

70051-111

4/19/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

April 19, 2011

Christine A. Dively
Director of Regulatory Affairs
Certis USA, LLC
9145 Guilford Road, Suite 175
Columbia, MD 21046

Subject: Label Amendment—Incorporating comments of NOR dated April 7, 2011 and addition of hose-end applicator instructions

Product Name: Trilogy XL-O

EPA Reg. No.: 70051-111

Application Dated: April 13, 2011

Decision Number: 447930

Dear Ms. Dively:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy of the label is enclosed for your records

If you have any questions, you may contact Clayton Myers at (703) 347-8874 or myers.clayton@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be "R Gebken".

Handwritten initials "for" in black ink.

Richard Gebken, Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure:
Stamped Label

2 8 7

Trilogy XL- O
Fungicide/Miticide/Insecticide

Broad Spectrum Insecticide, Fungicide, and Miticide
For Control of Insects, Diseases, And Mites on Vegetables, Fruits, Nuts, Herbs, Spices,
Roses, Flowers, Turfgrass and Shrubs Around The Home
For Outdoor Residential Use Only
Stops Powdery Mildew
Can be Used Up to Day of Harvest

ACTIVE INGREDIENTS:

Pyrethrins.....	0.25%
Clarified Hydrophobic Extract of Neem Oil.....	70.00%
OTHER INGREDIENTS:.....	29.75%
Total.....	<u>100.00%</u>

Net Contents: 16 fluid ounces

EPA Reg. No. 70051-111
EPA Est. No. 70051-CA-001

Lot No.:

Manufactured by
Certis USA, L.L.C.
9145 Guilford Road
Suite 175
Columbia, MD 21046

ACCEPTED
APR 19 2011
Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

EPA. Reg. No: 70051-111



KEEP OUT OF REACH OF CHILDREN
CAUTION

See Back or Side Panel for Additional
Precautionary Statements

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin, eyes, or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

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.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If inhaled: Move the person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

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. Call a poison control center or doctor for treatment advice.

Hotline Number: 1-800-255-3924. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and aquatic organisms. 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.

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.

GENERAL INFORMATION: For Organic Gardening

SHAKE WELL BEFORE AND DURING USE.

Multi-purpose insecticide/fungicide/miticide. Kills eggs, larval and adult stages of listed insects. Prevents fungal attack of plants' tissues. Not for use in food handling areas. Trilogy XL-O is most effective when applied in early to mid-morning or late afternoon when adult insect pests, such as whiteflies, are normally sedentary on the undersides of the foliage. Use spray solutions within several hours of preparation for maximum effectiveness. Do not use more than 1 time per day on the same plants. Do not apply this product more than 10 times per season. For best results maintain constant agitation in spray equipment. For optimal performance, do not mix with cold water or apply under cold ambient temperatures (less than 45°F). If product thickens (freezes) before using, place in a warm room (greater than 45°F) for a few days or in warm water (120°F) for 2 to 8 hours until completely thawed. Do not use partially thawed material. Do not apply to wilted or otherwise stressed plants, or to newly transplanted material prior to root establishment. When using in conjunction with beneficial insects, conduct a small trial to assure compatibility before using on a large scale. As with other products that contain oils, exercise care in timing applications to early morning/late evening to minimize the potential for leaf burn. Do not add adjuvants (spreaders, stickers, extenders, etc.) to Trilogy XL-O. Use with care on plants with tender tissue. Do not apply to known spray sensitive plant species such as: impatiens flowers, fuchsia flowers, hibiscus flowers, some rose flowers, ornamental olive trees, red maples, some carnation varieties or similar plants without prior testing. Not for use in outdoor residential misting systems. Do not allow adults, children or pets to enter the treated area until sprays have dried. Do not apply directly

to or near water or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water the treated area(s) or apply when heavy rain is expected. Rinse applicator over lawn or garden areas only.

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

Application Instructions: Trilogy XL-O is an effective fungicide for the prevention and control of various fungal diseases including powdery mildew, black spot, brown spot, dollar spot, snow mold, downy mildew, anthracnose, rust, leaf spot, botrytis, needle rust, scab and flower, twig and tip blight. As a preventative, apply Trilogy XL-O on a 7 to 14 day schedule until the potential for disease development is no longer present. To control disease already present, apply Trilogy XL-O 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. For brown patch and dollar spot, begin spraying at first sign of disease on a 7 to 14 day interval. For snow mold, begin spraying on a 14 day interval in the fall before the first snow. Continue applications until disease pressure no longer exists.

