

70310-1

02/10/2000

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division
(7511C) 401 M St., S.W.
Washington, D.C. 20460

EPA Reg. Number: 70310-1

Date of Issuance: FEB 10 2000

NOTICE OF PESTICIDE:
[X] Registration
Reregistration

Term of Issuance: Conditional

Name of Pesticide Product: AGRONEEM

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Mr. Shyam K. Chari
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement, or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA section 3(c)(5) and section 4 when the Agency requires all registrants of similar products to submit such data.
2. Make the following label changes listed below before you release the product for shipment:
a. Add the phrase EPA Registration No. 70310-1.

Signature of Approving Official:

Date:

Handwritten signature and note: JstH see next page

Handwritten date: 2/10/00

EPA Form 8570-6

CONCURRENCES

Table with columns for SYMBOL, SURNAME, and DATE. Includes handwritten entries: 7511C, 7511C, Page 2, Kull, 2/10/00, 2/10/00.

3. Because the results of your mouse micronucleus assay (MRID 44840603) indicate the potential for genotoxicity at the limit dose of 2000 mg/kg body weight, you must submit a repeat mammalian erythrocyte micronucleus assay. This study is due within one year of the date of this letter. The study should be conducted as described below.

20 Swiss albino mice (age six to seven weeks with weights of between 21 and 30 grams) should be grouped and receive the following treatment :

- a. 2 groups of 5 female mice should each be treated at the limit dose of 2000 mg Agroneem per kg body weight per mouse. Femoral erythrocytes should be prepared from one group at 24 hours and from the second group just short of 48 hours (~45 hours) after exposure.
- b. 2 groups of 5 female mice each should receive vehicle controls and femoral erythrocytes should be prepared from one group at 24 hours and from the second group just short of 48 hours (~45 hours) after exposure.
- c. Bone marrow cells from each mouse should be sampled for micronucleated erythrocytes (PCE, MN PCE, Total PCE and NCE, MN NCE, Total NCE, total erythrocytes, percent MNE and P/N ratio).

The test material used must be identified according to Batch Number, Date of Manufacture, Date of Expiry and a Certificate of Analysis.

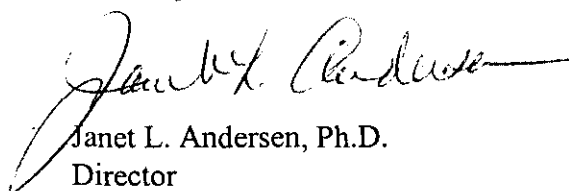
It should be noted that the results of the repeat micronucleus assay may indicate the need for additional toxicity testing.

- 4. You must submit a developmental toxicity study to complete the Tier 1 data requirements. This study is due 2 years from the receipt of this letter.
- 5. Protocol for both the mutagenicity and developmental toxicity study must be submitted within 90 days from the receipt of this letter.
- 6. Submit five(5) copies of the revised final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely,



Janet L. Andersen, Ph.D.
Director

Biopesticides and Pollution
Prevention Division (7511C)

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PRECAUTIONARY STATEMENTS:
HAZARD TO HUMANS AND DOMESTIC ANIMALS
CAUTION
 Harmful if absorbed through skin or if inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing spray. Remove contaminated clothing and wash clothing before reuse. Wash thoroughly with soap and water after handling.

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.

ENVIRONMENTAL HAZARDS
 Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash waters.
 Do not apply this product through any type of irrigation system.
PHYSICAL OR CHEMICAL HAZARDS
 Combustible. Do not use or store near heat or open flame.

Batch No:	ACCEPTED
Manufacturing Date:	
Expiry Date:	

FEB 10 2000
 PRODUCT OF INDIA
 Under the Federal Insecticide, Fungicide, and Rodenticide Act.
 AJAY BIO-TECH (INDIA) LTD. the pesticide
 registered under
 PUN Reg. No. 70310-1

PACKED FOR
Agro Logistic Systems, Inc.
 P.O.Box: 5799
 Diamond Bar, CA 91765
 U.S.A.
 TEL: (800) 425-3388
 FAX: (909) 860-3524

