

70051-111

8/27/2012

1/11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON D C 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Susan Gallager  
Regulatory Affairs Associate  
Certis USA, L L C  
9145 Guilford Road, Suite 175  
Columbia, MD 21046

**NOTIFICATION**

**AUG 27 2012**

Subject        Application for Pesticide Notification  
                  EPA Registration Number 70051-111  
                  Date of Submission August 10, 2012

Dear Registrant

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN) 98-10 dated August 10, 2012, for the abovementioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions regarding this letter, please contact Clayton Myers at (703) 347-8874, or via email at [myers.clayton@epa.gov](mailto:myers.clayton@epa.gov)

Sincerely,

for

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

Enclosures        Copy of Label Stamped Notification



United States  
**Environmental Protection Agency**  
 Washington DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1 Company/Product Number 70051 111	2 EPA Product Manager Richard Gebken	3 Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) Trilogy XL-O	PM# Insecticide Branch	
5 Name and Address of Applicant (Include ZIP Code)  Certs USA LLC 9145 Guilford Rd Suite 175 Columbia MD 21046  <input type="checkbox"/> Check if this is a new address	6 Expedited Review In accordance with FIFRA Section 3(c)(3) (b)(i) my product is similar or identical in composition and labeling to EPA Reg No _____ Product Name _____	

**Section - II**

Amendment Explain below  
 Resubmission in response to Agency letter dated \_\_\_\_\_  
 Notification Explain below

Final printed labels in response to Agency letter dated \_\_\_\_\_  
 "Me Too" Application  
 Other Explain below

**Explanation Use additional page(s) if necessary (For section I and Section II)**

Notification of additional hose end spray directions to attach container to a garden hose per PR Notice 98 10  
 No other changes have been made to the EPA Stamped label  
 See attached certification statement

**Section - III**

1 Material This Product Will Be Packaged In

Child Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2 Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt	No per container
		If "Yes" Package wgt	No per container

3 Location of Net Contents Information  
 Label  Container

4 Size(s) Retail Container  
1 pint 1 quart

5 Location of Label Directions  
 On Label  On Labeling accompanying product

6 Manner in Which Label is Affixed to Product  
 Lithograph Paper glued  
 Stenciled  Other \_\_\_\_\_

**Section - IV**

1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)

Name Christine A Dively	Title Director of Reg Affairs	Telephone No (include Area Code) 301 483 3806
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**Certification**  
 I certify that the statements I have made on this form and all attachments thereto are true accurate and complete  
 I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law

6 Date Application Received (Stamped)

2 Signature <i>Susan Gallager</i>	3 Title Regulatory Affairs Associate
4 Typed Name Susan Gallager for Christine Dively	5 Date 8 10 2012

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# CERTIS

Certis USA  
9145 Guilford Road  
Suite 175  
Columbia, MD 21046

**(301) 604-7340**

Fax 301-604-7015  
[www.certisusa.com](http://www.certisusa.com)

By Courier

August 13, 2012

Mr Richard Gebken, Product Manager  
Insecticide Branch  
Registration Division  
US Environmental Protection Agency

**Re EPA Registration Number 70051-111  
Trilogy XL-O  
Notification to Add Directions to Connect Container to Garden Hose**

Dear Mr Gebken

On behalf of Certis U S A , L L C , (9145 Guilford Road, Suite 175, Columbia, Maryland 21046), I am respectfully submitting the following documents to support a Notification to add additional directions to connect the pesticide container to a garden hose

- EPA Form 8570-1, Application for Pesticide Registration
- Certification Statement per PR Notice 98-10 and 40CFR 152.46
- Copy of EPA-Stamped Label
- Marked version of amended label
- Clean copy of the amended label

Please do not hesitate to contact me if you have any questions about this submission. I can be reached by telephone at 301-483-3806 or email at [cdively@certisusa.com](mailto:cdively@certisusa.com)

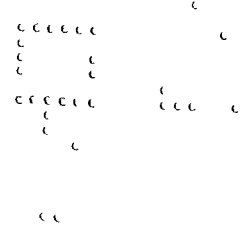
Sincerely,



Susan Gallagher  
Regulatory Affairs Associate

For

Christine Dively  
Director of Regulatory Affairs





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**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

**NOTIFICATION**

**AUG 27 2012**

<b>ACTIVE INGREDIENTS</b>	
Pyrethrins	0.2%
Clarified Hydrophobic Extract of Neem Oil	70.00%
<b>OTHER INGREDIENTS</b>	29.7%
<b>Total</b>	<b>100.00%</b>

Net Contents 32 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



**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. Remove and wash contaminated clothing before reuse. 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.

