



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 21, 2014

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

Subject: Label Amendment – Multiple revisions to label including addition of several pests  
Product Name: Pyrol-O RTU  
EPA Registration Number: 67702-35  
Application Date: 9/25/14  
Decision Number: 496497

Dear Mr. Talarek:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing 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 copy of the final printed labeling before you release the 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 the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements 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 Agency 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.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, you may contact Elizabeth Fertich at 703-347-8560 or via email at Fertich.elizabeth@epa.gov.

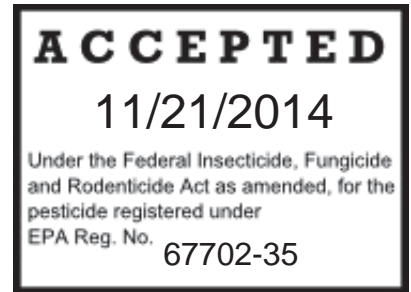
Sincerely,

A handwritten signature in black ink, appearing to read 'Kable Bo Davis', enclosed within a hand-drawn oval.

Kable Bo Davis, Product Manager 3  
Invertebrate and Vertebrate Branch 1 (IVB1)  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

# Pyrol-O RTU



Active Ingredients	By Wt.
Pyrethrins .....	0.01%
Canola Oil .....	1.00%
<b>Other Ingredients</b> .....	<u>98.99%</u>
<b>Total</b>	100.00%

This product contains 0.0824 lbs. of canola oil and 0.0008 lbs. of pyrethrins per gallon.

## KEEP OUT OF REACH OF CHILDREN CAUTION

NET CONTENTS: 16 fl. oz., 22 fl. oz., 24 fl. oz., 32 fl. oz, 1 gallon

EPA Registration No: 67702-35

EPA Establishment No. 67702-

### PRECAUTIONARY STATEMENTS

**Environmental Hazards:** This product is toxic to aquatic organisms including fish and invertebrates. To protect the environment, do not allow the 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.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the area.

Physical or Chemical Hazards: Combustible. Do not use or store near heat or open flame.

### HOTLINE NUMBER

Have the product container or label with you when calling a poison control center of doctor, or going for treatment. . [For emergency information concerning this product, call the poison control center 1-800-222-1222. [Alternately insert subregistrant's toll free number and hours of operation].]

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read entire label. Use only as directed. Shake well before each use.

### Use Restrictions

- Do not make any applications during rain.
- Do not water the treated area to the point of run-off.
- Do not wet plants to point of runoff or drip.
- Do not allow adults, children or pets to enter the treated area until sprays have dried.

- Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.
- Remove pets, birds, and cover fish aquariums before spraying.
- Do not apply within 21 days of a sulfur application.
- Do not use PYROL-O RTU spray when temperatures are above 90°F.
- Do not apply more than 10 times per season.
- Do not reapply within 3 days except under extreme pest pressure.
- Do not apply more than 1 time per day.
- In case of extreme pest pressure do not reapply within 24 hours.
- Do not apply directly into sewers or drains, or to any area like a gutter where drainage to storm sewers, water bodies or aquatic habitat can occur. Do not allow the product to enter any drain during application.
- Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.
- Other than applications to building foundations, all applications to impervious surfaces, such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.
- To prevent product run-off, do not over water treated areas(s) or apply prior to heavy rainfall.

**Phytotoxicity Note:**

Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

**APPLICATION INSTRUCTIONS**

Thoroughly wet all parts of the plants. Do not wet plants to point of runoff or drip. Repeat treatment in 1-2 weeks if needed. Do not apply more than 20 fl. oz. per 100 square feet per application. May be used on edible crops up to and including day of harvest.

