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05/02/2005

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

MAY 2 2005

Subject: Shield-Brite TBZ
EPA Reg. No. 64864-47
Your amendment dated January 26, 2005

Dear Mr. Kieniksmann:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

1. On page 2 (212 gram package label directions), change "Dilute 212 g. of Shield-Brite TBZ in 55 gallons...." to "Dilute 212 g. of Shield-Brite TBZ in 56 gallons...."

One copy of the label stamped "Accepted with comments" is enclosed for your records. This label supercedes all labels previously accepted for this product. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Cynthia Giles-Parker".

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

Enclosure

2/0

Shield-Brite® TBZ

A FUNGICIDE FOR POST-HARVEST TREATMENT OF APPLES & PEARS, CARROTS, CITRUS FRUITS AND POTATOES

Active Ingredient:
 2-(4-thiazolyl)-benzimidazole (TBZ).....99.5%
 Inert Ingredients:.....0.5%
Total.....100.0%

EPA Reg.No. 64864-47

EPA Est.No. 64864-WA-01

Keep Out of Reach of Children CAUTION

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Do not give any liquid to the person. 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 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 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.

PRECAUTIONARY STATEMENTS

Hazards to humans and domestic animals:

Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Avoid breathing dust. Wear chemical resistant gloves and protective clothing when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt
- Long pants
- Chemical resistant gloves
- Shoes plus socks
- NIOSH-approved respirator with any N, R, P or HE filter

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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 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 to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAY 2 2005

Under the Federal Insecticide, Fungicide, and Herbicide Act (FIFRA) of 1972, this product has been registered for the use and sale described on the label.

64864-47

3/10

(212 gram package label directions)

DIRECTIONS FOR USE

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

APPLES & PEARS: Post-harvest control of *Botrytis* and *Penicillium* Rots. As spray or drench: Dilute 212 g of Shield-Brite TBZ in 55 gallons of water to yield 1000 ppm TBZ. Keep suspension under constant gentle agitation. Do not treat fruit for more than 3 minutes. Treat only once, either before or after storage. Drain fruit thoroughly after treatment and do not rinse.

In wax: Dilute 212 g Shield-Brite TBZ in 28 gal. of apple wax to yield 2000 ppm TBZ. Spray suspension full strength at a rate of 1 gal per 8,000-10,000 pounds of fruit. Agitate wax suspension during application.

CARROTS: Post-harvest control of *Botrytis* Gray Mold and *Sclerotinia* Rot. Dilute 212 g Shield-Brite TBZ per 37.3 gal. water (1500 ppm) and apply before storage as an aqueous dip for up to 10 minutes. Replenish dip suspension when volume is too low or when it becomes dirty.

CITRUS FRUITS: Post-harvest control of *Penicillium* Molds and Stem End Rot. In AZ and CA, dilute up to 212 g Shield-Brite TBZ per 11 gal. of citrus wax (5000 ppm) and apply a single application of 1 gal. wax suspension / 3500 lbs fruit. Agitate wax suspension during application. In FL and TX, 2 sequential applications may be applied: First, dilute up to 212 g Shield-Brite TBZ per 55 gal. water (1000 ppm) and apply as an aqueous dip for up to 3 minutes before de-greening. Replenish dip suspension when volume is too low or when it becomes dirty. After de-greening and washing, mix 212 g Shield-Brite TBZ in 55 to 15.7 gal. citrus wax (1000-3500 ppm) and apply 1 gal. wax suspension / 3500 lbs fruit.

POTATOES: Post-harvest control of *Fusarium* Tuber Rot. Before storage, mist unwashed tubers on a conveyor line with tumbling action, using 5.68 g Shield-Brite TBZ per 2000 lbs tubers in sufficient water for complete coverage. If needed before shipping, tubers may be retreated after at least 30 days storage, using either a 2nd mist as described above or a 20 second dip of 5.68 g Shield-Brite TBZ per gal. water. Replenish dip suspension when volume is too low or when it becomes dirty.

For Seedpiece Potatoes, mist unwashed tubers before storage as described above. DO NOT retreat. DO NOT treat after cutting.

Shield-Brite TBZ should be used as part of an Integrated Management Program for potatoes, which includes prevention of bruising during harvest and maintaining proper storage temperatures and relative humidity. Neither cultural practices nor TBZ treatment will prevent *Fusarium* infection if potatoes are damaged or improperly stored.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Store in a cool, dry place.

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: - Completely empty foil bag into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Dispose of foil bags and outer case in a sanitary landfill or by incineration, or, if allowed by State and local Authorities, by burning. If burned, stay out of smoke.