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**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 4 times 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 swimming system Do not allow children or pets to enter the treated area until sprays have dried Do not apply directly

to or near water or drainage ditch. 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

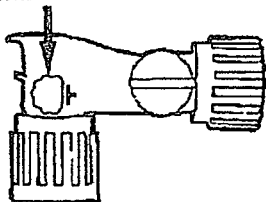
**READY TO SPRAY INSTRUCTIONS**

**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

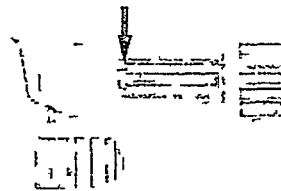
- 1 Insure the large round on/off knob is set to OFF
- 2 Turn on water
- 3 Rotate the small star shaped product control knob to align the flat portion of the knob with the vertical portion of the lock tab and PUSH IN the knob to open This allows product to mix with water
- 4 Hold sprayer and container 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.

**STORAGE AND DISPOSAL**

**Pesticide Storage** Do not store diluted solutions for later use

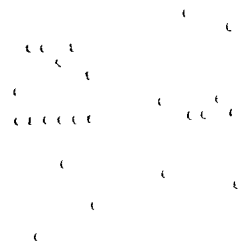
**Pesticide Disposal and Container Handling**  
Nonrefillable container Do not reuse or refill container

**If empty**  
Place in trash or offer for recycling if available

**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.

**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.**

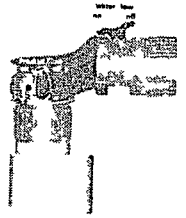


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### Optional Language for Attaching Container to Garden Hose

#### Hose End Spray Use Instructions

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



- 1 Before you start, the blue top water flow valve should be in the "OFF" position and the red product flow valve should be in the up, "OFF" position
- 2 Shake container well and attach it to your garden hose
- 3 Turn on the water from the faucet
- 4 To apply, remove side pin (labeled 'PULL OUT') and rotate red product flow valve to "ON", then while holding sprayer at waist level and pointing in a direction away from face and body, push blue water flow valve forward to activate water
- 5 When you are finished spraying or if you to stop spraying at any time, press blue water flow valve with thumb to the rear to shut off water and return side red valve to the upright "OFF" position and replace side pin
- 6 Turn off the water at the faucet
- 7 Remove the container from the garden hose, then rinse thoroughly and store according to storage instructions

Or –

#### Connect

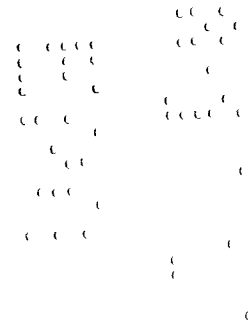
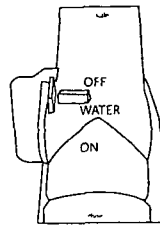
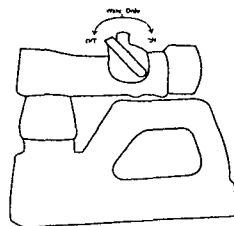
- 1 Shake well before using
- 2 Connect sprayer to hose
- 3 Turn on water

#### Spray

- 1 To begin spraying point nozzle in the direction you want to spray
- 2 Bend small plastic tab back and turn knob to ON position
- 3 Spray evenly to the area to be treated

#### Finish

- 1 To stop spraying turn knob to OFF position
- 2 Turn off water
- 3 Relieve water pressure by turning knob to ON position until water slows to a drip. Then turn knob back to OFF position
- 4 Disconnect sprayer from hose



Covers 5 000 sq ft or equivalent per 32 fl oz container size (Covers 2 500 sq ft or equivalent per 16 fl oz container size)