



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
EPA Registration Number: 67702-36
Application Date: 9/25/14
Decision Number: 496496

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,

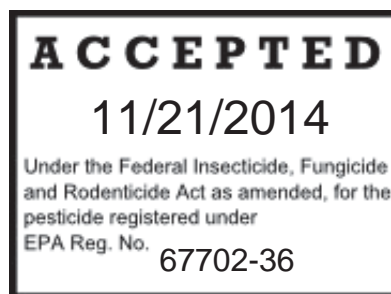
A handwritten signature in black ink, appearing to read 'Kable Bo Davis', enclosed within a hand-drawn oval.

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

Enclosure

Pyrol-O

Active Ingredients	By Wt.
Pyrethrins	0.50%
Canola Oil	89.00%
Other Ingredients.....	<u>10.0%</u>
Total	100.0%



[The registrant may use one of these statements, either

This product contains 6.837 lbs. of canola oil and 0.038 lbs. of pyrethrins per gallon.

OR

This product contains 0.854 lbs. of canola oil and 0.005 lbs. of pyrethrins per pint.

OR

This product contains 1.708 lbs. of canola oil and 0.01 lbs. of pyrethrins per quart.]

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS: 16 fl. oz., 24 fl. oz., 32 fl. oz., 1 gallon (128 fl. oz), 200 gallons and 211 gallons (800 liters)

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EPA Establishment #

FIRST AID	
IF ON SKIN OR CLOTHING	-Take off contaminated clothing. -Rinse skin immediately with plenty of water for 15-20 minutes. -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. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concern), you may call 1-XXX-XXX-XXXX, 24 hours per day, 7 days per week. [insert the days and hours of operation if this number is less than 7 days a week, 24 hours a day and the following sentence: After [insert time after which number may not be called] call your poison control center at 1-800-222-1222.]	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Avoid contact with skin or clothing. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

User Safety Recommendations

- Users should wash hands with plenty of soap and water before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read entire label before use. 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 spray when temperatures are above 90°F.
- 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, 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.
- Do not apply more than 10 times per season.
- Do not reapply within 3 days except under extreme pest pressure.
- In case of extreme pest pressure do not reapply within 24 hours.
- Not for use in outdoors residential misting systems.

Phytotoxicity Note:

Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Use a 1% solution on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar and Smoke Tree. Use care on blooms and buds. Test spray a portion of the plant and wait several days to determine if burn occurs before spraying larger areas. Some plants are sensitive to this product. If in doubt, test-spray a small portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

APPLICATION DIRECTIONS

[The registrant may use one of these application directions, either

For a 1% solution mix 2 teaspoons of concentrate with 1 quart (32 fl. oz) water, or 1 fl. oz. concentrate with 3 quarts (96 fl. oz.) water. For a 2% solution mix 4 teaspoons of concentrate with 1 quart (32 fl. oz) water, or 2 fl. oz. concentrate with 3 quarts (96 fl. oz.) water. Shake well before each use and stir or shake diluted spray frequently during use.

Apply at a rate of 1% or 2% solution. For soft-bodied pests such as aphids and mites, a 1% solution is sufficient. Using hand-held trigger sprayers, hand sprayers or backpack sprayers, thoroughly spray insect pests with diluted product until all parts of plants are wet. Do not wet plants to point of runoff or drip. Repeat treatment in 1-2 weeks if needed. May be used on edible fruits and vegetables up to and including day of harvest.

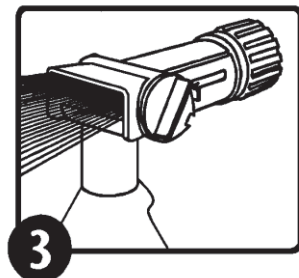
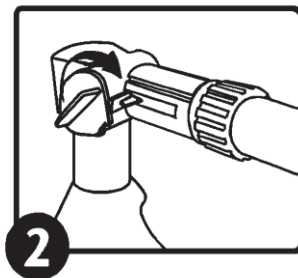
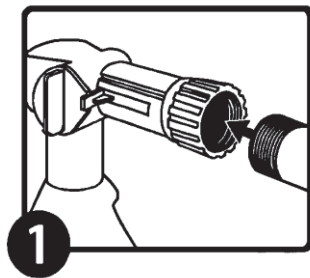
OR

Using the following (hose end sprayer), (applicator) instructions thoroughly spray insect pests with diluted product until plants are wet. Do not wet plants to point of runoff or drip. Repeat treatment in 1-2 weeks if needed. May be used on edible fruits and vegetables up to and including day of harvest.

