



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 12, 2023

Walter G. Talarek
W. Neudorff GmbH KG
c/o Walter G Talarek, PC
5153 Allison Marshall Drive
Warenton, VA 20187

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment –Addition of Mixing Instruction and Correction of Application Rate
Product Name: FireWorxx 80
EPA Registration Number: 67702-54
Application Date: 3/07/2023
Action Code Case Number: 00439666

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

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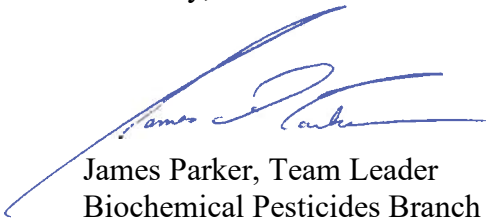
OPP Decision No. 00439666

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 Chris Pfeifer of my team by phone at (703) 244-7991 or via email at pfeifer.chris@epa.gov.

Sincerely,



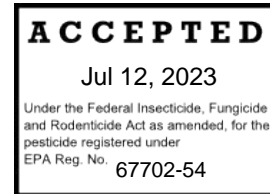
James Parker, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

Text in braces { } is for information only and will not appear on label.
Text in brackets [] is optional and may or may not appear on the label.
Text in parentheses () will appear on the label.

{MASTER LABEL

FireWorxx 80
[ABN:H06 Non-Selective Herbicide]
[ABN: Lava]
[ABN: Homeplate]
[ABN: Homeplate Total Vegetation Killer]



Active Ingredients:	
Caprylic Acid	45.14%
Capric Acid	34.76%
Other Ingredients:	20.10%
Total:	100.00%

(C8/C10 Fatty Acid blend = 79.9%)

SUBLABEL A: Home and Garden Use
SUBLABEL B: Commercial Agricultural Use

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA REG. NO. 67702-54

EPA EST. NO.

Registrant: W. Neudorff GmbH KG
An der Muhle 3,
31860 Emmerthal, Germany

Home and Garden Use: NET CONTENTS: 2 fl. oz., 4 fl. oz., 8 fl. oz., 16 fl. oz., 27 fl. oz., 32 fl. oz., 54 fl. oz, 64 fl. oz., 1 gallon, 130 oz. , 55 gallon, 200 gallon, 211 gallon (800 Liters) and 250 gallon

Commercial Agriculture Use: NET CONTENTS: 1 gallon, 2.5 gallon, 5 gallon, 30 gallon, 50 gallon, 55 gallon, 200 gallon, 211 gallon (800 Liters) and 250 gallon}

{SUBLABEL A: Home and Garden Use}

FireWorxx 80
[ABN:H06 Non-Selective Herbicide]
[ABN: Lava]
[ABN: Homeplate]

Active Ingredients:

Caprylic Acid _____	45.14%
Capric Acid _____	34.76%
Other Ingredients: _____	20.10%
Total: _____	100.00%

(C8/C10 Fatty Acid blend = 79.9%)

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA REG. NO. 67702-54 EPA EST. NO.

NET CONTENTS: 2 fl. oz., 4 fl. oz., 8 fl. oz., 16 fl. oz., 27 fl. oz, 32 fl. oz., 54 fl. oz, 64 fl. oz., 1 gallon, 130 oz., 55 gallon, 200 gallon, 211 gallon (800 Liters) and 250 gallon

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
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 emergency information concerning this product, call the poison control center 1-800-222-1222 [alternately insert subregistrant's toll free number]].	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear eye protection (goggles, face shield or safety glasses) and waterproof gloves.

Wash thoroughly with soap and water after handling, and before eating, chewing gum, using tobacco or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. 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.