**PESTS/SITES**

PYROL-O RTU kills exposed: Adelgids, Ants (including Foraging Ants, Sweet-Feeding Ants, Pavement Ants, Moisture Ants, Little Black Ants, Argentine Ants, Crazy Ants, Acrobat Ants, Bigheaded Ants, Cornfield Ants, Ghost Ants, Odorous House Ants, Thief Ants, Texas Leafcutting Ants, Field Ants, and other Common Ants) (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants), Aphids (including Green Peach Aphids), Armyworms (including Beet Army Worms, Western Yellow Striped Armyworms), Bagworms, Beetles (Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Blister Beetles, 12-spotted Cucumber Beetles, Cucumber Beetle, Darkling Beetles (lesser mealworm), Saw-toothed Grain Beetles, Elm Leaf Beetles, Bean Beetles, Mexican Bean Beetles), Borers (including European Corn Borer, Branch and Twig Borers, Shot hole borers and Pacific flathead borers), Box Elder Bugs, Cabbageworms (including Cross-striped Cabbageworm and Imported Cabbageworm), Cankerworms, Caterpillars (Gypsy Moth Caterpillars, Tent Caterpillar, Eastern Tent Caterpillar, Forest Tent Caterpillar and Tomato Fruitworm Caterpillar), Corn Earworms, Crane Flies, Crickets, Diamondback Moth Larvae, Earwigs, Fireworms, Fungus Gnats, Fruit Flies (Including Cherry Fruit Fly), Glassy Winged Sharpshooter, Grape Leaf Skeletonizer, Grasshoppers, Green Fruit Worm, Harlequin Bugs, Hornworms (including Tomato Hornworm), Katydid, Lace Bugs, Leafhoppers (including Grape Leafhopper, and Potato Leafhoppers), Leafminers, Leafrollers (including Fruittree Leafrollers), Leaf-tiers, Loopers (including Cabbage Looper), Lygus, Maggots (including Apple Maggot, Cabbage Maggots, and Onion

Maggot), Mealybugs (including Citrus Mealybugs, Grape Mealybugs and Vine Mealybugs), Non-biting Midges, Millipedes, Mites (including Clover Mites, European Red Mite and Spider Mites), Moths (including Artichoke Plume Moth, Codling Moth, Diamondback Moth, European Pine Tip Moth, Gypsy Moths, Indian Meal Moth, Mediterranean Flour Moth), Mushroom Flies, Navel Orangeworm, , Plant Bugs (including Leaf footed Plant Bug, Tarnished Plant Bug), Psyllids (including Pear Psyllids), Sawfly Larvae (pear and rose slugs), Scale insects (including Soft Scale and Armoured Scale), Silverfish, Skippers, Sowbugs, Spittlebugs, Squash Bugs, Stink Bugs, Thrips (including Greenhouse Thrips), Vinegar Flies, Webworms, Weevils (including Boll Weevil, Carrot Weevil, Clover Weevil, Rice Weevil, Pepper Weevil), Whitefly and Phylloxera.

[The registrant may use one of the two statements:

**VEGETABLES AND HERBS:** Use as directed above on vegetables and herbs such as asparagus, beans, broccoli, Brussels sprouts, cabbage, cauliflower, kale, oriental vegetables, herbs, lettuce, eggplant, peppers, tomatoes, potatoes, cucumbers, melons and squash.

**FRUITS AND NUTS:** Use as directed above on fruits and nuts such as apples, avocados, citrus (grapefruit, lemons, oranges, tangerines, limes), peaches, nectarines, apricots, pears, almonds, pecans, walnuts, kiwi fruit, blackberries, loganberries, raspberries, strawberries, strawberries and grapes.

**ORNAMENTAL TREES AND SHRUBS:** Use as directed above on ornamental trees and shrubs such as azaleas, birch, camellias, dogwood, holly, rhododendrons, evergreens and shade trees. See PHYTOTOXICITY section for additional use restrictions.

**FLOWERS:** Use as directed above on flowers such as asters, carnations, chrysanthemums, geraniums, marigolds, petunias and roses.

**HOME GREENHOUSE USE:** Use as directed above in home greenhouses on flowering and foliage plants; vegetables and fruits.

**INDOOR USE:** For use indoors on houseplants as directed above.

**DORMANT USE:** Kills exposed egg stages of pests present in dormant season and pests on dormant shrubs (roses), evergreens, fruit trees and shade trees. Thoroughly wet the dormant plants or trees.

OR

#### SITES

**VEGETABLES AND HERBS:** asparagus, beans, broccoli, Brussels sprouts, cabbage, cauliflower, kale, oriental vegetables, herbs, lettuce, eggplant, peppers, tomatoes, potatoes, cucumbers, melons and squash.

**FRUITS AND NUTS:** apples, avocados, citrus (grapefruit, lemons, oranges, tangerines, limes), peaches, nectarines, apricots, pears, almonds, pecans, walnuts, kiwi fruit, blackberries, loganberries, raspberries, strawberries, strawberries and grapes.

