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Systems Integration Group, Inc.

pjm 91

70051-2

4/15/99

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 15 1999

Ms. Christine Dively
 Director of Regulatory Affairs
 Thermo Trilogy Corporation
 9145 Guilford Road, Suite 175
 Columbia, MD 21046

Dear Ms. Dively,

Subject: Revised Master label containing sublabel text
 Neem Oil 70% Fungicide/Insecticide/Miticide
 EPA Reg. No. 70051-2
 Your submission dated 4/1/99

Revised labeling referred to above, and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (FIFRA), is acceptable subject to the comments listed below:

1. Before your next label printing, we strongly recommend that you re-format your dilution and application instructions for the agricultural section of your master label and your agricultural sub-label to an all table format. You must clearly state recommended amount of product, gallonage of water for both high and low volume applications for each crop grouping. We recommend that you use both percent solution and amount of product for the dilution directions. (Mixing of the terms is confusing).
2. Your dilution directions state that 0.5 gallons (for fungicide use on stone and tropical [fruit]) and 0.5 quart (for fungicide and miticide use on pome fruits and nuts and walnuts) of NEEM OIL 70% can be used per acre for low volume applications but your table for low volume application does not provide directions for anything other than 1 quart of NEEM OIL 70%. Before your next label printing, we recommend that you replace your text directions for dilutions/application for low volume sprays with a table to include all crops (including stone fruit, pome fruit, citrus, nuts and walnuts) with the appropriate gallons of water, amount of Neem Oil 70% and percent dilution. This is less complicated than using a footnote referring to crops that have only text use directions.

CONCURRENCES

SYMBOL	7511C	7511C						
SURNAME	Loranger	[Signature]						
DATE	4/12/99	4/13/99						

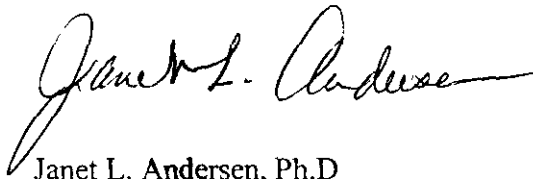
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3. Per your 70051-5 label, you must add the following text prior to your next label printing:

"The maximum application rate is 20 grams of active ingredient or less per acre according to the tolerance exemption listed in 40 CFR 180.1119."

A stamped copy of the label is enclosed for your records. Please submit your revised label for our review prior to your next label printing. Please contact Judy Loranger at (703) 308-8056 if you have any questions regarding this letter.

Sincerely yours,



Janet L. Andersen, Ph.D

Director

Biopesticides and Pollution

Prevention Division (7511C)

MASTER LABEL

This master label bears directions for agricultural, commercial and homeowner use with various application rates specific to the associated container size.

Neem Oil 70%

Broad Spectrum Fungicide/Insecticide/Miticide

For Indoor/Outdoor Use on Ornamental Flowering Plants, Trees, Shrubs, Foliage, Vegetables, Fruits, Nuts, and Row Crops Grown on Commercial Farms and Nurseries, Greenhouses, Landscapes and Homes and Residential Landscapes
Controls Fungal Diseases Including Black Spot, Mildews, Rusts, and Scab
Kills Mites and Insects Including Whiteflies, Aphids, and Scales

ACTIVE INGREDIENT:

Clarified Hydrophobic Extract of Neem Oil....70%

INERT INGREDIENTS.....30%

TOTAL.....100%

This product contains 5.46 lb of clarified hydrophobic extract of neem oil per US gallon.

This container will treat up to 0.5 acres when used at the highest application rate (only for containers less than 5 gallons).

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

EPA Reg. No. 70051-2 EPA Est. No. 69448-FL-01
Net Contents: 2.5 gallons, 100 gallons
Composition covered by US Patents 5,298,251; 5,356,629;
5,372,817; 5,405,612; and 5,409,708.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT
IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF IN EYES: Flush eyes with plenty of water. Call physician if irritation persists.