DIRECTIONS FOR USE

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

{One of the following two sections must be used. The second set of directions is to be used when labelling for refill of EPA Reg. No. 67702-59/ Homeplate RTU bottle}

[Application Directions

Shake well before using. Dilute with water using the chart below as a guide. Use the 3% solution for small, easy-to-kill weeds, less than 5 inches tall, and for moss and algae. Use the 6% solution for larger perennial weeds and grasses. Use the 9% solution for tough to kill weeds, vines, brush and sucker control. Apply the mixed solution at 2.5 – 7.5 gallons/1,000 ft² (3 – 9 fl. oz./yard²). Any standard hand-held or backpack sprayer can be used. Spray weed thoroughly, using a coarse nozzle setting to reduce drift. Thorough coverage is extremely important. For spot treatment of individual weeds, apply the mixed solution to the center of plant to the point of runoff. Plant damage will be visible from a few hours to 2 days after spraying. Repeat treatment every 2 to 3 weeks to control new weeds growing from seed and re-growth from biennial and perennial weeds. Avoid spraying desirable plants. Thoroughly wash equipment after use.

Desired volume of spray solution	Amount of Fireworxx 80 [this product] [product name] per volume of water		
	3% solution	6% solution	9% solution
1 quart (32 fl. oz.)	1 fl. oz.	2 fl. oz.	3 fl. oz.
1 gallon (128 fl. oz.)	4 fl. oz.	8 fl. oz.	12 fl. oz.

]

OR

[

[[Mixing Instructions:] Pre-measured bottle. Pour into refill container and dilute with water to refill the (Homeplate RTU, EPA Reg. No. 67702-59) container.]

Refill Instructions: Do not refill or reuse this container. This product can be diluted with water to refill an empty (Homeplate RTU, EPA Reg. No. 67702-59 Homeplate RTU) container.]

[[For [Fireworxx 80][Product name] general refill:]] To refill empty [Homeplate RTU] [Product name] container [with Fireworxx 80], [Product name], [this product], add 1 fl. oz. (2 tablespoon) of [Fireworxx 80] [Product name] [this product] for every 17 fl. oz. of clean water. Use as directed on the [Homeplate RTU], [Product name] label, EPA Reg. No. 67702-xx.]

[[1 quart refill instructions (2 fl. oz [Fireworxx 80] [Product name]):]] To refill empty [Homeplate RTU] [Product name] 1 quart container add [2 fl. oz. (4 tablespoons)] [Entire contents of bottle (2 fl. oz.)] of [Fireworxx 80] [Product name] [this product] for every 30 fl. oz. of clean water. Use as directed on the [Homeplate RTU] [product name] label, EPA Reg. No. 67702-59.]

[[64 fl. oz. refill instructions (4 fl. oz [Fireworxx 80] [Product name]):]] To refill empty [Homeplate RTU] [Product name] 64 oz container add [4 fl. oz. (8 tablespoons)] [Entire contents of bottle (4 fl. oz.)] of [Fireworxx 80] [Product name] [this product] for every 60 fl. oz. of clean water. Use as directed on the [Homeplate RTU] [product name] label, EPA Reg. No. 67702-59.]

[[1 gallon refill instructions (8 oz [Fireworxx 80] [Product name]):]] To refill empty [Homeplate RTU] [Product name] 1 gallon container add [8 fl. oz. (16 tablespoons)] [Entire contents of bottle (8 fl. oz.)] of [Fireworxx 80] [Product name] [this product] for every 120 fl. oz. of clean water. Use as directed on the [Homeplate RTU] [product name] label, EPA Reg. No. 67702-59.]

[[1.33 gallon refill instructions (10 oz [Fireworxx 80] [Product name]):]] To refill empty [Homeplate RTU] [Product name] 1.33 gallon container add [10 fl. oz. (20 tablespoons)] [Entire contents of bottle (10 fl. oz.)] of [Fireworxx 80] [Product name] [this product] for every 160 fl. oz. of clean water. Use as directed on the [Homeplate RTU] [product name] label, EPA Reg. No. 67702-59.]