**ORNAMENTAL TREES AND SHRUBS:** azaleas, birch, camellias, dogwood, holly, rhododendrons, evergreens and shade trees. See PHYTOTOXICITY section for additional use restrictions.

**FLOWERS:** asters, carnations, chrysanthemums, geraniums, marigolds, petunias and roses.

GREENHOUSES: flowering and foliage plants; vegetables and fruits.

INDOORS: Houseplants

DORMANT USE: Kills exposed egg stages of pests present in dormant season and pests on dormant shrubs (roses), evergreens, fruit trees and shade trees. ]

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Keep this product in its tightly closed original container, when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING & DISPOSAL:** Nonrefillable 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:**

[The registrant may use one or more of these optional statements:

**“NOTICE TO BUYER**

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for 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

[The] (Insert Company Name) Guarantee- If for any reason you are not satisfied with this product, send proof of purchase to the address shown and we will gladly refund your purchase price.”

OR

Satisfaction guaranteed

OR

Unconditionally guaranteed

OR

Money back guarantee

[Marketing claims and product information that may be presented on the container or supplemental labeling:

- Dormant and growing season insect spray to kill exposed adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, mites, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Dormant and growing season insect spray
- (Kills)(Controls) (Use to kill) [Insert any or all of the following:] (Adelgids), (Ants (including Foraging Ants, Sweet-Feeding Ants, Pavement Ants, Moisture Ants, Little Black Ants, Argentine Ants, Crazy Ants, Acrobat Ants, Bigheaded Ants, Cornfield Ants, Ghost Ants, Odorous House Ants, Thief Ants, Texas Leafcutting Ants, Field Ants, and other Common Ants) (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)), (Aphids), (Green Peach Aphids), (Armyworms), (Beet Army Worms), (Western Yellow Striped Armyworms), (Bagworms), (Beetles), (Colorado Potato Beetle), (Flea beetle), (Japanese Beetle), (Asparagus Beetle), (Blister Beetles), (12-spotted Cucumber Beetles), (Cucumber Beetle), (Darkling Beetles), (Saw-toothed Grain Beetles), (Elm Leaf Beetles), (Bean Beetles), (Mexican Bean Beetles), (Borers),(European Corn Borer), (Branch and Twig Borers), (Shot hole borers), (Pacific flathead borers), (Box Elder Bugs), (Cabbageworms), (Cross-striped Cabbageworm), (Imported Cabbageworm), (Cankerworms), (Caterpillars), (Gypsy Moth Caterpillars), (Tent Caterpillar), (Eastern Tent Caterpillar), (Forest Tent Caterpillar), (Tomato Fruitworm Caterpillar), (Corn Earworms), (Crane Flies), (Crickets), (Diamondback Moth Larvae), (Earwigs), (Fireworms), (Fungus Gnats), (Fruit Flies), (Cherry Fruit Fly), (Glassy Winged Sharpshooter), (Grape Leaf Skeletonizer), (Grasshoppers), (Green Fruit Worm), (Harlequin Bugs), (Hornworms), (Tomato Hornworm), (Katydid), (Lace Bugs), (Leafhoppers), (Grape Leafhopper), (Potato Leafhoppers), (Leafminers), (Leafrollers), (Fruittree Leafrollers), (Leaftiers), (Loopers), (Cabbage Looper), (Lygus), (Maggots) (Apple Maggot), (Cabbage Maggots), (Onion Maggots), (Mealybugs), (Citrus Mealybugs), (Grape Mealybugs), (Vine Mealybugs), (Non-biting Midges), (Millipedes), (Mites), (Clover Mites), (European Red Mite), (Spider Mites), (Moths), (Artichoke Plume Moth), (Codling Moth), (Diamondback Moth), (European Pine Tip Moth), (Gypsy Moths), (Indian Meal Moth), (Mediterranean Flour Moth), (Mushroom Flies), (Navel Orangeworm), (Plant Bugs), (Leaf footed Plant Bug), (Tarnished Plant Bug), (Psyllids), (Pear Psyllids), (Sawfly Larvae (pear and rose slugs)), (Scale) (Soft Scale), (Armoured Scale), (Silverfish), (Skippers), (Sowbugs), (Spittlebugs), (Squash Bugs), (Stink Bugs), (Thrips), (Greenhouse Thrips), (Vinegar Flies), (Webworms), (Weevils), (Boll Weevil), (Carrot Weevil), (Clover Weevil), (Rice Weevil), (Pepper Weevil), (Whitefly), (Phylloxera) (and other listed insect pests).
- (Kills)(Controls)(Use to kill) (adelgids), (Ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)), (Aphids ),( Armyworms), (Bagworms), (Beetles), (Borers), (Cabbage Looper), (Cabbageworms), (Cankerworms), (Caterpillars), (Crane Flies), (Crickets), (Diamondback Moth Larvae), (Earwigs), (Fireworms), (Fungus Gnats), (Fruit Flies), (Glassy Winged Sharpshooter), (Grape Leaf Skeletonizer), (Green Fruit Worm), (Harlequin Bug), (Hornworms), (Katydid), (Lace Bugs), (Leafhoppers), (Leafminers), (Leaftiers), (Loopers), (Leafrollers), (Lygus), (Maggots),(mealybugs), (Non-biting Midges), (Millipedes), (Mites), (Moths ), (Mushroom Flies), (Navel Orangeworm), (Phylloxera), (Psyllid), (Scale), (Vinegar Flies), (Webworms), (Weevils), (Whiteflies), (Phylloxera) (and other listed insect pests).
  - For indoor and outdoor use
  - (Controls)(Kills) 100+ (listed) (insects) (on contact)
  - (Multi-Action:) Kills all stages of listed insects, including eggs.
  - Kills listed insects on contact
  - Indoor and Outdoor
  - Includes new continuous spray technology
  - Kills Japanese Beetles (on contact)
  - Patented formulation.