EPA REGISTRATION NO:
 EPA ESTABLISHMENT NO: 070310-IND-001

READ THE ATTACHED BOOKLET BEFORE USING THIS PRODUCT

FOR AGRICULTURAL USE
Agro neem
 Emulsifiable Concentrate

ACTIVE INGREDIENT:
 AZADIRACTIN: 0.15%
 OTHER INGREDIENTS: 99.85%
 TOTAL: 100.00%

(4.8 GRAMS/GALLON ACTIVE INGREDIENT)

Plant Origin
Antifeedant
Insect Repellent
Growth Regulator
Agricultural Insecticide

KEEP OUT OF REACH OF CHILDREN

CAUTION
FIRST AID

If Inhaled: Remove victim to fresh air. If not breathing give artificial respiration, preferably by mouth-to-mouth. Get medical attention.
 If swallowed: Call a physician or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.
 If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists.
 If in Eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

Net contents: 32 FL.OZ.
(1 Quart or 0.947 liter)

DIRECTIONS FOR USE
 It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not apply this product in a 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 requirement specific to your State and Tribe, consult the agency responsible for pesticide regulation.

Refer to the attached booklet for the listing of crops and pests treated, dilution directions and application rates.

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 personnel protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box 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 into 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 laminates or butyl rubber or nitrile rubber or PVC
 - Shoes and socks

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.
Pesticide Storage: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate.
For Commercial Agricultural Use:
Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
Container Disposal: Triple Rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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WARRANTY:

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem; crop condition, 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 risk 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 OFFERED.

FOR ADDITIONAL INFORMATION AND PRODUCT BROCHURE PLEASE CONTACT:

Agro Logistic Systems, Inc.

P.O.Box: 5799

Diamond Bar, CA 91765

U.S.A.

TEL: (800) 425-3388

FAX: (909) 860-3524

e-mail: agro19@worldnet.att.net

Agroneem

PLEASE READ THIS BOOKLET CAREFULLY BEFORE USING AGRONEEM

TANK MIXING:

'AGRONEEM' is compatible with commonly used insecticides, fungicides and foliar fertilizers, like all herbal products.

It is advisable to pre-test the tank mix combination proposed on a few plants to observe phytotoxicity, if any. The climatic conditions and cultural practices may be different in the actual field than experimental conditions. Therefore the responsibility of damage due to tank mix, if any, remains with the user. Since the product is damaged by oxidants it is cautioned that acids and bleaches should not be mixed with AGRONEEM.

MIXING DIRECTIONS:

1. Determine the acreage to be treated with AGRONEEM.
2. Fill tank with appropriate amount of water (see inside for application rates).
3. Add the pre-measured amount of AGRONEEM (see inside for amount to be used).
4. Keep tank agitated with an agitation device. Proper agitation is required, especially when mixing AGRONEEM with other pesticides.

SPRAYING DIRECTIONS:

1. AGRONEEM can be sprayed using a boom system, propeller turbine system (indicated for orchards); pressure hose with gun sprayers, powered back sprayers and manual hand sprayers. We suggest a minimum boom pressure of 160 psi and maximum tractor speed of 2.0 miles per hour. We suggest horizontal nozzles at 10-inch spacing and two vertical drops, one at each end. Each vertical drop should have two nozzles, one at 90° angle and the other at 45° angle.
2. DURING APPLICATION, MAKE SURE THAT THE SPRAY COVERS THE ENTIRE PLANT INCLUDING THE UNDERSIDE OF LEAVES.

GENERAL:

- AGRONEEM is more effective when used as a preventative.
- AGRONEEM is a broad-spectrum herbal insecticide.
- AGRONEEM affects the insects at all stages of growth.
- Diluted AGRONEEM should have a pH ranging from 3 to 8 or else it may degrade.
- SHAKE THE CONTAINER WELL, BEFORE USE.

MAXIMUM APPLICATION RATE IS 20 GRAMS OF ACTIVE INGREDIENT (530 FL. OZ. OR 16 QUARTS OF AGRONEEM E.C.) OR LESS PER ACRE ACCORDING TO TOLERANCE EXEMPTION 40 CFR 180.1119

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DIRECTIONS FOR FOOD CROP APPLICATION:

APPLICATION RATE: ALL APPLICATION RATES ARE FOR ONE (1) ACRE PER CROP

48 oz. AGRONEEM (1-1/2 bottles) mixed with 100 gallons water or sufficient amount of water to ensure total foliar coverage. When applying at early plant stage we recommend dilution of 48 oz. AGRONEEM (1-1/2 bottles) with 50 gallons of water. When applying in high population crops like berries and fruit trees, we recommend dilution of 64 oz. AGRONEEM (2 bottles), with 150 gallons of water.

