

64864-45

8/19/2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

August 19, 2003

Andrew Kieniksmann  
Regulatory Specialist  
Pace International, LLC  
1011 Western Avenue, Suite 807  
Seattle, WA 98104

Subject: **SOPP Soap**  
EPA Registration No. 64864-45  
Your Application Dated July 1, 2003

Dear Mr. Kieniksmann:

The following amendment, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

**Proposed Amendment:**

- Response to PR Notice 2001-1
- Revision to Precautionary Statements

**General Comment:**

Add the word "DANGER" to the precautionary statement subheading.

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,

*Adam Heyward*  
Adam Heyward  
Product Manager (34)  
Regulatory Management Branch II

Administrative Division (7510C)

SYMBOL	Enclosure						
SURNAME							
DATE							

# SOPP Soap

A Postharvest Fungicidal Cleaner for Citrus and Pears

**ACTIVE INGREDIENT:**  
 Sodium Ortho-phenylphenate (anhydrous)..... 13.0%  
**INERT INGREDIENTS:** ..... 87.0%  
**Total..... 100.0%**

EPA Reg. No. 64864-45

EPA Est. No. 64864-WA-1

## KEEP OUT OF REACH OF CHILDREN DANGER

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**Corrosive.** Causes irreversible eye damage. Causes skin burns. Harmful if swallowed. Do not get in eyes, or on skin or clothing. Wear goggles or face shield when handling. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

<b>FIRST AID</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin with plenty of water for 15 – 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>

**Net Contents: 55 Gallons/208 Liters**

A-SOPPSO-AA055GL  
Lot # \_\_\_\_\_

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

AUG 19 2003

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 64864-45

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish and aquatic organisms. For terrestrial uses, 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 disposing of equipment washwaters.

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.

**Citrus:** Postharvest control of blue, gray, green molds, stem-end rot and citrus canker. This product is concentrated and should be diluted one (1) gallon SOPP Soap with nine (9) gallons of water to make a 2% sodium ortho-phenylphenate tetrahydrate treating solution. Apply as a spray, flood or dip with contact period of 30 to 60 seconds. Flush fruit with fresh water after treatment.

**Tolerance** - 10 ppm from postharvest application expressed as o-phenylphenol.

**Pears:** Postharvest control of bacterial and fungal decay rots. This product is concentrated and should be diluted one (1) gallon SOPP Soap with nine (9) gallons of water to make a 2% sodium ortho-phenylphenate tetrahydrate treating solution. Apply as a spray, flood or dip with contact period of 15 to 30 seconds. Flush fruit with fresh water after treatment.

**Tolerance** - 25 ppm from postharvest application expressed as o-phenylphenol.

\*Not for use in California for control of Citrus Canker or on Pears.

**STORAGE & DISPOSAL**

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

**Pesticide Storage:** Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water.

**Pesticide Disposal:** Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer.

**Container Disposal:** Do not reuse empty container. Triple rinse (or equivalent). 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.

**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 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.

ACCEPTED  
WITH COMMENTS  
EPA Letter Dated:

~~XXXXXXXXXX~~ AUG 19 2003

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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.

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EPA Letter Dated:  
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