

67702-27

9/14/2012

1/12

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

SEP 14 2012

Subject W Neudorff GmbH KG, NEU1173H RTU
EPA Registration No 67702-27
Amendment to Add Container Sizes and Marketing Statements and to Amend
Environmental Hazards Statement
D# 463040, Application Dated 3/29/12

Dear Mr Talarek

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you

- 1 Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data
- 2 Submit two (2) copies of your final printed labeling before you release the product for shipment Final printed labeling means the label or labeling of the product when distributed or sold Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(b) Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions

If you have any questions contact Chris Pfeifer at 703-308-0031 or by email at pfeifer_chris@epa.gov

Sincerely,

Linda A Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)

Enclosure

CONCURRENCES

SYMBOL ▶	7511P						
SURNAME ▶	PFEIFER						
DATE ▶	9/13/12						

2/12

NEU1173H RTU

Active Ingredient	
Iron HEDTA (FeHEDTA)	1.5%
Other Ingredients	98.5%
Total	100.00%

ACCEPTED

SEP 14 2012

EPA REG NO 67702-27

EPA EST

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg No 67702-27

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 [Optionally, supplemental distributor's may use the following wording and own toll-free hotline number For medical emergency information, you may call toll free 1-XXX-XXX-XXXX]	

NET CONTENTS 12, 16, 22, 24, 32 and 64 fluid ounces, 1 gallon and 1 33 gallons, 1 5 gallons, 2 gallons, 2 5 gallons, 5 gallons, 10 gallons

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION Causes slight 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 Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

ENVIRONMENTAL HAZARDS

For terrestrial uses Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark Do not contaminate water when disposing of equipment washwater or rinsate 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 Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems

[For containers over 5 gallons use the following language

Effluent Discharge

NEU1173H RTU

Page 2 of 11

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA]

DIRECTIONS FOR USE

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

[Subregistrants may choose one of the following formats

Format 1

[One of the two following Use Sites and Pests section groupings must be used on the labels of products sold or distributed in all states, except California. The second section must be used on the labels of products sold or distributed in California

[Section 1]

Use Sites

Use to selectively control/suppress broadleaf weeds and diseases growing in lawns

Pests

Controls or suppresses weeds such as but not limited to

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)
- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Creeping Charlie/Ground ivy (*Glechoma hederacea*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss, liverworts, algae and lichens
- Narrow-leaved plantain (*Plantago lanceolata*)
- Oxalis (*Oxalis* spp)
- Persian Speedwell (*Veronica persica*)
- Prostrate knotweed (*Polygonum aviculare*)
- Shepherd's-purse (*Capsella bursa-pastoris*)

NEU1173H RTU

Page 3 of 11

- Silverweed cinquefoil (*Potentilla anserina*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Controls or suppresses diseases such as but not limited to

- Dollar Spot
- Rust
- Snow Mold

OR

[Section 2]

Use Sites

Use to selectively control/suppress broadleaf weeds growing in lawns

Pests

Controls weeds

- Bull thistle (*Cirsium vulgare*)
- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- English daisy (*Bellis perennis*)
- Moss
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian speedwell (*Veronica persica*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)

Suppresses weeds

- Broadleaf plantain (*Plantago major*)

]

Application Directions

Shake well before using

Do not dilute Thoroughly spray weeds Use a coarse nozzle setting to reduce drift Repeat treatment in 3 to 4 weeks for best results

What will I see?

NEU1173H RTU

Page 4 of 11

Works quickly dying weeds will be seen within hours of application Treated weeds, moss or algae will turn brown or black Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks May stain thatch (dead grass under lawn), this does not affect the health of the grass

Use Precautions

Do not apply to drought stressed grass, ensure lawn is well watered prior to application Do not apply when the daytime temperature will exceed 85°F Do not apply to bentgrass If unsure of grass sensitivity, test spray a small area of your lawn Do not apply to newly seeded areas prior to grass seed germination Avoid spraying desirable plants Any desirable plants or structures accidentally contacted should be rinsed with water To avoid staining wait until treated area dries before re-entry Do not apply if rainfall is expected within 3 hours of application Do not irrigate within 3 hours of application Do not apply to the same area more than 4 times a year, not including spot treatments