Personal Protective Equipment:

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber or nitrile rubber or neoprene rubber or polyvinylchloride (PVC) or Viton.
- Shoes plus socks.

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

User Safety Recommendations:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- 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

Agricultural/Commercial Use

This product may be hazardous to fish and aquatic invertebrates. 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 by cleaning of equipment or dispersal of equipment washwaters.

Homeowner Use

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

BEE HAZARD

This product is toxic to bees exposed to direct treatment. Do not apply this product while bees are actively visiting the treatment area.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

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 through any type of irrigation system.

STORAGE AND DISPOSAL

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

Pesticide Storage: Keep in original container. Store in a dry place away from direct sunlight, feed, or foodstuffs. Keep container tightly sealed when not in use. Do not store below 40° F (4°C).

Agricultural/Commercial Use

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of onsite or at an approved waste disposal facility.

Agricultural/Commercial Use

Container Disposal: Triple rinse. Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Homeowner

Pesticide and Container Disposal: Do not reuse empty container. Securely wrap original container in several layers of newspaper and discard in trash.

General Information:

- Kills eggs, larvae, and adult insects.
- Prevents and controls black spot on roses, anthracnose, rust and powdery mildew.
- Kills insects and their eggs.

- Formulated for interiorscape use.
- Shake well before using.
- For best results, maintain constant agitation in spray equipment.
- For optimal performance, do not mix with cold water (less than 45°F).
- *Neem Oil 70% is most effective when applied in early to mid-morning or late afternoon when adult pests, such as whiteflies are normally sedentary on the undersides of the foliage.*
- Spray solutions should be used within several hours of preparation for maximum effectiveness. Do not store diluted solution for later use.
- Do not apply to wilted or otherwise stressed plants, or to newly transplanted materials prior to root establishment.
- Do not apply to known sensitive plant species, such as impatiens flowers, fuchsia flowers, hibiscus flowers, some rose flowers, ornamental olive trees, or some carnation varieties without prior testing.
- When used in conjunction with beneficial insects, it is recommended that a small trial be conducted to assure compatibility before using on a large scale.
- As with other oil-based products, care should be exercised in timing applications to early morning/late evening to minimize the potential for leaf burn.
- Use with care on plants with tender tissue. Check for leaf burn in small scale trials prior to use.
- Thorough coverage is necessary to provide good disease and mite control. Neem Oil 70% prevents fungal attack of plant tissue and contact activity to mite pressure on the plant. Avoid excessive runoff of spray material for maximum control.

Agricultural/Commercial Use

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

Homeowner Use

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

AGRICULTURAL USE REQUIREMENTS

Use this product only 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) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 4 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 is:

- Coveralls.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber or nitrile rubber or neoprene rubber or polyvinylchloride (PVC) or Viton.
- Shoes plus socks.

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.

TANK MIXING

Neem Oil 70% has been found to be compatible with most commonly used fungicides, insecticides, and fertilizers. Physical compatibility should first be checked with other products before mixing by using a jar test. Using a quart jar, add the proportionate amounts of the products to 1 quart of water. After thoroughly mixing, let mixture stand for at least 5 minutes. Growers should tank-mix combinations for phytotoxicity on a sample of plants prior to use. *Due to the wide variation in climatic conditions, cultural practices, and other factors, the User assumes full responsibility for any crop damage or other liability resulting from the use of Neem Oil 70% in a tank mix combination.* Avoid tank mixes with Morestan, Vendex, Captan, Sulfur, Bravo/Echo or other chemically similar products as unpredictable results or leaf burn may occur.

COMMERCIAL USE

- Do not use Triact 70 EC on food crops.

GREENHOUSE, LANDSCAPE, AND NURSERY USE INSTRUCTIONS FUNGICIDE USE

ORNAMENTAL DISEASE CONTROL

Neem Oil 70% is an effective fungicide for the prevention and control of various fungal diseases including black spot on roses, powdery mildew, downy mildew, anthracnose, rust, leaf spot, botrytis, needle rust, scab, flower, twig, and tip blight, and alternaria.

