



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JAN 23 2003

Andrew Kieniksman
Regulatory Specialist
Pace International
1011 Western Avenue
Suite 505
Seattle, WA 98104

SUBJECT: Amendment for DPA Super-Refined Diphenylamine
EPA Reg. No. 64864-39
Your Submission Dated August 5, 2002

Dear Mr. Kieniksman:

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you make the following correction:

1. Under the "Storage and Disposal" heading, change the subheading "Storage" to "Pesticide Storage".

Submit one (1) copy of the revised labeling incorporating the changes listed above. A stamped copy of your label is enclosed.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia Giles-Parker".

for Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure

DPA Super Refined Diphenylamine

FOR MANUFACTURING USE ONLY.
THIS PRODUCT IS ONLY FOR FORMULATION OF PLANT-GROWTH REGULATORS.

ACTIVE INGREDIENT:

Diphenylamine 100.0%

EPA Reg. No. 64864-39

EPA Est. No. 64864-WA-1

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
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 eye. • 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. • If able to swallow, have person sip a large quantity of milk, egg whites, gelatin solution or, if these are not available, water. Avoid alcohol. 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 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, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

Net Contents: 55 Gallons

Product of the USA

Manufactured By:
Pace International LLC
1011 Western Avenue, Suite 505
Seattle, WA 98104
800-936-6750

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JAN 23 2003

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.**

64864-39

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER. Corrosive. Causes irreversible eye damage. Due to corrosive nature, may be harmful or fatal if swallowed. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

DO NOT discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination Systems (NPDES) permit and the permitting authority has been notified in writing prior to discharge. DO NOT discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your state water board or regional office of the EPA.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER
INCONSISTENT WITH ITS LABELING.

This product is for the manufacture of plant-growth regulator end-use products.

DIRECTIONS TO FORMULATORS

DPA Super-Refined Diphenylamine may be used for the manufacture of EPA-registered plant-growth regulator end-use products for use on apples. This product may also be used to formulate products for any additional domestic uses not listed on the label if the formulator, user group or grower has complied with U.S. EPA data submission requirements regarding the support of such uses. Formulators using this product are responsible for obtaining EPA registration of their formulated products intended for use in the USA.

DPA Super-Refined Diphenylamine may also be used for the manufacture of plant-growth regulator end-use products intended for export from the USA.

STORAGE & DISPOSAL

DO NOT contaminate water, food, or feed by storage and disposal.

Storage: Avoid storing below 40°F. In case of spill or leak, absorb liquid with sawdust or other absorbent material and incinerate or dispose of in an approved disposal area (see below).

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Triple rinse (or equivalent) empty container. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

IMPORTANT: Read the information below before using this product. If the terms are not acceptable, you should return the unopened product container immediately for a complete refund.

LIMITED WARRANTY, TERMS OF SALE, AND LIMITATION OF LIABILITY

Upon purchase or use of this product, purchaser and user agree to the following terms:

Warranty: Pace International, LLC (the Company) warrants that this product conforms to the chemical description on the label in all material respects and is reasonably fit for the purpose referred to in the directions for use, subject to the exceptions noted below, which are beyond the Company's control. The Company makes no other representation or warranty, express or implied, concerning the product, including no implied warranty of merchantability or fitness for a

Label text for EPA Reg. No. 64864-39

particular purpose; no such warranty shall be implied by law, and no agent or representative is authorized to make any such warranty on the Company's behalf.

Terms of Sale: The Company's directions for use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, and the manner of use or application (including failure to adhere to label directions), all of which are beyond the Company's control. All such risks are assumed by the user. Sale of this product is governed by the internal laws of the state of Washington; any action with respect to this product shall be brought exclusively in the state or federal courts located at Seattle, Washington U.S.A.

Limitation of Liability: The exclusive remedy against the Company for any cause of action relating to the handling or use of this product is a claim for damages, and in no event shall damages or any other recovery of any kind exceed the price of the product which caused the alleged loss, damage, injury or other claim. Under no circumstances shall the Company be liable for any special, indirect, incidental or consequential damages of any kind, including loss of profits or income, and any such claims are hereby waived.

The Company and the seller offer this product, and the purchaser and user accept this product, subject to the foregoing warranty, terms of sale and limitation of liability, which may be varied or modified only by an agreement in writing signed on behalf of the Company by an authorized representative.

041502 Draft First Aid