

20051-111

9/23/2013

1/10



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

SEP 23 2013

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms. Christine A. Dively  
Certis USA  
9145 Guilford Road, Suite 175  
Columbia, Maryland 21046

Subject: Label Notification(s) for Pesticide Registration 98-10

Dear Ms. Dively:

Subject: Notification to Make Label Change  
EPA Registration Number: 70051-111  
Date of Submission: March 22, 2013  
Decision: 481463

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated March 22, 2013 for the product Trilogy XL-O. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The Confidential Statement of Formula (CSF) and/or label submitted with the application has (have been stamped "Notification" and will be placed in our records.

If you have any questions, please contact Melody Banks on 703 305-5413 or via E-mail at [banks.melody@epa.gov](mailto:banks.melody@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken  
Product Manager  
Insecticide Branch  
Registration Division (7504P)



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 70051-111	2. EPA Product Manager Gebken	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Triloqy XL-O	PM# Insecticides	
5. Name and Address of Applicant (Include ZIP Code) Certis U.S.A. L.L.C. 9145 Guilford Road, Suite 175 Columbia, Maryland 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 to EPA Reg. No. <u>SEP 23 2013</u> and labeling to: Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

Addition of container handling statements per PR Notice 2007-4 for container sizes greater than 5 gallons. No other revisions have been made to the EPA accepted label.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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	<input checked="" 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 <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16,32 oz.53-gal, 250 gal.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> 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) 301-483-4806
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 or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Christine A. Dively</i>	3. Title Director of Reg. Affairs	
4. Typed Name Christine A. Dively	5. Date March 22, 2013	



3/10  
Certis USA, L.L.C.  
9145 Guilford Road  
Suite 175  
Columbia, MD 21046  
**(301) 604-7340**  
FAX (301) 604-7015  
www.certisusa.com

March 22, 2013

Mr. Richard Gebken, Product Manager  
Insecticide Branch  
Registration Division (7505P)  
Office of Pesticide Programs  
One Potomac Yard  
2777 South Potomac Drive  
Arlington, VA 22202

Re: Trilogy XL-O; EPA Registration Number 70051-111  
Notification to Add Container Handling Statements per PR Notice 2007-4

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 an amendment to EPA Registration Number 70051-111, to add container handling statements for container sizes greater than 5 gallons. No other revisions have been made to the EPA accepted label.

The following materials are included in this submission:

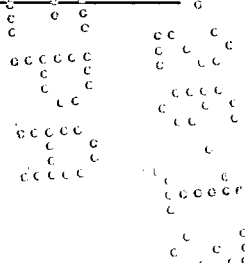
- EPA Form 8570-1; Application for Pesticide
- Certification Statement
- Copy of label highlighting revisions
- Three (3) copies of the draft label (clean)

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,

Christine A. Dively  
Director of Regulatory Affairs

enclosure



4/10

**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



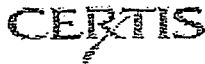
<b>ACTIVE INGREDIENTS:</b>	
Pyrethrins.....	0.25%
Clarified Hydrophobic Extract of Neem Oil.....	70.00%
<b>OTHER INGREDIENTS:</b> .....	29.75%
<b>Total</b> .....	<b>100.00%</b>

Net Contents: 15 fluid ounces  
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**

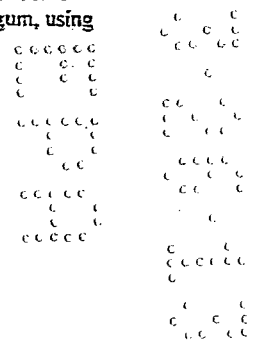
**NOTIFICATION**

**SEP 23 2013**

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.

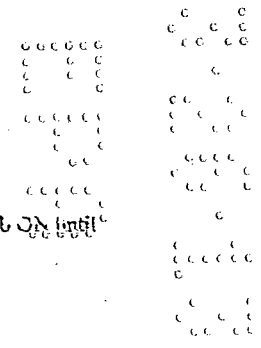
**Mixing Instructions:** Mix Trilogy XL-O at the rate of 2 tablespoons (1 fluid ounce) per gallon of water. Thoroughly mix solution and spray all plant leaf surfaces (including undersides of leaves) until completely wet. Excessive application is unnecessary and to be avoided. Frequently agitate solution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

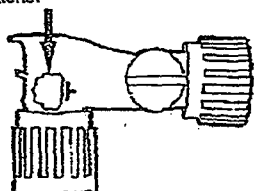
### READY TO SPRAY INSTRUCTIONS

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:

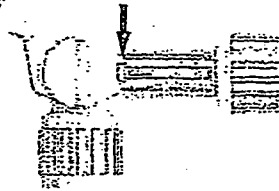
1. Insure the large, round "on/off" knob is set to OFF.
2. Turn on water.
3. Rotate the small, star-shaped product control knob to align the flat portion of the knob with the vertical portion of the lock tab and PUSH IN the knob to open. This allows product to mix with water.
4. Hold sprayer and container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

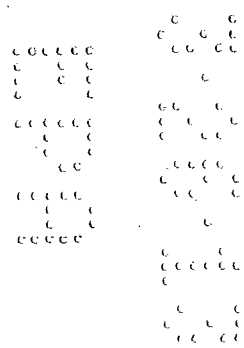
The sprayer attached to the container is ready-to-use. Simply attach to the garden hose and follow these instructions:

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



8/10

-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 in "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**

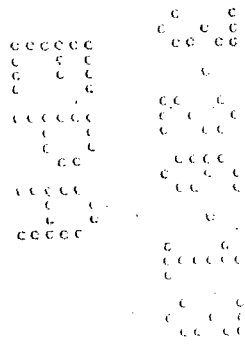
1. Shake well before using.
2. Connect sprayer to hose.
3. Turn on water.

**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.



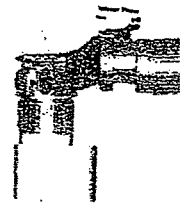


### Optional Language for Attaching Container to Garden Hose

#### 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

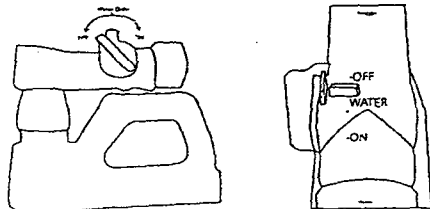
1. Shake well before using
2. Connect sprayer to hose
3. Turn on water

#### 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.)