OR

Format 2

DIRECTIONS FOR USE	
It is a violation of Federal Law to use this product in a manner inconsistent with its labeling	
Before You Use	Shake well before each use Do not dilute
How to Use	Thoroughly spray weeds Use a coarse nozzle setting to reduce drift Repeat treatments in 3 to 4 weeks for best results
What Will I See?	Works quickly, dying weeds will be seen within hours of application Treated weeds, moss or algae will turn brown or black Occasionally a darkening of the grass leaf blades can occur after treatment however the grass will recover within a few days to weeks May stain thatch (dead grass under lawn), this does not affect the health of the grass
Pests [(Weeds, Diseases Moss & Algae)]	[insert one of the pests sections from Directions for Use above]
Use Precautions	-Do not apply to drought stressed grass Ensure that lawn is well watered prior to application -Do not apply when daytime

	<p>temperatures will exceed 85°F</p> <ul style="list-style-type: none"> -Do not apply to bentgrass or dichondra -If unsure of grass sensitivity, test spray a small area of your lawn -Do not apply to newly seeded areas prior to grass seed germination -Avoid spraying desirable plants Any desirable plants or structures accidentally contacted should be rinsed with water -To avoid staining, wait until treated area dries before re-entry -Do not apply if rainfall is expected within 3 hours of application -Do not irrigate within 3 hours of application -Do not apply to the same area more than 4 times a year
--	---

STORAGE AND 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 Store unused material, tightly closed, in original container only away from open flame

PESTICIDE DISPOSAL AND CONTAINER HANDLING

Non-refillable container Do not reuse or refill this container

If empty 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

STORAGE AND DISPOSAL [For use with Quick Connect Sprayer]

PESTICIDE STORAGE Completely discharge product in sprayer prior to storage Flip down [colour] spout to close **NO NEED TO DISCONNECT TRIGGER SPRAYER** Close nozzle on trigger sprayer Snap sprayer back into place Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals Store unused material, tightly closed, in original container only, away from open flame

PESTICIDE DISPOSAL AND CONTAINER HANDLING

Non-refillable container Do not reuse or refill this container

If empty 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

STORAGE AND DISPOSAL [For use with Pull 'N Spray Applicator]

PESTICIDE STORAGE Completely discharge product in sprayer prior to storage Flip down [colour] spout on cap **DO NOT DISCONNECT SPRAYER HOSE FROM CAP** Place sprayer back inside carrier on bottle with the nozzle facing down Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals Store unused material, tightly closed, in original container only, away from open flame

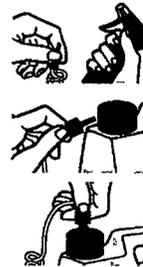
PESTICIDE DISPOSAL AND CONTAINER HANDLING
 Non-refillable container Do not reuse or refill this container
If empty Place in trash or offer for recycling if available
If partly filled Call your local solid waste agency for disposal instructions Never place unused product down any indoor or outdoor drain

BATCH CODE

[Optional For Use with Quick Connect Sprayer]

Quick Connect® Sprayer

- Remove sprayer Pull cord ALL THE WAY OUT
- Insert (colour) plug into spout (on cap) until it clicks
- Flip up spout Open nozzle at end of sprayer



[Optional For Use with Pull 'N Spray Applicator]

Pull 'N Spray® Applicator

<ul style="list-style-type: none"> • Remove sprayer from side carrier and unwrap hose completely • Insert (colour) plug at end of hose into [colour] spout on cap until it clicks • Flip up spout Spout must remain up while spraying 	
<ul style="list-style-type: none"> • Twist nozzle at end of sprayer to desired spray pattern 	
<ul style="list-style-type: none"> • Point sprayer away from body • Grasp sprayer by the handle • Slowly pull ring at bottom of sprayer handle until it stops and hold for two (2) seconds to ready the sprayer 	

<ul style="list-style-type: none"> • Press and hold button on sprayer to begin spraying • Pull ring at sprayer bottom again as needed to continue spraying 	
--	---

[Optional sprayer instructions

	<p>Attach Sprayer</p> <ul style="list-style-type: none"> ■ Remove sprayer from bottle and extend hose ■ Open flip-cap on bottle ■ Insert hose and plug into flip-cap opening until it snaps into place 		<p>Spray</p> <ul style="list-style-type: none"> ■ Adjust nozzle to stream or spray position. ■ Point sprayer downward and squeeze trigger repeatedly until liquid is released 		<p>After Use</p> <ul style="list-style-type: none"> ■ Turn sprayer nozzle to X (off) position. Do not unplug hose ■ Return sprayer to bottle. Sprayer will snap into place.
---	--	---	--	--	--