Mixing Instructions: Mix Trilogy XL-O at the rate of 2 tablespoons (1 fluid ounce) per gallon of water. Thoroughly mix solution and spray all plant leaf surfaces (including undersides of leaves) until completely wet. Excessive application is unnecessary and to be avoided.

INSECTICIDE USE: For use on FRUITS, NUTS, VEGETABLES, HERBS, SPICES, ROSES, HOUSEPLANTS, FLOWERS, SHRUBS and TURFGRASS

Application Instructions: Apply Trilogy XL-O at first sign of insects/mites. Trilogy XL-O provides for a quicker and more complete control, and acts as an "exciter" to flush insect pests out of hiding and into direct contact with spray residues. For control of aphids, spider mites, scale, mealybugs, whiteflies, beetles, loopers, leafminers, leafrollers, armyworms, webworms, weevils, tent caterpillars, fungus gnats, leafhoppers, cabbageworms, squash bugs, squash vine borer, stink bugs, thrips, tomato hornworm, lace bugs, boxelder bugs, grasshoppers, crickets, ants, earwigs, chinch bugs, chiggers and many other insect pests. Trilogy XL-O is most effective when applied on a 7 to 14 day schedule. For heavy insect populations, spray on a 7 day schedule.

Mixing Instructions: Mix Trilogy XL-O at the rate of 2 tablespoons (1 fluid ounce) per gallon of water. Thoroughly mix solution and spray all plant leaf surfaces (including undersides of leaves) until completely wet. Excessive application is unnecessary and to be avoided. Frequently agitate solution as you spray.

Optional Language for Attaching Container to a Garden Hose

Hose End Sprayer Use Instructions

The sprayer attached to the container is ready-to-use. Simply attach to your garden hose and follow these instructions:

1. Insure the large, round "on/off" knob is set to OFF.
2. Turn on water.
3. PUSH IN small knob near front of sprayer. This allows water and product to mix.
4. Hold sprayer and container level and point towards area to be sprayed.
5. Turn large, round "on/off" knob to ON.
6. Begin spraying product evenly over area you wish to treat.
7. Spray to visibly wet.
8. To stop spraying, turn large, round "on/off" knob to OFF.
9. PULL OUT small knob near front of sprayer. This prevents product from mixing with water.
10. Turn off water at faucet. Relieve water pressure in the hose by turning large, round "on/off" knob ON until water pressure is reduced.
11. Turn the knob to OFF for storage of unused product/and/or disposal of empty container.

Covers 5,000 sq. ft. or equivalent per 32 oz. container size.

-or-

Option 1**HOW TO USE**

Make sure water control knob on hose sprayer is in the "OFF" position. Hold by handle and shake vigorously, turning bottle as you shake. Attach hose to spray nozzle. Bend safety tab back and break off. Turn control to "WATER" position. Slowly turn on water supply to moderate rate of flow. Point nozzle toward spray area, turn control knob to "ON". Product will automatically mix with water. Slowly sweep the area to be treated. To stop spraying, turn control valve to the "OFF" position. Turn off water at faucet. To relieve pressure, turn control valve to the "WATER" position pointing sprayer away from self. Remove from hose.

Option 2**TWIST & SHOOT™ READY TO SPRAY INSTRUCTIONS**

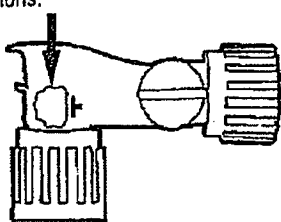
- 1) Make sure control knob is in "OFF" position, then connect to garden hose.
- 2) Turn water on at faucet. When spraying low growing plants and small shrubs, twist the control knob right, to the "FAN" position. When spraying taller trees, shrubs and other plants, twist the control knob left to the "STREAM" position for extended reach and more uniform coverage. The product mixes automatically with the water as you spray.
- 3) To stop spraying, turn the control knob lever to the "OFF" position. Turn off water at the faucet and disconnect sprayer from garden hose.

