label. Nine (9) of the new optional marketing statements are the URLs for Neudorff's subregistrants' WEB sites. One of the new optional marketing statements states "Superscript is first letter of lot number". This statement is intended to be a means by which subregistrants which produce the product at multiple establishments can identify quickly the EPA establishment at which a product was produced based on the lot number.

This notification is consistent with PR Notice 98-10 and EPA's regulations at 40 CFR 152.46, 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 Notice 98-10 and 40 CFR 152.46, 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.

Two (2) copies of the revised label are enclosed. One copy of the label has the revisions being made by this notification highlighted in yellow in order to assist you with your review.

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

Sincerely yours,


Walter G. Talarek
Authorized Agent

Enclosures – Application for Notification



NEUDORFF'S INSECTICIDAL SOAP RTU

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

NOTIFICATION

JUN 10 2010

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:

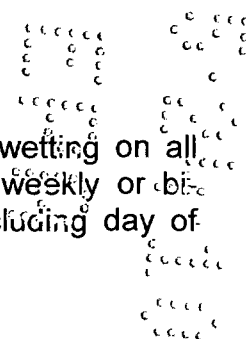
DIRECTIONS FOR USE

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.



NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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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

Before You Use Please read entire label before using.	<ul style="list-style-type: none"> - Use only as directed - Shake container before use. - Do not use on sweet peas, nasturtiums, or 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 to larger areas.
How to Use	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.
Use Site	Pests Controlled
Indoor, Outdoor and Greenhouse Fruit and Nut Trees such as: apple,	Insect pests such as (but not limited to): adelgids (woolly aphids), aphids,

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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<p>cherry, peach, pear, pecans, and almonds.</p> <p>Corn, soybeans, nelons, tomatoes.</p> <p>Vegetables such as: beans, cabbage, cucurbits, peas, potatoes.</p> <p>Figs</p> <p>Small Fruits such as: grapes, strawberry, raspberry.</p> <p>Citrus, houseplants, ornamental and bedding plants.</p> <p>Ornamental and shade trees such as birch, evergreen, holly and oak.</p>	<p>lacebugs, mealybugs, mites, grasshoppers, leafhoppers, scale insects, plant bugs, sawfly larvae (pear and rose slugs), psyllids, tent caterpillars, thrips, spider mites, earwigs and whitefly.</p>
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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.

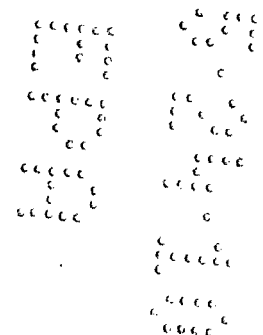
[The] (Insert Company name) Guarantee- If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

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

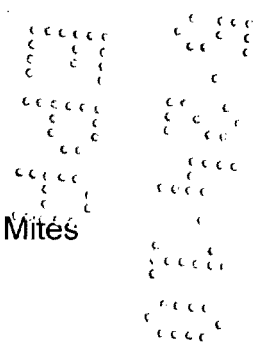


NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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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 (woolly 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.



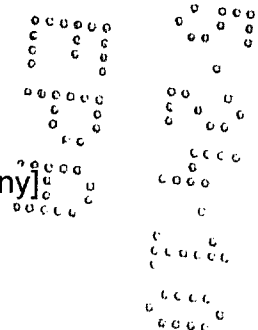
NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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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 precautionary statements
- This container is made with a minimum X% recycled material
- Designed for Independent Retailers
- www.whitneyfarms.com
- www.ortho.com
- www.espoma.com
- www.worryfreebrand.com
- www.bonideproducts.com
- www.gardensafe.com
- www.gardensalive.com
- www.killsbugsdead.com
- www.bayeradvanced.com
- Superscript is first letter of lot number
- Manufactured under[a] license of W. Neudorff GmbH KG[, Germany]
- Sold under a license of W. Neudorff GmbH KG



NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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- 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"]

]

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