]

[The following claims and product information may or may not be presented on the product's label and labeling
-www.neudorff.com



- Read the label first!
- Quick Facts
- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Controls Broadleaf Weeds in Lawns
- NEU1173H RTU is a herbicide used to selectively control/suppress broadleaf weeds growing in lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Kills moss and weeds
- Moss and weed killer for lawns
- Kills moss and weeds, not lawns
- Kills moss and weeds, not grass
- Water-based
- This bottle will treat XXX ft²
- This container will treat XXX ft²
- Treats up to XXXX ft² (of lawn)
- Works in cool weather (down to 50 F)
- Rainfast in 3 hours
- Works fast

NEU1173H RTU

Page 8 of 11

- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- Derived from iron, which occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- Can re-seed lawn 1 day after spraying (applying)
- Can be used on new lawns (1 week) after grass emergence
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- Kills many common weeds like dandelion, clover, moss, narrow-leaved plantain, chickweed, and thistle
- Controls
 - dandelion, common chickweed, clover and other listed broadleaf weeds
 - moss, algae and lichens
- Where to Use
 - On lawns
 - do not apply to bentgrass or dichondra
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Weed killer for newly planted lawn
- Even works in cool weather
- Also works in cool weather
- Works in temperatures between 50 F and 85 F (10 C and 29 C)
- Effective at temperatures from 50 F to 85 F (10 C to 29 C)
- Patent pending
- Patent #6,972,273
- Kills weeds, down to the root
- Kills dandelions, down to the root
- Ready-To-Use
 - This product is ready to use
 - Do not mix with water
- (Helpful Hints) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds

- People and pets can enter treated area when spray dries
- (Dogs) (Pets) (People) can enter (area) after spray has dried
- (Dogs) (Pets) (People) can enter (area) after dried
- Designed for Garden Pro (Independent) Retailers
- Questions comments (or medical information) X-XXX-XXX-XXXX (or visit [insert subregistrants website])
- For questions or comments, call toll-free [1-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
- Guaranteed results
- Superscript is first letter of lot number
- READ THE LABEL FIRST!**
- Tough on weeds and disease, easy on lawns
- Prevent disease and kill the weeds!
- Kills most common lawn diseases fast!
- Herbicide and Fungicide in 1 for the Lawn!
- For a healthy lawn
- Easy-to-use weed and disease killer for the lawn
- Broadleaf weed and disease killer
- Disease and Weed Killer in one!
- Controls (Disease) (Weeds), (Moss), (Algae) and (Lichens) in lawns
- (5 in 1!) (4 in 1!) (3 in 1!) ! [for use with the corresponding number of the following pests] Controls (Disease), (Weeds), (Moss), (Algae) and (Lichens) in turf
- Controls disease in the lawn, kills the weeds
- Weed and disease killer for the lawn
- Cure your weed and disease problems fast
- Ideal weed & disease control for lawn
- Iron-based disease & weed control for lawn
- Lawns Controls dollar spot, snow mold, and rust
- Lawn Fungicide
- Controls (dollar spot), (snow mold), and (rust) on lawns
- Prevents and controls lawn diseases
- Promotes healthy, weed- and disease-free lawns
- Spot spray & destroy (weeds) (disease) (moss) in lawns
- Spray in the morning, enjoy in the evening after spray dries!
- Spray in the morning, enjoy in the evening
- Weed then seed one day after application
- Weed today, (re-)seed tomorrow
- Spray then seed one day after application
- Apply today, (re-)seed tomorrow
- Here today, gone tomorrow
- Can mow grass 24 hours after application
- Treat today – (re)seed tomorrow!
- Quick results

NEU1173H RTU

Page 10 of 11

[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']
]

[Supplemental distributors will use one of these two statements, either]

-Sold under a license of "W Neudorff GmbH KG, Germany"

OR

-Manufactured under a license of 'W Neudorff GmbH KG, Germany"

[Optional warranty statements Registrant has choice of using any or none

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions To the extent consistent with applicable law, 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, the Seller shall not be liable for any such use To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied

Or

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 To the extent consistent with applicable law, the seller shall not be liable for damages caused by buyer's use of 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

-Buyer assumes all responsibility for safety and use not in accordance with directions

Or

-Unconditionally Guaranteed by (company name) **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, refund your money, or substitute another (brand name) product Simply send your name, address and proof of purchase to (Company name & address)]

OR

12/12

[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

OR

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