Application Directions

Once diluted, shake well before using. Spray weeds thoroughly, using a coarse nozzle setting to reduce drift. Thorough coverage is extremely important. For spot treatment of individual weeds, apply the mixed solution to the center of plant to the point of runoff. Plant damage will be visible from a few hours to 2 days after spraying. Repeat treatment every 2 to 3 weeks to control new weeds growing from seed and re-growth from biennial and perennial weeds. Avoid spraying desirable plants. Thoroughly wash equipment after use.]

]

Product Information:

This product is a fast-acting, non-selective broadleaf weed, grass, algae and moss killer. This product is not translocated. It will burn only those plant parts that are coated with spray solution. This product can be used any time during the year and works best during warm and dry conditions. Application during cold weather may delay appearance of plant damage. If rain falls within 3 hours of treatment, an additional

spray may be required. This product controls many common annual weeds and suppresses the growth of some biennial and perennial weeds. It can be used in cultivated areas prior to planting grass, flowers and vegetables. Areas can be re-planted as soon as desirable level of weed control is obtained.

Use Sites:

Use on visible weeds within vegetable and flower gardens, landscaped areas, and lawns and weeds in the vicinity of small fruits, vines and fruit trees.

Use on visible weeds around and on buildings, sidewalks, fences, bark mulch, driveways, patios and gravel.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store unused material, tightly closed, in original container only, away from open flame. Do not store at temperatures below 39°F.

PESTICIDE DISPOSAL AND CONTAINER HANDLING:

If empty: Nonrefillable container. 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 following claims and product information may or may not be presented on the product's label and labeling:}

[

- non-selective herbicide
- total vegetation killer
- For household use only
- Treated surfaces may be slippery when wet.
- Eliminates unwanted vegetation quickly
- Eliminates unwanted weeds quickly
- Kills within hours
- Kills [Controls] Weeds, Grass, Algae and Moss
- For Weeds on Roofs, Decks, Patios, Walks, Bricks, and Cement
- Fast Acting [Weed, Grass, Moss and Algae Killer]
- Overspray [will] [does] not damage gutters, metal flashing or downspouts.
- Do not spray on lawns or desirable plants
- www.neudorffpro.com







- This XXX fl. oz. bottle will cover up to XXX square feet.
- Treats [will treat] up to XXX sq. ft.
- Makes XXX gallons of Finished Spray.
- Sold under a license of W. Neudorff GmbH KG, Germany.
- Manufactured under a license of W. Neudorff GmbH KG, Germany.
- For use on weeds [on] [in] [around] [along]: patios, walkways, driveways, flower beds,





vegetable gardens, shrubs, trees, fences, foundations, other areas of your yard.

-Kills all types of weeds and grasses

- See [inside][side][back][panel](attached) [booklet] for [additional] [complete] [precautionary statements], [directions for use], [first aid statements], [Storage and disposal], [use precautions] {When the first aid statement will appear on the side or back panel, the claim "See side/back panel for First Aid" will appear on the front panel}

- Refer to inside of label booklet for additional precautionary information and Directions for Use.

- For questions or comments, call [toll free] 1-XXX-XXX-XXXX [][][] [or visit us online at www.neudorff.com []]

-For emergency medical information, you may call [toll free] 1-XXX-XXX-XXXX [][][] [or visit us online at www.neudorff.com []]

- Refill

- Great value [- use to cover small or large areas]

- Value [pack/size/buy]

- Bonus [value/size/offer/package/pack/buy]

- Special [buy/offer/size/item]

- [Easy] refill [system]

- Free sample

- Combo pack

- 1 [1.33] [32 oz] gallon/gal [quart] refill size

- Easy to use [mix] [refill]

- Just add water [to make 1.33 gallon/1 gallon ready to use]

- Premeasured [refill] [bottle]

- Use with/in [product name] 1.33 gal [1 gal] trigger/wand/pull n' spray

- No Measuring, No Mess

- The value of XX [size RTU] in one concentrate

- Refill makes XX [extra] gallons

- New

- Save [money]

- Limited time offer

- X covers X sq. ft.