Landscape, Greenhouse, and Nursery Ornamentals:

Neem Oil 70% will provide broad spectrum control of many fungal diseases affecting ornamental flowering plants, trees, shrubs, and foliage when used at the rate of 1 gallon per 100-200 gallons of water, depending on the level of disease pressure. The lower rate (1:200) can be used when spraying as a preventative in a greenhouse while the higher rate (1:100) is needed for outdoor applications. Determine the best rate for your particular situation.

Greenhouse:

When Neem Oil 70% is used as a preventative, the lower rate (1:200) will provide adequate control for most greenhouse situations. If disease pressure is evident, the higher rate (1:100) is recommended. Applications for disease prevention should be made on a 7-14 day schedule depending on the anticipated severity of the disease pressure. To control existing disease, Neem Oil 70% should be applied on a 7-Day schedule until the disease pressure is eliminated. A 14-day schedule should then be used to prevent disease pressure from returning. NOTE: Greenhouse roses should only be sprayed in a rotation program, which includes Neem Oil 70% once every 4 weeks.

Landscape Ornamentals:

In outdoor landscape applications, apply Neem Oil 70% at rates of 1:50 - 1:200 rate (see tables for detailed use rates). This will

provide the necessary control under the extreme outdoor conditions. When using Neem Oil 70% as a preventative, application should be made on a 14-day schedule. If disease is present, a 7-day application schedule should be used to control the disease and prevent further damage from occurring.

MIXING INSTRUCTIONS:

Add Neem Oil 70% to one-half (1/2) full tank under agitation containing water of 45° F or greater before filling to desired level. If water temperature is below 45° F, premix Neem Oil 70% at a 1:1 ratio with tepid water to ensure good emulsification. Then dilute to final volume. When combining with other products, such as wettable powder insecticides or fungicides, add these items first when the tank is approximately 1/3 full. Ensure that there is good agitation while mixing for complete emulsification. Maintain agitation during spray application. Do not use if this oil does not emulsify.

APPLICATION INSTRUCTIONS:

Apply to runoff at 25-40 psi with hand sprayer or 100-200 psi with power sprayer as a fine spray to both leaf surfaces. Excessive application is unnecessary and should be avoided.

Management of Landscape and Ornamental Diseases			
Spray Target	Concentration	Spray Interval	Precautions
Potted Plants (Greenhouse)	1:100-1:200 (1.0%-0.5%)	14 days	Trial first on open blooms
Flowering Bench Crops (Greenhouse)	1:100-1:200 (1.0%-0.5%)	7-14 days	Trial first on open blooms-not suggested for cut roses
Outdoor Flowering Plants	1:100-1:200 (1.0%-0.5%)	7-14 days	Do not spray impatiens flowers
Outdoor Woody Plants	1:50-1:100 (2.0%-1.0%)	14 days	

Management of Turf Diseases			
Spray Target	Concentration	Spray Interval	Precautions
Snow Mold	1:100-1:50 (1.0%-2.0%)	14 days	In fall before first snow
Dollar Spot	1:100-1:200 (1.0%-0.5%)	7-14 days	At first sign of disease
Brown Patch	1:100-1:200 (1.0%-0.5%)	7-14 days	At first sign of disease

INSECTICIDE/MITICIDE USE:

For use to control whiteflies, mealybugs, aphids, leafhoppers, mites, and scales on ornamentals, trees, and shrubs in and around greenhouses, commercial nurseries, and other commercial structures.

Neem Oil 70% should be used at the rate of 1-2 gallons per 100 gallons of water. The low rate (1.0%) can be used when pest pressure is low. The high rate (2.0%) should be used for high pest infestations or to control more troublesome pests, such as mites and scales. Determine the best rate for your particular situation.

Sprays should be made on a 7-14 day interval depending on the severity of the pest problem. The 7-day schedule should be used until the pest population is reduced. A 14-day interval should then be used for control. Sprays should be made in early to mid-morning or late afternoon. This is important to ensure that the spray thoroughly wets the pests to be controlled, which are often sedentary on the foliage at these times, and also minimizes plant stress.