-or-

READY-TO-SPRAY INSTRUCTIONS**FOR OUTDOOR USE ONLY****DOUBLE KNOB SPRAYER INSTRUCTIONS**

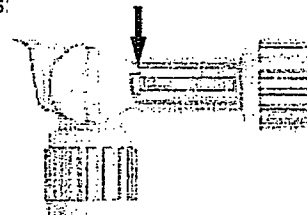
The sprayer attached to the container is ready-to-use. Simply attach to the garden hose and follow these simple instructions:

1. Insure the large, round "on/off" knob is set to OFF.
2. Turn on water.
3. Rotate the small, star-shaped product control knob to align the flat portion of the knob with the vertical portion of the lock tab and PUSH IN the knob to open. This allows product to mix with water.
4. Hold sprayer and container level and point towards area to be sprayed.
5. Turn large, round "on/off" knob forward (away from you) to ON.
6. Begin spraying product evenly over area you wish to treat.
7. To stop spraying, turn large, round "on/off" knob backward (toward you) to OFF.
8. PULL OUT and rotate the small, star-shaped product control knob. This prevents product from mixing with water.
9. Turn off water at the faucet. Relieve water pressure in the hose by turning large, round "on/off" knob to ON until water pressure is reduced.
10. Turn the knob to OFF for storage or unused product and/or disposal of empty container.

**SINGLE KNOB SPRAYER INSTRUCTIONS**

The sprayer attached to the container is ready-to-use. Simply attach to the garden hose and follow these instructions:

1. Turn on water.
2. Hold sprayer and container level and point towards area to be sprayed.
3. Bend yellow tab back and turn knob backward (toward you) to ON.
4. Begin spraying product evenly over area you wish to treat.
5. To stop spraying, turn knob forward (away from you) to OFF.
6. Turn off water.



Properly store unused product or dispose of empty container.

OR

-or-

USING THE READY SPRAY NOZZLE

1. *Shake container well before using.*
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and a.) bend the safety tab back (located at right of dial) with your thumb and b.) hold while turning dial clockwise until it stops. Water will automatically mix with the product.
5. Spray until wet to control insects. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial counterclockwise until it stops and the safety tab engages into the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.

NOTE: This product is non-staining to most home siding depending on age and cleanliness. However, before using in areas where the spray may contact home siding (vinyl siding in particular), test in an inconspicuous area and recheck in a few hours. Do not use if any staining is observed.

-or-

READY-TO-USE DIRECTIONS FOR USE OUTDOORS ONLY

HOW TO USE THE READY-TO-SPRAY SYSTEM

Connect

1. Shake well before using.
2. Connect sprayer to hose.
3. Turn on water.

Spray

1. To begin spraying, point nozzle in the direction you want to spray.
2. [Bend small plastic tab back and] Turn knob [clockwise] to ON position.
3. Spray evenly to the area to be treated. Refer to the [sight gauge] clear view strip (graduated scale) on the side of the container to determine the amount of product sprayed.

Finish

1. To stop spraying, [turn knob counter clockwise] to OFF position.
2. Turn off water.
3. Relieve water pressure by [bending plastic tab back and] turning knob to ON position until water slows to a drip. Then turn knob back to OFF position.
4. Disconnect sprayer from hose.

-or-

Hose End Applicator Instructions:

1. Make sure knob is twisted fully clockwise to OFF position. Shake well, then attach to hose.
2. Turn Product Control Button clockwise until the flat portion is flush with the lock tab, then push button all the way in. Avoid squeezing the bottle.
3. Turn water on at faucet, aim nozzle toward surface to be sprayed and turn knob counter-clockwise to begin spraying.
4. When finished, push Product Control Button to OFF position from opposite side. Return knob and faucet to OFF position. Discharge water pressure by turning knob ON and OFF again. Turn Product Control Button counter-clockwise away from lock tab to prevent accidental discharge. Store out of reach of children.

<p>STORAGE AND DISPOSAL:</p> <p>Pesticide Storage: Do not store diluted solutions for later use.</p> <p>Pesticide Disposal and Container Handling: Nonrefillable container. Do not reuse or refill container.</p> <p>If empty: Place in trash or offer for recycling, if available.</p> <p>If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.</p>

WARRANTY

To the extent consistent with applicable law, Certis USA, L.L.C. 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. To the extent consistent with applicable law, 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 OF MERCHANTABILITY IS MADE.