- XXX fl. oz. [bottle] will cover up to XXX square feet.

- Guaranteed [Results] *

*Guaranteed not to harm the lawn when used as directed

- Proven performance

- Local Solutions for Local Problems

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

- OMRI Listed



-Can be Use For Organic Gardening



For Organic gardening

]

{Optional warranty statements:}

[NOTICE (TO BUYER)]

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. Buyer assumes all risk of any such use. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied.

[OR]

Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.]

Registrant: W. Neudorff GmbH KG
An der Muhle 3,
31860 Emmerthal, Germany

{The following graphics may or may not be present on the product's label and labeling:}

[



-



]

{SUBLABEL B: Commercial Agriculture Use}

FireWorxx 80

[ABN:H06 Non-Selective Herbicide]

[ABN: Lava]

[ABN: Homeplate]

[ABN: Homeplate Total Vegetation Killer]

Active Ingredients:

Caprylic Acid _____ 45.14%

Capric Acid _____ 34.76%

Other Ingredients: _____ 20.10%

Total: _____ 100.00%

(C8/C10 Fatty Acid blend = 79.9%)

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA REG. NO. 67702-54

EPA EST. NO.

NET CONTENTS: 1 gallon, 2.5 gallon, 5 gallon, 30 gallon, 50 gallon, 55 gallon, 200 gallon, 211 gallon (800 Liters) and 250 gallon

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
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 emergency information concerning this product, call poison control center 1-800-222-1222 [alternately insert subregistrant's toll free number]	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear eye protection (goggles, face shield or safety glasses) and chemical resistant

gloves. Wash thoroughly with soap and water after handling, and before eating, chewing gum, using tobacco or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

Personal Protective Equipment (PPE) Requirements: Applicators and other handlers must wear: coveralls worn over short-sleeved shirt and short pants, socks, chemical-resistant footwear, chemical-resistant gloves, such as (such as barrier laminate, nitrile rubber, neoprene, viton)) and protective eyewear. When cleaning equipment a chemical-resistant apron should also be worn.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent materials that have been drenched or heavily

User Safety Recommendations

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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 cleaning equipment or disposing equipment washwaters or rinsate.

DIRECTIONS FOR USE

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

Do not apply this product in a manner that will contact workers or other persons, either directly or through drift. Only protected workers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Read and follow all applicable directions and precautions on this label before using.

Agricultural Use Requirements

Use this product in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), restricted-entry interval, and notification to workers. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS).

Entry-Restrictions: Do not enter or allow worker entry into treated areas during the restricted-entry interval of 24 hours.

PPE required for early-entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, wear: coveralls worn over short-sleeved shirts and short pants, socks, chemical-resistant footwear, chemical-resistant gloves and protective eyewear.

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Keep unprotected persons out of treated areas until sprays have dried.

For early reentry to treated areas and that involves contact with anything that has been treated such as plants, soil, or water, wear: coveralls, shoes, socks, and chemical-resistant gloves.

Application Directions

Shake well before using. Dilute with water using the chart below as a guide. Use the 3% solution for small, easy-to-kill weeds, less than 5 inches tall, and for moss and algae. Use the 3-6% solution for larger perennial weeds and grasses. Use the 5-9% solution for tough to kill weeds, vines, brush and sucker control, and in lettuce thinning machines. Apply the mixed solution at 0.69 – 9.2 gallons/1,000 ft² (30 – 400 gallons per acre). In situations where weed pressure is high and/or weeds are larger than 5 inches, higher volumes are advised for acceptable control. Any standard sprayer can be used, including machine and backpack. Do not apply this product by aerial application. Do not apply this product through any type of irrigation system. Spray weed thoroughly, using a coarse nozzle setting to reduce drift. Thorough coverage is extremely important. For spot treatment of individual weeds, apply the mixed solution to the center of plant to the point of runoff. Plant damage will be visible from a few hours to 2 days after spraying. Repeat treatment as needed to control new weeds growing from seed and re-growth from biennial and perennial weeds. Avoid spraying desirable plants. Thoroughly wash equipment after use.