AGRICULTURAL USE DIRECTIONS

- Do not use Trilogy in nurseries, on turf, or landscape plantings.
- Neem Oil 70% is a broad spectrum fungicide of certain diseases and controls mites in citrus, deciduous fruits and nuts, vegetable crops, cereal grains, and other miscellaneous crops.
- Do not apply this product through any type of irrigation system.
- Use care when applying near streams, ponds, lakes, or other bodies of water. Neem Oil 70% should not be applied when weather conditions favor drift or when the likelihood of runoff is high.
- Thorough plant coverage is essential to obtain optimal levels of control.
- For insects and mites: For best results, apply Neem Oil 70% thoroughly before adult insects, mites, or eggs are present in large numbers.
- For diseases: Apply Neem Oil 70% as a 1.0% solution in sufficient amounts of water to achieve complete coverage of foliage. (See the following detailed directions per crop groupings.) When used as a foliar fungicide, begin applications when conditions are favorable for disease but before infection. Neem Oil 70% may be applied every 7-14 days until threat of disease is over. Neem Oil 70% may be used in rotation with other fungicides to increase the spectrum of control.
- For mites: For best results, apply Neem Oil 70% in sufficient amounts of water to achieve complete coverage. Neem Oil 70% is most effective when applied before mites or eggs are present in large numbers. (See the following detailed directions per crop groupings.) Apply at a rate of 1.0-2.0% Neem Oil 70%. Neem Oil 70% should be reapplied every 7-21 days until pressure is over.
- For insects: For best results, apply Neem Oil 70% at 1.0-2.0% in sufficient amounts of water to achieve complete coverage. Neem Oil 70% is most effective when applied before insects or eggs are present in large numbers. Repeat application based on pest pressure and field scouting for best results. Use the dilution tables to calculate dilution rates.
- Consult local agricultural extension service or experiment station for detailed information on timing of applications for the most effective control for your area.
- Neem Oil 70% may be applied by conventional, low volume, and aerial application equipment.

APPLICATION INSTRUCTIONS

Ground Application: Apply Neem Oil 70% by ground application in a minimum of 25 gallons of water/acre.

Aerial Application: For those crops where aerial applications are indicated, apply a minimum of 5 gallons of water/acre unless otherwise specified. Avoid application under conditions when uniform coverage cannot be obtained or when excessive drift may occur. Do not apply directly to humans, animals or aquatic animals.

MIXING INSTRUCTIONS:

Add Neem Oil 70% to one-half (1/2) full tank under agitation containing water of 45° F or greater before filling to desired level. If water temperature is below 45° F, premix Neem Oil 70% at a 1:1 ratio with tepid water to ensure good emulsification. Then dilute to final volume. When combining with other products, such as wettable powder insecticides or fungicides, add these items first when the tank is approximately 1/3 full. Ensure that there is good agitation while mixing for complete emulsification. Maintain agitation during spray application. Do not use if this oil does not emulsify.

DILUTION TABLE FOR LOW VOLUME (INCLUDING
AERIAL) APPLICATIONS (5-30 gallons per acre)

Gallons of Water	Neem Oil 70%	Dilution
5	1 Quart*	5%
10	1 Quart*	2.5%
15	1 Quart*	1.67%
20	1 Quart*	1.25%
25	1 Quart*	1%
30	1 Quart*	0.83%

*For Citrus refer to specific application instructions.