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to “water”.
3. Point nozzle toward plants and turn water control knob to “On”. Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H₂O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.



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PESTS/SITES

PYROL-O will kill: 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.

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. Do not apply more than 4 fl. oz. of concentrate (400 fl. oz. of 1% solution or 200 fl.oz. of 2% solution) per 1000 square feet.

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. Do not apply more than 4 fl. oz. of concentrate (400 fl. oz. of 1% solution or 200 fl. oz. of 2% solution) per 1000 square feet.

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. Do not apply more than 4 fl. oz. of concentrate (400 fl. oz. of 1% solution or 200 fl.oz. of 2% solution) per 1000 square feet. See **PHYTOTOXICITY** section for additional use restrictions.

FLOWERS: Use as directed above on flowers such as asters, carnations, chrysanthemums, geraniums, marigolds, petunias and roses. Do not apply more than 4 fl.

oz. of concentrate (400 fl.oz. of 1% solution or 200 fl.oz. of 2% solution) per 1000 square feet.

GREENHOUSE USE: For use in home greenhouses on flowering and foliage plants; vegetables and fruits. Do not apply more than 4 fl. oz. of concentrate (400 fl.oz. of 1% solution or 200 fl. oz. of 2% solution) per 1000 square feet.

DORMANT USE: Kills egg stages of pests present in dormant season and pests on dormant shrubs (e.g., roses), evergreens, fruit trees and shade trees. Apply a 2% solution. Thoroughly wet the dormant plants or trees. Do not apply more than 4 fl.oz of concentrate (400 fl.oz. of 1% solution or 200 fl.oz. of 2% solution) per 1000 square feet.

HOUSEPLANTS: For use on houseplants. Do not apply more than 4 fl.oz of concentrate (400 fl.oz. of 1% solution or 200 fl.oz. of 2% solution) per 1000 square feet.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or 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 refill or reuse 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 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 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

- Satisfaction guaranteed

OR

- Unconditionally guaranteed

OR

- Money back guarantee]

[Marketing claims and product information that may or may not be presented on the container or label:

- Dormant and growing season insect spray to kill 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), (Katydids), (Lace Bugs), (Leafhoppers), (Grape Leafhopper), (Potato Leafhoppers), (Leafminers), (Leafrollers), (Fruittree Leafrollers), (Leaf tiers), (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), (Katydids), (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
- Patent #5,700,473
- Kills all accessible stages of listed insects, including eggs.
- Contact insecticide, ovicide.
- Fast acting-kills on contact
- Contains pyrethrins and canola oil botanical insecticides.
- Easy to use
- Insecticide/miticide
- 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
- Kills Japanese Beetles (on contact)
- 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
- PYROL-O is a contact killer for listed insect and mite pests.

- For best results, pests must be contacted directly with spray.
- Pyrol™ is a trademark of W. Neudorff GmbH KG
- Sold under a license of W. Neudorff GmbH KG, Germany
Manufactured under a license of W. Neudorff GmbH KG, Germany



- May be used up to day of harvest
- May be used on edible fruits and vegetables up to and including day of harvest
- Can be used right up until day of harvest.
- Use up to day of harvest
- Read Entire Container Label Before Using This Product
- Roses and flowers
- Gardens
- Fruits and vegetables
- Can be used in vegetable gardens
- For use in and around the home
- For use in and around homes and home greenhouses
- For Indoor and Outdoor Uses
- Indoor and Outdoor
- [For 16. fl. oz container] Makes over 12 gallons of spray
- [For 24 fl. oz. container] Makes over 18 gallons of spray
- [For 32 fl. oz container] Makes up to 25 gallons of spray
- [For 1 gallon container] Makes up to 100 gallons of spray]



For Organic Gardening



For Organic Use

- 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
An der Muhle 3, Postfach 1209
31860 Emmerthal, Germany