Desired volume of spray solution	Amount of [Fireworxx 80] [this product] [insert alternate brand name] per volume of water		
	3% solution	6% solution	9% solution
1 gallon	4 fl. oz.	8fl. oz.	12 fl. oz.
5 gallons	19 fl. oz.	38 fl. oz.	58 fl. oz.
10 gallons	38 fl. oz.	77 fl. oz.	115 fl. oz.
35 gallons	1.1 gal.	2.2 gal.	3.3gal.
50 gallons	1.5 gal.	3 gal.	4.5 gal.
100 gallons	3 gal.	6 gal.	9 gal.
400 gallons	12 gal.	24 gal.	36 gal.

Tank mixing with conventional herbicides: FireWorxx 80 may be used at a 1% rate to improve the efficacy of other herbicides including glyphosate, glufosinate, cyclohexanedione, sulfonyleurea and imidazolinone. This can be used to improve control of glyphosate resistant weeds. Tank-mixed solution may be applied at a reduced rate of 0.23 – 0.34 gallons/1,000 ft² (10-15 gallons per acre). Observe all precautions on all tank mix partner labels.

Desired volume of spray solution	Amount of FireWorxx 80 per volume of water
	1% solution*
1 gallon	1.28 fl. oz.
5 gallons	6.4 fl oz.
10 gallons	12.8 fl. oz.
35 gallons	44.8 fl. oz.
50 gallons	0.5 gallon
100 gallons	1 gallon
400 gallons	4 gallons

*1% solution to be used only when tank-mixing with other herbicides

Product Information:

This product is a fast-acting, non-selective broadleaf weed, grass, algae and moss killer. This product is not translocated. It will burn only those plant parts that are coated with spray solution. This product can be used any time during the year and works best during warm and dry conditions. Application during cold weather may delay appearance of plant damage. If rain falls within 3 hours of treatment, an additional spray may be required. This product controls many common annual weeds and suppresses the growth of biennial and perennial weeds. It can be used in cultivated areas prior to planting crops. Areas can be re-planted as soon as desirable level of weed control is obtained.

Use Sites: Outdoors and Greenhouses

For use in and around all food and non-food crops, including but not limited to:

Crop Group	Crops	Use Methods
Berry and small fruits	Aronia berry; barberry; bayberry; bearberry; bilberry; blackberry; blueberry, boysenberry; buffaloberry; chokecherry; cloudberry; currant; cranberry; dewberry; elderberry; gooseberry; grape (includes raisin, table, wine); honeysuckle; huckleberry; jostaberry; Juneberry; kiwifruit; lingonberry; loganberry; mountain pepper berries; mulberry; muntries; partridgeberry; phalsa; pincherry; riberry; red and black raspberry; salal; sea buckthorn; serviceberry; strawberry; wild raspberry.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 5. Sucker Control, Pruning and Trimming

