



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

**OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION**

August 3, 2017

Walter G. Talarek
W. Neudorff GmbH KG
Postfach 1209
1008 Riva Ridge Drive
Great Falls, VA 22066

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – adding optional directions for ERGO-GRIP spray wand and altering optional claims.
Product Name: NEU1173H RTU
EPA Registration Number: 67702-27
Application Date: 07/13/2017
OPP Decision Number: 531441

Dear Mr. Talarek:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false

or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Cody Kendrick by phone at (703) 347-0468 or via email at kendrick.cody@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Andrew C. Bryceland". The signature is fluid and cursive, with the first name "Andrew" and last name "Bryceland" clearly legible.

Andrew Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

NEU1173H RTU

Active Ingredient:

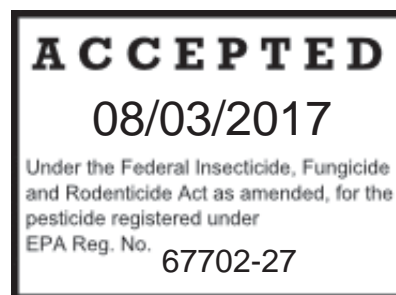
Iron HEDTA (FeHEDTA) 1.5%

Other Ingredients: 98.5%

Total: **100.00%**

EPA REG. NO. 67702-27

EPA EST.



KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	<ul style="list-style-type: none">-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

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*)

- 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*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Moss
- Speedwell spp.
- Persian speedwell (*Veronica persica*)
- White clover (*Trifolium repens*)

Suppresses weeds:

- Black medic (*Medicago lupulina*)
- English daisy (*Bellis perennis*)

]

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?

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 temperatures will exceed 85°F -Do not apply to bentgrass or dichondra

	<ul style="list-style-type: none"> -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
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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 wording that may or may not appear on the label]}

{OPTION 1}

[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.

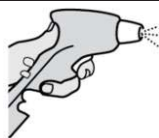


[Optional: For Use with Pull 'N Spray Applicator]

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. 	

- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.



]

{OPTION 2}

[



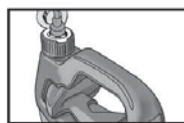
Attach Sprayer

- 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.



Spray

- Adjust nozzle to stream or spray position.
- Point sprayer downward and squeeze trigger repeatedly until liquid is released.



After Use

- Turn sprayer nozzle to X (off) position. Do not unplug hose.
- Return sprayer to bottle. Sprayer will snap into place.

]

{OR}

{OPTION 3}

[How To Use Your Sprayer:

1. Remove ERGO-GRIP spray wand from pocket

- Remove wrap from coiled hose
- Remove protective battery strip from sprayer handle



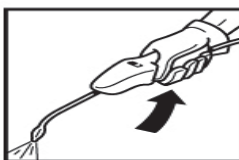
2. REMOVE STICKER & CAP COVER



3. CONNECT HOSE TO CAP

Insert plug at end of coiled hose into hole on cap and push firmly until secure.

Remove sticker and cap cover before inserting hose plug.



4 AA Batteries Included

For important battery information – see booklet.

4. OPEN SPRAY WAND

- Unfold spray wand until it snaps into place
- Point spray nozzle away from body.
- Adjust spray nozzle to desired setting.

5. TURN POWER ON

Slide OFF-ON switch to ON position.

6. SQUEEZE

- Squeeze trigger to dispense product. Sprayer may require several seconds to prime before product is released.
- Release trigger to stop spraying.

Storage

- Slide OFF-ON switch to OFF position.
- Do not unplug hose. Leave connected to cap.
- Turn spray nozzle to the off position.
- Fold spray wand down against sprayer handle.
- Return ERGO-GRIP spray wand to pocket for storage.

To Replace Batteries

- Open battery compartment [with a small screwdriver].
- Remove used batteries and replace with new batteries in correct position as indicated inside battery compartment.
- Securely close battery compartment door [and screw closed].

Proper use of Batteries

- Never mix old batteries with new.
- Do Not mix Alkaline with Standard (carbon zinc) or Rechargeable (nickel cadmium) batteries.
- When storing sprayer for long periods, remove batteries to prevent leakage.
- Dispose of used batteries according to manufacturer's instructions or in household trash.

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[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
- 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][panel] label for additional [first aid] [precautionary statements]
- First aid and precautionary statements on back [booklet][label].
- See booklet for directions for use
- 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

[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

[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.]