DILUTION TABLE FOR HIGH VOLUME APPLICATION
(25-250 gallons per acre)

Gallons of Water	Gallons of Neem Oil 70% for 0.5% Solution	Gallons of Neem Oil 70% for 1.0% Solution	Gallons of Neem Oil 70% for 1.5% Solution	Gallons of Neem Oil 70% for 2.0% Solution
25	0.125 (16 oz)	0.25 (32 oz)	0.375 (48 oz)	0.5 (64 oz)
50	0.25 (32 oz)	0.5 (64 oz)	0.75 (96 oz)	1.0
75	0.375 (48 oz)	0.75 (96 oz)	1.125	1.5
100	0.5	1.0	1.5	2.0
125	0.625 (80 oz)	1.25	1.875	2.5
150	0.75	1.5	2.25	3.0
175	0.875 (112 oz)	1.75	2.625	3.5
200	1.0	2.0	3.0	4.0
225	1.125	2.25	3.375	4.5
250	1.25	2.5	3.75	5.0

For dilutions less than 50 gallons, the recommended use is a minimum of 32 ounces of Neem Oil 70%.

CITRUS, POME (DECIDUOUS), STONE, TROPICAL FRUITS AND NUTS

Citrus

Use NEEM OIL 70% on citrus to control diseases to include Anthracnose, Post-Bloom Fruit Drop, and Scabs. Apply as a foliar application at the rate of 1.0% in 25-200 gallons of water for high volume applications or a minimum of 0.5 gallons NEEM OIL 70% in a minimum of 5 gallons of water per acre for low volume applications. Do not apply more than 2.5 gallons of NEEM OIL 70% per acre, per application. NEEM OIL 70% may be reapplied every 7-14 days until threat of disease is over.

For control of Alternaria and Greasy Spot, apply NEEM OIL 70% at a 1.0 % solution in 25-125 gallons of water per acre in combination with Copper @ 2.0 lbs. a.i. per acre (as found in EPA registered products such as Kocide® and Champ®) as a preventative disease spray tank mixture.

Use NEEM OIL 70% on citrus to control mites at a rate of 1.0-2.0% in 25-200 gallons of water for high volume application or 0.5 gallon NEEM OIL 70% in a minimum of 5 gallons of water per acre for low volume application. As a dormant oil spray, use NEEM OIL 70% as a 2.0% solution or 1 quart NEEM OIL 70% minimum per acre. Do not apply more than 5 gallons of NEEM OIL 70% per acre, per application.

Stone and Tropical

FUNGICIDE USE: Apply NEEM OIL 70% at a rate of 1.0% in 25-200 gallons of water for high volume applications or 0.5 gallons NEEM OIL 70% in a minimum of 5 gallons of water per acre for low volume application. NEEM OIL 70% may be reapplied every 7-14 days until threat of disease is over.

MITICIDE USE: Use NEEM OIL 70% at first sign of pests or pest damage at the appropriate rate listed below as a foliar spray in sufficient water for thorough coverage. Repeat applications as needed for adequate control every 7-21 days. Apply a 1.0-2.0% solution of NEEM OIL 70% for high volume application or a minimum of 1 quart NEEM OIL 70% in a minimum of 5 gallons of water per acre for low volume application. Do not apply more than 5 gallons of NEEM OIL 70% per acre, per application.

Pome (Deciduous Fruits) and Nuts

FUNGICIDE USE: Apply NEEM OIL 70% at a rate of 1.0% in 25-100 gallons of water per acre or 0.5 quarts NEEM OIL 70% in a minimum of 5 gallons of water per acre for low volume application. Apply no more than 2.5 gallons NEEM OIL 70% per acre in solution per application. Repeat applications every 7-14 days.

Walnuts: Avoid spraying after husk split.

MITICIDE USE: Use NEEM OIL 70% at a rate of 1.0-2.0% in 25-100 gallons of water per acre or 0.5 quarts NEEM OIL 70% in a minimum of 5 gallons of water per acre for low volume application. Apply no more than 2 gallons of NEEM OIL 70% per acre per solution. Apply at first sign of pests or pest damage. Repeat application as needed for adequate control every 7-21 days. Do not apply more than 5 gallons NEEM OIL 70% per acre, per application.