Brassica Leafy vegetables	Broccoli, Chinese broccoli, broccoli raab, broccolo; brussels sprouts; cauliflower; cavalo; Chinese cabbage (bok choy, napa); Chinese mustard; collards; kale; kohlrabi; mizuna; mustard greens; mustard spinach; rape greens; watercress.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray (annual crops)
Leafy Vegetables	Amaranth; arugula; cardoon; celery; Chinese celery; celtuce; chervil; red chicory; chrysanthemum; corn salad; cress; dandelion; dock; endive; fennel;	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application
	lettuce; orach; rhubarb; radicchio; parsley; purslane; spinach; Swiss chard.	4. Post-Harvest Spray (annual crops) 8. Lettuce thinning
Root Vegetables	Beet; sugar beet; burdock; carrot; celeriac; chervil, chicory; ginseng; horseradish; parsnip; radish; rutabaga; salsify; skirret; turnip;	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray 6. Harvest Aid and Desiccation
Tuberous and corm vegetables	Arracacha; arrowroot; artichoke; canna; bitter and sweet cassava; chayote (root); chufa; ginger; leren; potato; sweet potato; taro; turmeric; yam bean; yam.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray (annual crops) 6. Harvest Aid and Desiccation
Bulb vegetables	Chive; daylily; fritillaria; garlic; kurrat; leek; bulb lily; onion; green onion; shallot, cultivars, varieties and/or hybrids of these.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray (annual crops) 6. Harvest Aid and Desiccation
Citrus	Calamondin; citron; grapefruit; kumquat; lemon; lime; mandarin; orange; tangelo; tangerine; pummelo; uniq fruit; cultivars, varieties, and/or hybrids of these.	1. Vegetation Burndown 2. Directed and Shielded Sprays
Cucurbits	Cantaloupe; Chayote (fruit); Chinese waxgourd; citron melon; cucumber; gherkin; edible gourd; honeydew; muskmelon; pumpkin; summer squash; watermelon; winter squash (includes butternut squash, calabaza, hubbard squash, acorn squash, spaghetti squash); zucchini.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray

Cereal grains	Barley; buckwheat; corn; millet; oats; popcorn; rice†; rye; sorghum (milo); teosinte; triticale; wheat; wild rice‡	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray
Fruiting Vegetables	cocona; currant tomato; eggplant; goji berry; ground cherry; martynia; naranjilla; okra; pepino; pepper (includes bell pepper, chili pepper, cooking pepper, pimento, sweet pepper); roselle; sunberry; tomatillo; tomato; cultivars; varieties and/or hybrids of these.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray
Legumes	Beans; broad bean (fava bean); chickpea (garbanzo bean); guar; jackbean; lablab bean (hyacinth bean); lentil; pea; soybean; sword bean.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray 6. Harvest Aid and Desiccation*
Oilseed	Borage; crambe; cuphea; echium; flax seed; gold of pleasure; hare's ear mustard; lesquerella; lunaria; meadowfoam; milkweed; mustard seed; oil radish; poppy seed; rapeseed (canola); sesame; sweet rocket, Calendula; castor oil plant; chinese tallowtree; euphorbia; evening primrose; jojoba; niger seed; rose hip; safflower; stokes aster; sunflower; tallowwood; tea oil plant; vernonia; cottonseed; cotton; cultivars, varieties, and/or hybrids of these.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray 6. Harvest Aid and Desiccation**
Stalk, Stem and Leaf Petiole Vegetables	Agave; aloe vera; asparagus; bamboo, shoots; celtuce; cardoon; fiddlehead fern; fuki; kohlrabi; palm hearts; prickly pear; udo; zuiki.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray (annual crops)
Tree Nuts	Almond; beech nut; brazil nut; butternut; cashew; chestnut; chinquapin; coconut; filbert (hazelnut); hickory nut; macadamia nut; pecan; pine nut; pistachio; walnut.	1. Vegetation Burndown 2. Directed and Shielded Sprays 5. Sucker Control, Pruning and Trimming
Pome Fruits	Apples; azarole; crabapple; loquats; mayhaw; pears; quince; Cultivars, varieties and/or hybrids of these	1. Vegetation Burndown 2. Directed and Shielded Sprays 5. Sucker Control, Pruning and Trimming