- Patented formula
- Patent #5,700,473
- Kills all accessible stages of listed insects, including eggs.
- Contact insecticide, ovicide.
- Kills insects on contact
- Kills insects, including beetles, caterpillars and aphids.
- Kills aphids, beetles (Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle), caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers), ants (except Fire Ants, Harvester Ants, Carpenter Ants and Pharaoh Ants), mealybugs, mites, leafhoppers, scale insects, whitefly, adelgids, plant bugs, fungus gnats, thrips, sawfly larvae, psyllids, spittlebugs, and phylloxera.
- For use on: vegetables, fruits, ornamentals, shrubs, trees and houseplants
- Use on flowers, shrubs, fruits and vegetables
- Effective on listed soft and hard bodied insects
- Dual action
- Dual Killing Action
- Broad Spectrum (insecticide)
- Kills all stages of insect growth- egg to adult
- Kills (insect) eggs, larvae and adults
- Kills insects- eggs to adults
- Kills mites, whiteflies, aphids, and all accessible stages of listed insects & eggs
- For roses, flowers & vegetables
- Contains pyrethrins and canola oil botanical insecticides.
- For use on plants-indoors and outdoors
- For use in and around the home
- For use in and around homes and home greenhouses
- For indoor and outdoor uses
- Indoor and outdoor
- Can use on (flowers), (vegetables), (fruits) and (roses)
- Easy to use
- Insecticide/miticide
- Insect spray
- Roses and flowers
- Houseplants and gardens
- Fruits and vegetables
- PYROL-O RTU is a contact killer for both listed insect and listed mite pests.
- Contact insecticide
- For best results, pests must be contacted directly with spray.
- Fast-acting
- Kills listed insects on contact
- Kills listed bugs on contact
- Read entire container label before using this product
- May be used up to and including day of harvest.
- Can be used up to and including day of harvest
- Use up to day of harvest



- Pyrol™ is a trademark of W. Neudorff GmbH KG
- Manufactured. Distributed by: (insert company name)
- Made in/Produced in: \_\_\_\_\_ (from US and imported products/parts)
- See back (booklet) label for first aid
- This container is made with a minimum X% recycled material
- Manufactured under [a] license of W. Neudorff GmbH KG[, Germany]
- Sold under a license of W. Neudorff GmbH KG, Germany
- Designed for Independent Retailers
- 
- Superscript is first letter of lot number



For Organic Gardening



-Listed by the Organic Materials Review Institute (OMRI) for use in gardening of organic food and fiber

-Listed by the Organic Materials Review Institute (OMRI) for use in organic gardening



Registrant: W. Neudorff GmbH KG,  
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31860 Emmerthal, Germany  
Phone: 250-652-5888  
[www.neudorffpro.com](http://www.neudorffpro.com)