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67702-24

2-25-2008



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 25 2008

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

SUBJECT: Applications for Pesticide Notification – Add Logo, Additional Container Size, and
Additional Emergency Phone #/Graphic/Optional Hose-end Sprayer Instructions

NEU1140F RTU Copper Soap	EPA Reg. No. 67702- 1
H02 Moss Killer Concentrate	EPA Reg. No. 67702-12
Sulfur/Pyrethrins Fungicide/Insecticide	EPA Reg. No. 67702-17
Bug-N-Sluggo Insect, Slug and Snail Bait	EPA Reg. No. 67702-24
Applications Dated November 19, 2007	
NEU1140F Copper Soap	EPA Reg. No. 67702- 2
NEU1128 RTU Copper Soap	EPA Reg. No. 67702-13
Applications Dated November 21, 2007	
H02 Moss Killer Concentrate	EPA Reg. No. 67702-12
Application Dated December 13, 2007	

Dear Mr. Talarek:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above products. The Registration Division (RD) has conducted a review of these requests for their applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The labels submitted with the applications have been stamped "Notification" and will be placed in our records. Please note: at the next printing of the subject labels, please include the phrase "To the extent consistent with applicable law," at the beginning of the "NOTICE TO BUYER (WARRANTY)" section.

If you have any questions, please contact me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

Rachel C. Halloman

for
Linda Arrington
Notifications & Minor Formulations Team Leader
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 67702-24	2. EPA Product Manager George LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bug-N-Sluggo Insect, Slug and Snail Bait	PM# 13	
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. _____ FEB 25 2008 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 a container size, i.e., 2116 lbs (960 kgs), per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA 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.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" 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 checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2116 lbs (960 kgs)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" 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.			8. Date Application Received (Stamp here)
2. Signature 		3. Title Authorized Agent	
4. Typed Name Walter G. Talarek		5. Date November 19, 2007	

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BUG-N-SLUGGO® INSECT, SLUG AND SNAIL BAIT

For Outdoor Use Around Residential Sites

NOTIFICATION

FEB 25 2008

Active Ingredient:	By weight:
Iron phosphate.....	0.97%
Spinosad (a mixture of spinosyn A and spinosyn D).....	0.07%
Other Ingredients:	98.96%
Total.....	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID
If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Telecommunications Network hotline at 1-800-858-7378 for emergency medical treatment information.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: Caution. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

Environmental Hazards: For terrestrial uses. This product is toxic to aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

NET WEIGHT 1 oz, 13 oz, 26 oz, 0.5 lb, 1 lb, 1.25 lbs, 1.5 lbs, 2 lbs, 2.25lbs, 2.5 lbs, 3 lbs, 3.2 lbs, 4 lbs, 5 lbs, 5.25 lbs, 5.5 lbs, 6 lbs, 7 lbs, 8 lbs, 10 lbs, 20 lbs, 25 lbs, 21.6 lbs (960 kgs)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

PESTS CONTROLLED: earwigs, cutworms, sowbugs, pillbugs, crickets, ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), slugs, snails

APPLICATION DIRECTIONS:

Scatter the bait granules on the soil around or near the plants to be protected with a suitable hand or power operated spreader (gravity or rotary) to ensure uniform coverage over the treatment area. Apply bait evenly at approximately 0.5 to 1 lb per 1000 square feet, or for smaller areas, 0.075 to 0.15 oz, or 0.5 to 1 teaspoon, per square yard. Do not place in piles. For slugs and snails also scatter the bait around the perimeter of the area to provide a protective "barrier" for slugs and snails entering the area. If the ground is dry, wet it before applying bait. The product works best when soil is moist but with little or no standing water. Do not use food utensils such as tablespoons, cups, etc. for food purposes after pesticide use.

Do not apply more than 3 times in any 30 day period. Apply at the higher rate if the infestation is severe. Re-apply after heavy rain or watering.

For seedlings spread the bait around the base of the stem. For trees or shrubs, spread the bait around the base of the tree. For small plots, treat around the base of the plants to be protected. In greenhouses, scatter the bait in the pots of plants being damaged or around pots on greenhouse benches.

USE SITES:

Vegetables, including: artichokes (globe), asparagus, beans, beets, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, corn, cucumbers, eggplants, garlic, lettuce, onions, peas, peppers, potatoes, radishes, rutabagas, spinach, soybeans, squash, Swiss chard, tomatoes and turnips; **Fruits**, including: apples, avocados, apricots, cherries, grapes, melons, peaches, plums, citrus, pears; **Berries**, including: strawberries, blueberries, loganberries; **Outdoor Ornamentals; Greenhouses (Non-Commercial); Lawns; Turf.**

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or 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.

CONTAINER DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEAN-UP for disposal instructions. Never place unused product down any indoor or outdoor drain.