Stone Fruit	Apricot; capulin; cherry; nectarine; peach; plum; plumcot; prune; sloe; cultivars, varieties, and/or hybrids of these.	1. Vegetation Burndown 2. Directed and Shielded Sprays 5. Sucker Control, Pruning and Trimming
Tropical and Subtropical Fruit	Avocado; banana; casaba; date; dragon fruit; guava; jackfruit; lychee; Spanish lime; loquat; lychee; mango; mangosteen; olive; papaya; passionfruit; pawpaw; persimmon; pineapple; plantain; pomegranate; prickly pear; sapote; soursop; star fruit; sugar apple; tamarind; white star apple.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-harvest Spray (annual crops) 5. Sucker Control, Pruning and Trimming
Herbs	Angelica; balm; basil; borage; burnet; camomile; catnip; chervil; chive; coriander (cilantro); costmary; culantro; curry; dillweed; horehound; hyssop; lavender; lemongrass; lovage; marigold; marjoram; nasturtium; parsley; pennyroyal; rosemary; rue; sage; savory; sweet bay; tansy; tarragon; thyme; wintergreen; woodruff; wormwood.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray (annual crops)
Spices	Allspice; anise; annatto; caper; caraway; cardamom; cassia; celery seed; cinnamon; clove; coriander; cumin; dill seed; fennel; fenugreek; grains of paradise; juniper berry; lovage; mace; mustard seed; nutmeg; pepper (white and black); poppy seed; saffron; vanilla.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray (annual crops)
Other Crops	coffee; cocoa; hops; mint; peanut; peppermint; quinoa; tea; tobacco; hemp.	1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 4. Post-Harvest Spray (annual crops) 5. Sucker Control, Pruning and Trimming
Nongrass animal feeds	Alfalfa, clover	1. Vegetation Burndown 3. Pre-plant Application 4. Post-Harvest Spray
Terrestrial Non-Food Crops	Ornamental herbaceous plants; ornamental lawns and turf; bedding plants; ornamental woody shrubs; vines; ornamental shade trees; Christmas trees; forestry sites.	1. Vegetation Burndown 2. Directed and Shielded Sprays 5. Sucker Control, Pruning and Trimming 7. Structural and Building Applications

Terrestrial Non-Crop Sites	For use on weeds and moss around and on buildings, sidewalks, fences, trees, bark mulch, driveways and other rights-of-ways, patios, gravel, on structures holding flowers, trees, shrubs, vines and vegetables, landscaped areas, lawns, and on and around buildings and structures, such as benches, walls, floors, and roofs in commercial, institutional, recreational, and industrial sites; railways; fallow land, forages and pastures, uncultivated land	<ol style="list-style-type: none"> 1. Vegetative Burndown 2. Directed and Shielded Sprays 5. Sucker Control, Pruning and Trimming 7. Structural and Building Applications
Greenhouse	All crops, plants and structures	<ol style="list-style-type: none"> 1. Vegetation Burndown 2. Directed and Shielded Sprays 3. Pre-plant Application 7. Structural and Building Applications

‡Do not apply when fields are flooded.

*Not for use in California

**Not for harvest aid and desiccation in California, except cotton.

Use Methods

1. Vegetation Burndown: General control of weeds, grass, algae and moss for site preparation and non-crop areas. Spot treatments may be used in crop and pasture situations. Applications may be made in and around desirable plants when contact of foliage and green bark is avoided.

2. Directed and Shielded Sprays: Applications may be made around desirable plants when contact of foliage and green bark is avoided.

3. Pre-plant Application: Prior to Emergence of Plants from Seed, Perennial Rootstocks, and Bulbs, Tubers etc. Ensure applications are made before new growth or crop emerges from soil or damage will occur.

4. Post-Harvest Spray: To control weeds, grass, moss and algae growing in fields after the commodity has been harvested.

5. Sucker Control, Pruning and Trimming: To burn back and control epicormic shoots, sucker growth, and other unwanted growth on woody trees, foliage growth on vines, excessive cane growth in brambles, or other listed use sites. Apply only to unwanted vegetative parts. Apply before suckers become woody.

6. Harvest Aid and Desiccation: To remove leaves of plants prior to harvest and/or burndown of weeds to facilitate harvest. Harvest aid and desiccation uses include applications to root and tuber vegetables, bulb vegetables, seed crops and cotton. Applications must be made at least 24 hours prior to harvest to ensure full burndown.

