



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 25, 2017

Matthew Brooks, Ph.D.
Director, Ag-Chem Consulting
Ecostadt Technologies LLC
12644 Chapel Rd, Suite 108
Clifton, VA 20124

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment –
Revise label to incorporate brackets around Azadirachtin content on the Labeling
Product Name: ECOWORKS TECHNICAL
EPA Registration Number: 89152-3
Application Date: 07/26/17
OPP Decision Number: 532007

Dear Dr. Brooks:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false

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or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

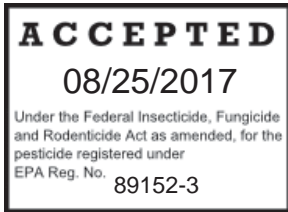
If you have any questions, please contact James Parker by phone at (703) 306-0469 or via email at parker.james@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "For Andrew C. Bryceland". The signature is stylized and written over a faint, illegible background.

Andrew C. Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs

Enclosure



[Note: Texts in [] are optional language]

ECOWORKS TECHNICAL

**BOTANICAL INSECTICIDE, MITICIDE, NEMATOCIDE & FUNGICIDE
TECHNICAL GRADE ACTIVE INGREDIENT FOR MANUFACTURING USE
[Additional Brand Names- ECOHALT TECHNICAL, NEEM WORKS TECHNICAL,
ECOMAXIMA TECHNICAL]**

ACTIVE INGREDIENT: Cold Pressed Neem oil [*].....	100.00%
OTHER INGREDIENTS:	0.00%
TOTAL	100.00%

[* Contains 3000 PPM Azadirachtin]

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID
If on skin (or) clothing: <ul style="list-style-type: none"> • 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 inhaled: <ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
If in eyes: <ul style="list-style-type: none"> • 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.
If swallowed: <ul style="list-style-type: none"> • 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 by a poison control center or doctor. • Do not give anything to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Call your poison control center at 1-800-222-1222. For information on product, usage, call 1-888-858-7378, Seven days a week, 6:30 am to 4.30 pm Pacific Time. During other times, call the poison control center 1-800-222-1222.
FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY: Transportation: Chemtrec 1-800-424-9300 Medical: Hazard information Services (H.I. S1) 800-228-5635, Extension 169.

MANUFACTURED FOR
ECOSTADT TECHNOLOGIES LLC
1024 Iron Point Road, Suite 100-1318
Folsom, CA 95630
Phone: 916-357-6607

Net Contents: 55 & 264.2 GALLONS (208.2 & 1000 Liters)
EPA Reg. # 89152-3
EPA Est. #
Batch No.:

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if inhaled or absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Avoid breathing spray mist. Remove contaminated clothing and wash clothing before use.

ENVIRONMENTAL HAZARDS

For Terrestrial Use Only. This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from treated areas. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wash waters or rinsates.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

PRODUCT INFORMATION

ECOWORKS TECHNICAL is a Technical Grade Active ingredient containing 100% cold pressed Neem oil. ECOWORKS TECHNICAL is used for making end use formulations containing cold pressed Neem oil which controls insects, mites, nematodes and plant diseases in food and non-food plants. ECOWORKS TECHNICAL may be used to formulate products for any new and additional uses not listed as part of this label, if formulators, manufacturers or growers complies with all US-EPA regulatory requirements with regard to such products.

STORAGE AND DISPOSAL

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

Pesticide Storage: Do not store this product above 100 degrees F or below 20 degrees F for extended periods of time. Store in original container in a dry, cool, well-ventilated area.

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

Container Disposal: Non refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill container $\frac{1}{4}$ full with water and recap. Shake 10 seconds. Pour rinsate into application equipment or mix tank or store rinsate for disposal. Drain for 10 seconds after flow begins to drip. Repeat this procedure two more times.

IMPORTANT: PLEASE READ BEFORE USE

LIMITED WARRANTY

ECOSTADT TECHNOLOGIES LLC warrants that to the extent permitted by applicable law (a) this product conforms to chemical description on its label; (b) this product is reasonably fit for purposes stated on its label, subject to inherent risks referred to herein, when used in accordance with its directions; and (c) that directions, cautions and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, and upon reports of field experience. Testing has not been performed on all varieties of food crops, and plants, in all states, or under all application, weather and crop conditions. To the extent permitted by applicable law, there are no express warranties other than those set forth herein. ECOSTADT TECHNOLOGIES LLC neither makes nor intends, nor does it authorize any agent or representative to make, any other warranty, express or implied. To the extent permitted by applicable law, ECOSTADT TECHNOLOGIES LLC expressly excludes and disclaims all implied warranties of merchantability, fitness for particular purpose (or) any other warranty of quality of performance.

To the extent permitted by applicable law, this warranty does not extend to, and user shall be solely responsible for, any loss or damage that results from the use of this product in any manner that is inconsistent with this label's directions, or cautions.

To the extent permitted by applicable law, user's exclusive remedy and ECOSTADT TECHNOLOGIES LLC's or seller's exclusive liability for any claim loss, damage, or injury resulting from use or handling of this product, whether (or) not based in contract, negligence, strict liability in tort, (or) otherwise, shall be limited, at ECOSTADT TECHNOLOGIES LLC's option, to replacement, (or) repayment of the purchase price for, the quantity of product with respect to which damages are claimed.