

67702-24

3/20/2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

MAR 20 2009

Subject: Notification(s) for Label Revisions under PRN 98-10, PRN 2007-4 and
PRN 2008-1

Dear Mr. Talarek:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notices (PRN) 98-10, PRN 2007-4 and PRN 2008-1 dated, January 22, 2009 for:

EPA Registration 67702-24

Bug-N-Sluggo Insect, Slug and Snail Bait

The Registration Division (RD) has conducted a review of the request(s) for applicability under PRN 98-10, PRN 2007-4 and PRN 2008-1, and finds that the label changes requested fall within the scope of PRN-98-10, PRN-2007-4 and PRN 2008-1. 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 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda", is written below the word "Sincerely,".

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

☒ None ☐ 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

☐ 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.

NOTIFICATION

Product Name

MAR 20 2009

Section - II

☐ Amendment - Explain below.

☐ Resubmission in response to Agency letter dated _____

☒ Notification - Explain below.

☐ Final printed labels in response to Agency letter dated _____

☐ "Me Too" Application.

☐ 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
☐ Yes*
☐ No

Unit Packaging
☐ Yes
☐ No

Water Soluble Packaging
☐ Yes
☐ No

2. Type of Container

☐ Metal
☐ Plastic
☐ Glass
☐ Paper
☐ 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

☐ Label

☐ Container

4. Size(s) Retail Container

5. Location of Label Directions

☐ On Label

☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph
☐ Paper glued
☐ Stenciled

☐ 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

Walter G. Talarek

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

NOTIFICATION

MAR 20 2009

Re: Bug-N-Sluggo Insect, Slug and Snail Bait
EPA Reg. No. 67702-24
Notification

Dear Ms. Arrington:

By this notification, W. Neudorff GmbH KG ("Neudorff") is revising label for Bug-N-Sluggo Insect, Slug and Snail Bait, EPA Reg. No. 67702-24. 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;
3. Revises the Notice to Buyer section to comport with EPA's Label Review Manual;
4. Revises the name of the National Pesticide Telecommunications Center in the First Aid section to the "National Pesticide Information Center";
5. Revise Neudorff's WEB site address; and
6. Changes the EPA Establishment Number to 67702-DEU-2.

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,

4 of 9

Sincerely yours,

Sincerely yours,


NOTIFICATION

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

For Outdoor Use Around Residential Sites

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 Information Center 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: 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 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. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

NET WEIGHT 1 oz, 13 oz, 26 oz, 0.5 lb, 1 lb, 1.25 lbs, 1.5 lbs, 2 lbs, 2.25 lbs, 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, 2116 lbs (960 kg)

DIRECTIONS FOR USE

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: 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

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

"WARRANTY

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. To the extent consistent with applicable law, 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.

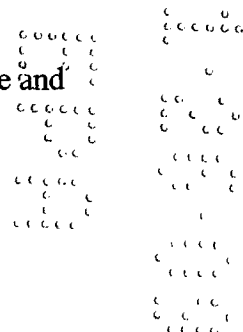
-Patent Pending

-This container is made from XX% recycled materials.

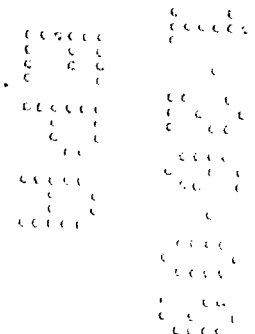
-The highly compressed granules (pellets) are easy to use, clean to handle and economical.

-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.
- 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.
- 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.com
- Manufactured under a license of W. Neudorff GmbH KG, Germany.



NOTIFICATION

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- Do not apply within 3 days of harvest.
- 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-DEU-2