7. Structural and Building Applications: To control weeds, grass, moss and algae in and

around buildings and structures, such as benches, walls, floors, and roofs, on farmsteads and in areas used for agricultural production.

8. Lettuce thinning: For use on lettuce to chemically thin unwanted lettuce plants. Use in the spring or the fall. Applications must be made with a mechanical sprayer designed for thinning lettuce. The machine must accurately spray unwanted plants without injuring desirable lettuce plants. Good coverage of unwanted plants is essential to assure their removal. Apply after all the lettuce has emerged but before lettuce is 4 inches for accurate thinning. Do not use after lettuce is taller than 4 inches. Avoid spray drift to desirable lettuce plants and other non-target areas. Use a 5% to 9% solution for lettuce thinning.

STORAGE AND DISPOSAL

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

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. Product may be damaged by freezing. Do not store product below 39°F. If spilled, use absorbent materials and dispose of in an approved manner.

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:

{For containers equal to or less than 5 gallons use these directions on final, printed label):}

[Nonrefillable container. Do not reuse or refill this container. Triple rinse container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available.]

{For containers greater than 5 gallons use these directions on final, printed label):}

[Nonrefillable container. Do not reuse or refill this container. Triple rinse container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling, if available.]

BATCH CODE

{The following claims and product information may or may not be presented on the product's label and labeling:}





[





- The active ingredient in this product is exempt from the requirement of a tolerance when in or on all food commodities
- Treated surfaces may be slippery when wet.
- non-selective herbicide
- total vegetation killer
- Burndown herbicide

- Fatty acid herbicide
- Contact spray to [control] [burndown] weeds
- Eliminates unwanted vegetation quickly
- Eliminates unwanted grasses and broadleaf weeds quickly
- Fast acting
- Minimal foaming
- Safe for vegetation removal around an under [permanent plantings], [trees], [perennial crops]
- Non-systemic
- Kills within hours
- Kills [Controls] Weeds, Grass, Algae and Moss
- For Weeds and Moss On Roofs, Decks, Patios, Walks, Bricks, and Cement
- Fast Acting [Weed, Grass, Moss and Algae Killer]
- Overspray [Will] [Does] not damage gutters, metal flashing or downspouts.
- Do not spray on lawns or desirable plants
- www.neudorffpro.com



- Treats [will treat] up to XXX sq. ft.
- 3 gallons treats 1 acre
- Makes XXX gallons of finished spray.
- Sold under a license of W. Neudorff GmbH KG, Germany.
- Manufactured under a license of W. Neudorff GmbH KG, Germany.
- For use on weeds and moss [on] [in] [around] [along]: fields prior to planting, between the rows of field crops, around perennial plants, under mature trees and vines
- For use [on] [in] [around] [along]: patios, walkways, driveways, flower beds, vegetable gardens, shrubs, trees, fences, foundations, other areas of your yard.
- Kills all types of weeds and grasses
- See [inside][side][back][panel](attached) [booklet] for [additional] [complete] [precautionary statements], [directions for use], [first aid statements], [Storage and disposal], [use precautions] {When the first aid statement will appear on the side or back panel, the claim "See side/back panel for First Aid" will appear on the front panel}
- Refer to inside of label booklet for additional precautionary information and Directions for Use.

- For questions or comments, call [toll free] 1-XXX-XXX-XXXX    [or visit us online at www.neudorff.com 

-For emergency medical information, you may call [toll free] 1-XXX-XXX-XXXX    [or visit us online at www.neudorff.com 

- Listed by the Organic Materials Review Institute (OMRI) for organic production
- OMRI Listed



Can Be Used In Organic Production



-For Organic Production

]

{Optional warranty statements:}

[NOTICE (TO BUYER)

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. Buyer assumes all risk of any such use. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied.

{OR}

Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.]

Registrant: W. Neudorff GmbH KG
An der Muhle 3,
31860 Emmerthal, Germany