Walnuts: Avoid spraying after husk split

CROPS <i>Including but not limited to:</i>			PESTS		DISEASES
Apples	Kumquats	Damson plums	Aphids	Spider mites	Anthracnose
Apricots	Lemons	Japanese plums	Apple grain aphids	Psyllids	Alternaria
Avocados	Limes	Pomegranates	Black cherry aphids	Scales	Post-bloom fruit drop
Bananas	Loquats	Prunes	Green apple aphids	Calico scales	Mildews
Catamondin	Lychee	Pummelos	Leafcurl aphids	Frosted scales	Downy mildew
Cherries	Mangoes	Quinces	Mealy plum aphids	Lecanium scales	Powdery mildew
Barbados cherries	Mandarins	Tangelos	Rosy apple aphids	San Jose scales	Scabs
Sour cherries	Satsuma	Tangerines	Woolly aphids	Whiteflies	Greasy spot
Sweet cherries	mandarins		Citrus blackflies	Citrus whiteflies	Shothole
Chirimoya	Nectarines		Fruit flies	Silverleaf whiteflies	
Citrus citron	Olives		Leafminers	Sweetpotato whiteflies	
Citrus hybrids	Oranges		Citrus leafminers		
Coconuts	Papayas		Mealybugs		
Crabapples	Passion Fruit		Mites		
Dates	Peaches		Rusty mites		
Feijoa	Pears				
Figs	Oriental pears				
Grapefruits	Pineapples				
Guavas	Plantains				
Jujubes	Plums				
Kiwifruit	Chickasaw Plums				

NUTS

CROPS Including but not limited to:			PESTS		DISEASES
Almonds	Chinquapins	Pecans	Aphids	Frosted scales	Leaf spot Shot hole
Beach nuts	Filberts	Pistachios	Woolly aphids	Lecanium scales	
Brazil nuts	Hickory nuts	Walnuts	Leafrollers	San Jose scales	
Butternuts	Japanese		Fruit tree	Weevils	
Cashews	horsechestnuts		Leafrollers	Chestnut weevils	
Chestnuts	Macadamia nuts		Mites		
			Rust mites		
			Spider mites		
			Scales		
			Calico scales		

CUCURBITS

Refer to specific application instructions found directly below the heading Agricultural Use Directions

CROPS Including but not limited to:		PESTS		DISEASES
Balsam pears (bitter melons)	Melons (incl. hybrids)	Aphids	Scales	Mildews Downy mildew Powdery mildew
Cantaloupes	Honeydew melons	Leafcurl aphids	Squash bugs	
Casaba	Muskmelons	Woolly aphids	Whiteflies	
Chinese	Persian melons	Leafminers	Greenhouse whiteflies	
Waxgourds	Pumpkins	Mites	Silverleaf	
Citron melons	Squashes	Spider mites	whiteflies	
Crenshaw	Watermelons (incl. hybrids)	Calico scales	Sweetpotato whiteflies	
Cucumbers	Zucchini	Frosted scales		
Gherkins		Lecanium scales		
Gourds		San Jose scales		
Honey balls				

BULB, COLE AND LEAFY VEGETABLES

Refer to specific application instructions found directly below the heading Agricultural Use Directions

CROPS Including but not limited to:			PESTS		DISEASES
Arrugula	Chicory	Leek	Aphids		Alternaria Botrytis Mildews Downy mildew Powdery mildew Rusts White rust
Broccoli	Red chicory	Lettuce (head & leaf)	Woolly aphids		
Broccoli raab	Cilantro	Low-bok	Leafminers		
Chinese Broccoli (Gai lan)	Collards	Onions	Mites		
Brussels sprouts	Corn salad	Orach	Rust mites		
Cabbage (head & Leaf)	Cress	Parsley	Spider mites		
Chinese cabbage	Watercress	Purslane	Whiteflies		
(Bok choy, Napa)	Dalkon	Raddichio	Greenhouse whiteflies		
Chinese mustard	Endive	Rappini	Silverleaf whiteflies		
Cabbage (Gai Choy)	Fennel	Rhubarb	Sweetpotato whiteflies		
Cauliflower	Garlic	Shallots			
Celery	Greens	Spinach			
Celtuce	Collard greens	Chinese spinach			
Chervil	Mustard greens	(Amaranth, Tampala)			
	Rape greens	Swiss chard			
	Kale	Turnip tops			
	Kohlrabi				