Repeat application at 7 to 10 day intervals, at least once and if necessary additional times

CROPS	INSECT PESTS/MITES
Top fruits such as Citrus, lemons, Oranges, Apples, Plums, Peaches, Apricots, Avocados, Figs, and Pears.	White Flies, Mealybugs, Leafminers, Thrips, Weevils, Grasshoppers, Fruit Flies, Aphids, San Jose Scale, H Scale, Codling Moth, West Pear Psylla, and Pacific & Two Spotted Spider Mite.
Cucurbits, Watermelons, Gherkins, Squashes, Pumpkins, and Melons.	White Flies, Budworms, Leafminers, Fall Armyworms, Pickle Worms, Cucumber Beetles and Japanese Beetles.
Bulb, Cole and Leafy vegetables such as Broccoli, Brussels sprouts, Cabbage, Celery, Lettuce, Endives, Kale, Parsley, Onions, Garlic, Shallots, Leeks, and Spinach.	White Flies, Cabbage Loopers, Diamondback Moths, Armyworms, Thrips, Leafminers, Onion Maggots, Weevils and Caterpillars.
Root and tuber vegetables such as Beets, Carrots, Ginger, Horseradish, Potatoes, Turnips, Yams, Sweet Potatoes, and Jerusalem Artichokes.	Colorado Potato Beetle, Leaf hopper, Potato Flea Beetles, Aphids, White Flies, Psyllids, Armyworms, and Webworms
Legumes such as Beans, Lentils, Peas, Peanuts, Soybeans and Garbanzo Beans.	Loopers, Leafminers, Caterpillars, Psyllids, Weevils, Beanleaf Beetles, Mexican Beetles, and Colorado Potato Beetles.
Fruiting vegetables such as Tomatoes, Tomatillos, Bell Peppers, Chili Peppers, Eggplant, and Beets.	Loopers, Leafminers, Cabbage Loopers, Caterpillars, Pepper Weevils, Aphids, and Cucumber Beetles.
Blackberries, Blueberries, Currants, Strawberries, Gooseberries, Raspberries, Cranberries, Loganberries, Huckleberries, and Boysenberries	Gypsy Moths, Loopers, Grape Berry Moths, Leafrollers, Thrips, Caterpillars, Tobacco Budworms, Alfalfa worm, Phylloxera and Lygus Bug.
Grapes	Gypsy Moths, Loopers, Grape Berry Moths, Leafrollers, Thrips, Caterpillars, Tobacco Budworms, Alfalfa worm and Phylloxera.
Cotton	White Flies, Thrips, Bollworms, Leafminers, Boll Weevil, Loopers, Leafperforators, Leafhoppers, and Aphids.
Spices and Condiments such as Anise, Basil, Chives, Coriander or Cilantro, Dill, Fennel, Marigold, Peppermint, Sage, and Thyme	Aphids, Flea Beetles and Leafhoppers
Almonds, Pecans, Pistachios, and Walnuts	Aphids, Phylloxera, Leafrollers, Weevils, and Caterpillars

PREVENTATIVE APPLICATION: ALL APPLICATION RATES ARE FOR ONE (1) ACRE OF CROP.

As a preventative application mix 48 oz. (1-1/2 bottles) of AGRONEEM in 50 gallons water or, sufficient amount of water to ensure total foliar coverage. Apply when the plants are tall enough to be susceptible to infestation. We suggest as follows:

- For **Baby Vegetables**, apply 10 days after planting and repeat again in 10 more days.
- For **Regular Vegetables**, apply when the plant has grown two leaves or is 6 inches tall. Repeat application every 15 days.
- For **Fruit Trees**, apply when the tree ends dormancy and continue to repeat applications every 15 days.
(For fruit trees we recommend 64 oz. AGRONEEM i.e. two bottles in 150 gallons of water)
- For **Berries**, apply when the plant ends dormancy and continue to repeat applications every 15 days.
(For berries we recommend 64 oz. AGRONEEM i.e. two bottles in 150 gallons of water)