The registrant may use one or both of these two optional statements, either:

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"WARRANTY

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. Seller makes no other warranties, either expressed or implied."

or

OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product or refund your money. Simply send your name, address and proof of purchase to [insert name and address of supplemental registrant]."

[The following claims and product information, may or may not be presented on the product's label and labeling:

-Quick Facts

-Product Facts

-What it does: Kills insects, snails and slugs

-Where to Use: For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens and in greenhouses

-Read the Label First!

-NOTE: This package is sold by weight. Contents may have settled during shipment.



-For Organic Gardening



-For Organic Production

-US Patent number x,xxx,xxx.

-Patent Pending

-This container is made from XX% recycled materials.

-The highly compressed granules (pellets) are easy to use, clean to handle and economical.

-Patented technology.

-Patented snail & (and) slug killer.

-Patented snail, slug and insect killer

-Patented insect, snail and slug killer

-Patented formula

-Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.

-Easy to apply granules (pellets).

-Kills snails & (and) slugs.

-Pellets

-Kills slugs, snails and insects.

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- SLUG, SNAIL AND INSECT BAIT
 - SLUGGO plus insect killer
 - Slug and bug control
 - Slug and bug killer
 - INSECT, SLUG AND SNAIL (BAIT)(PELLETS)
 - bug and slug control
 - bug and slug killer
 - Kills (earwigs,) (cutworm,) (sowbugs,) (pillbugs,) (crickets,) (ants,) (slugs,) (snails,)
 - Spinosad is derived from a naturally occurring soil dwelling bacterium.
 - Spinosad is biologically derived from *Saccharopolyspora spinosa*, a naturally occurring soil organism.
 - Spinosad is derived from a soil dwelling bacterium.
 - Treats (will treat) x,xxx sq. ft.
 - 1 lb treats 2000 ft²
 - Effective for up to 4 weeks.
 - Lasts up to 4 weeks.
 - Remains effective for up to 4 weeks.
 - Proven snail & (and) slug & (and) insect killer (kill, control).
 - Convenient. Easy-to-use. Requires no mixing, spraying, or special applicators.
 - SATISFACTION GUARANTEED.
 - Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
 - Can be used in vegetable gardens.
 - Can be used up to and including day of harvest.
 - Ideal for vegetable gardens.
 - For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens, and in greenhouses (non-commercial).
 - Use around flowers, gardens, and fruit trees.
 - Lawn insecticide
 - Can be used on lawns
 - Home and Garden
 - Iron phosphate occurs naturally in soil.
 - Read Entire Container Label Before Using This Product.
 - Unconditionally guaranteed by [insert name of supplemental registrant].
 - Baits and Kills
 - For household home garden use.
 - The slugs and snails controlled by this product include (but are not limited to):
Deroceras reticulatum (Field slug), *Deroceras laeve* (Smooth slug), *Arion subfuscus* (Dusky slug), *Arion circumscriptus* (Gray garden slug), *Arion hortensis* (Black field slug), *Arion rufus* (Large red slug), *Arion ater* (Large black slug), *Limax flavus* (Spotted garden slug), *Limax tenellus* (Slender slug), *Ariolimax columbianus* (Banana slug), *Helix* spp., *Helicella* spp., and *Cepaea* spp.
 - Kills a wide variety of slugs and snails
 - Effective against a wide variety of slugs, snails and insects.
 - Effective against a wide variety of insects, slugs and snails.

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- Lures slugs, snails and insects from hiding places and plants.
 - Lures insects, slugs and snails from hiding places and plants.
 - No slime trails
 - No messy cleanup
 - Dead snails, no slime trails.
 - Attracts and kills slugs, snails and insects
 - Attracts and kills insects, slugs and snails
 - Attracts and kills
 - For control (or suppression) of (earwigs), (cutworm), (sowbugs), (pillbugs), (crickets), (ants), (slugs), (snails)
 - Contains Spinosad
 - Contains Ferramol™ Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
 - Made with Ferramol™ Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
 - Ferramol™ is a trademark of W. Neudorff GmbH KG, Germany.
 - Sluggo® is a registered trademark of W. Neudorff GmbH KG, Germany
 - www.neudorff.de
 - Manufactured under a license of W. Neudorff GmbH KG, Germany.



- Do not apply within 3 days of harvest.
- easy to see blue bait
- distinct color
- special blue formulation
- blue bait
- Evening is the best time to apply the bait as pests travel and feed mostly by night or early morning.
- Treat all likely areas of infestation, especially around the perimeter of garden plots, for slugs and snails because these pests travel into plant areas from daytime refuges. They favor damp places around vegetable plants such as beans, tomatoes, lettuce, cabbage, celery and squash. Other favorite areas are flower gardens, rockeries, hedges, dichondra, lawns, ivy patches, and other ground cover where they obtain shelter by day.

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,
D-31860 Emmerthal, Germany
011-49-5155-62421

EPA Registration #67702-24

EPA Establishment #67702-WG-1