LEGUME AND FRUITING VEGETABLES

Refer to specific application instructions found directly below the heading Agricultural Use Directions

CROPS Including but not limited to:			PESTS	DISEASES
Beans	Guar	Pigeon peas	Aphids	Blights
Broad beans	Lentils	Snow peas	Woolly aphids	Leaf blight
Calabaza	Peas	Soybeans	Beetles	Mildews
Chickpeas	Peanuts	Tomatillos	Bean leaf beetles	Powdery mildew
Eggplants	Pepinos	Tomatoes	Colorado Potato Beetles	Molds
Ground cherries	Peppers		Mexican bean beetles	Gray mold
			Leafminers	Leaf spots
			Mites	Rusts
			Rust mites	
			Spider mites	
			Psyllids	
			Whiteflies	
			Greenhouse whiteflies	
			Silverleaf whiteflies	
			Sweetpotato whiteflies	

ROOTS AND TUBER VEGETABLES

Refer to specific application instructions found directly below the heading Agricultural Use Directions

CROPS Including but not limited to:			PESTS	DISEASES
Artichokes	Horseradish	Taro (Dasheen)	Aphids	Blights
Beets	Parsnips	Turmeric	Beetles	Mildews
Cardone	Potatoes	Turnips	Colorado potato beetles	Powdery mildew
Carrots	Sweet potatoes	Yams	Mites	Rusts
Cassava	Radishes	Yam beans	Rust mites	
Ginger	Rutabaga		Spider mites	
			Psyllids	
			Scales	
			Calico scales	
			Frosted scales	
			Lecanium scales	
			San Jose scales	
			Whiteflies	
			Greenhouse whiteflies	
			Silverleaf whiteflies	
			Sweetpotato whiteflies	

SMALL FRUITS AND BERRIES

Refer to specific application instructions found directly below the heading Agricultural Use Directions

CROPS Including but not limited to:			PESTS	DISEASES
Blackberries	Gooseberries	Strawberries	Aphids	Mildews
Blueberries	Grapes	Youngberries	Woolly aphids	Downy mildew
Boysenberries	Huckleberries		Leafrollers	Powdery mildew
Cranberries	Loganberries		Mites	Rots
Currants	Olallie berries		Rust mites	Black rot
Dewberries	Raspberries(black & red)		Spider mites	
Elderberries			Scales	

HERBS AND SPICES

Refer to specific application instructions found directly below the heading Agricultural Use Directions

CROPS Including but not limited to:			PESTS		DISEASES
Anise	Cumin	Peppermint	Aphids	Frosted scales	Mildews
Balm	Curry leaf	Rosemary	Woolly aphids	Lecanium scales	Powdery mildew
Basil	Dandelion	Rue	Mites	San Jose scales	Leaf spot
Borage	Dill	Sage	Rust mites		
Chamomile	Fennel	Savory	Spider mites		
Caraway	Marigold	Spearmint	Scales		
Catnip	Marjoram	Sweet bay	Calico scales		
Celery	Mint	Tarragon			
Chives	Nasturtium	Thyme			
Coriander	Pennyroyal	Wintergreen			

CEREAL GRAINS AND OTHER MISCELLANEOUS CROPS

FUNGICIDE USE: Apply NEEM OIL 70% at a rate of 1.0% in 25-100 gallons of water per acre or 2 pints NEEM OIL 70% in a minimum of 5 gallons of water per acre for low volume applications. Repeat applications every 7-14 days. Apply no more than 2 gallons NEEM OIL 70% per acre, per application. Larger plants will require higher amounts of water to obtain good coverage.

MITICIDE USE: Apply NEEM OIL 70% at a rate of 1.0-2.0% in 25-100 gallons of water per acre or 2 pints NEEM OIL 70% in a minimum of 5 gallons of water per acre for low volume application. Apply no more than 2 gallons NEEM OIL 70% per acre in solution per application. Apply in a solution of sufficient volume to achieve complete coverage of foliage. NEEM OIL 70% may be reapplied every 7-21 days as needed for adequate control. Larger plants will require higher amounts of water to obtain good coverage.

CROPS Including but not limited to:			PESTS		DISEASES
Acerola	Sweet corn	Safflower	Beetles		Rusts
Alfalfa	Cotton	Seagrapes	Asparagus		
Arracaga(Apio)	Hops	Sesame	Beetles		
Asparagus	Jicama	Sorghum	Lygus bugs		
Barley	Jujuba	Soursup	Thrips		
Breadfruit	Kinop	(Quarabanas)	Whiteflies		
Buckwheat	Mushrooms	Sugarcane	Greenhouse whiteflies		
Canola	Oats	Star apples	Silverleaf whiteflies		
Coffee	Okra	Sunflowers	Sweetpotato whiteflies		
Coriander	Quenepa	Tobacco			
Corn	Nispero	Wheat			
Popcorn	Rice				

Warranty

Thermo Trilogy Corporation warrants that the material contained herein conforms to the description on the label and is reasonably fit for the purposes referred to in the directions for use. Timing and method of application, weather, watering practices, nature of soil, the insect problem, condition of the crop, incompatibility with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herein. NO OTHER EXPRESS OR IMPLIED WARRANTY OF THE FITNESS OR MERCHANTABILITY IS MADE.

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Champ® is a registered trademark of Agtrol Chemical Products®

HOMEOWNER USE DIRECTIONS

GENERAL INFORMATION:

- Do not add adjuvants (spreaders, stickers, extenders, etc.) to Neem Oil 70%.
- Stops powdery mildew in 24-hours.

FUNGICIDE USE: For use on FRUITS, NUTS, VEGETABLES, HERBS, SPICES, ROSES, HOUSEPLANTS, FLOWERS, TREES, SHRUBS

APPLICATION INSTRUCTIONS:

Neem Oil 70% is an effective fungicide for the prevention and control of various fungal diseases including powdery mildew, black spot, downy mildew, anthracnose, rust, leaf spot, botrytis, needle rust, scab and flower, twig, tip blight, and alternaria. As a preventative, Neem Oil 70% should be applied on a 7 to 14 day schedule until the potential for disease development is no longer present. To control disease already present, apply Neem Oil 70% on a 7 day schedule until disease pressure is eliminated. Then continue spraying on a 14 day schedule to prevent the disease from reoccurring. To prevent rust leaf spot diseases, anthracnose and scab, begin applications at the first sign of spring budding. To prevent powdery mildew, apply in mid-summer or when disease is first detected. Applications should continue until disease pressure no longer exists.

MIXING INSTRUCTIONS:

Mix Neem Oil 70% at the rate of 2 tablespoons (1 ounce) per gallon of water. Thoroughly mix solution and spray all plant surfaces (including undersides of leaves) until completely wet. Frequently mix solution as you spray.

INSECTICIDE/MITICIDE USE: For use on FRUITS, NUTS, VEGETABLES, HERBS, SPICES, ROSES, HOUSEPLANTS, FLOWERS, TREES, SHRUBS

APPLICATION INSTRUCTIONS:

Apply Neem Oil 70% at first sign of insects/mites. For control of aphids, spider mites, scale, whiteflies, beetles, leafrollers, and other insect pests. Neem Oil 70% is most effective when applied every 7 to 14 days. For heavy insect populations, spray on a 7 day schedule.

MIXING INSTRUCTIONS:

Mix Neem Oil 70% at the rate of 2 tablespoons (1 ounce) per gallon of water. Thoroughly mix solution and spray all plant surfaces (including undersides of leaves) until completely wet. Frequently mix solution as you spray.

Net Contents: 1 Quart (0.946 liters)