Shield-Brite is a registered trademark of Pace International, LLC

SKU: A-SBTBZX-AA0-212GR
012005EPA-DRAFT

Net Weight: 212 grams

Manufactured For:
Pace International LLC
1011 Western Ave, Suite 807
Seattle, WA 98104
PHONE 800-936-6750
FAX 800-936-6758

4/6

(318 gram package label directions)

DIRECTIONS FOR USE

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

APPLES & PEARS: Post-harvest control of *Botrytis* and *Penicillium* Rots. As spray or drench: Dilute 318 g of Shield-Brite TBZ in 83.5 gallons of water to yield 1000 ppm TBZ. Keep suspension under constant gentle agitation. Do not treat fruit for more than 3 minutes. Treat only once, either before or after storage. Drain fruit thoroughly after treatment and do not rinse.

In wax: Dilute 318 g Shield-Brite TBZ in 42 gal. of apple wax to yield 2000 ppm TBZ. Spray suspension full strength at a rate of 1 gal per 8,000-10,000 pounds of fruit. Agitate wax suspension during application.

CARROTS: Post-harvest control of *Botrytis* Gray Mold and *Sclerotinia* Rot. Dilute 318 g Shield-Brite TBZ per 55 gal. water (1500 ppm) and apply before storage as an aqueous dip for up to 10 minutes. Replenish dip suspension when volume is too low or when it becomes dirty.

CITRUS FRUITS: Post-harvest control of *Penicillium* Molds and Stem End Rot. In AZ and CA, dilute up to 318 g Shield-Brite TBZ per 16.5 gal. of citrus wax (5000 ppm) and apply a single application of 1 gal. wax suspension / 3500 lbs fruit. Agitate wax suspension during application. In FL and TX, 2 sequential applications may be applied: First, dilute up to 318 g Shield-Brite TBZ per 83.5 gal. water (1000 ppm) and apply as an aqueous dip for up to 3 minutes before de-greening. Replenish dip suspension when volume is too low or when it becomes dirty. After de-greening and washing, mix 318 g Shield-Brite TBZ in 83.5 to 24 gal. citrus wax (1000-3500 ppm) and apply 1 gal. wax suspension / 3500 lbs fruit.

POTATOES: Post-harvest control of *Fusarium* Tuber Rot. Before storage, mist unwashed tubers on a conveyor line with tumbling action, using 5.68 g Shield-Brite TBZ per 2000 lbs tubers in sufficient water for complete coverage. If needed before shipping, tubers may be retreated after at least 30 days storage, using either a 2nd mist as described above or a 20 second dip of 5.68 g Shield-Brite TBZ per gal. water. Replenish dip suspension when volume is too low or when it becomes dirty.

For Seedpiece Potatoes, mist unwashed tubers before storage as described above. DO NOT retreat. DO NOT treat after cutting.

Shield-Brite TBZ should be used as part of an Integrated Management Program for potatoes, which includes prevention of bruising during harvest and maintaining proper storage temperatures and relative humidity. Neither cultural practices nor TBZ treatment will prevent *Fusarium* infection if potatoes are damaged or improperly stored.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Store in a cool, dry place.

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: - Completely empty foil bag into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Dispose of foil bags and outer case in a sanitary landfill or by incineration, or, if allowed by State and local Authorities, by burning. If burned, stay out of smoke.

Shield-Brite is a registered trademark of Pace International, LLC

SKU: A-SBTBZX-AA0-318GR

012005EPA-DRAFT

Net Weight: 318 grams

Manufactured For:
Pace International LLC
1011 Western Ave, Suite 807
Seattle, WA 98104
PHONE 800-936-6750
FAX 800-936-6758

5/10

(575 gram package label directions)

DIRECTIONS FOR USE

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

APPLES & PEARS: Post-harvest control of *Botrytis* and *Penicillium* Rots. As spray or drench: Dilute 575 g of Shield-Brite TBZ in 151 gallons of water to yield 1000 ppm TBZ. Keep suspension under constant gentle agitation. Do not treat fruit for more than 3 minutes. Treat only once, either before or after storage. Drain fruit thoroughly after treatment and do not rinse.

In wax: Dilute 575 g Shield-Brite TBZ in 75.5 gal. of apple wax to yield 2000 ppm TBZ. Spray suspension full strength at a rate of 1 gal per 8,000-10,000 pounds of fruit. Agitate wax suspension during application.

CARROTS: Post-harvest control of *Botrytis* Gray Mold and *Sclerotinia* Rot. Dilute 575 g Shield-Brite TBZ per 100 gal. water (1500 ppm) and apply before storage as an aqueous dip for up to 10 minutes. Replenish dip suspension when volume is too low or when it becomes dirty.

CITRUS FRUITS: Post-harvest control of *Penicillium* Molds and Stem End Rot. In AZ and CA, dilute up to 212 g Shield-Brite TBZ per 30 gal. of citrus wax (5000 ppm) and apply a single application of 1 gal. wax suspension / 3500 lbs fruit. Agitate wax suspension during application. In FL and TX, 2 sequential applications may be applied: First, dilute up to 575 g Shield-Brite TBZ per 151 gal. water (1000 ppm) and apply as an aqueous dip for up to 3 minutes before de-greening. Replenish dip suspension when volume is too low or when it becomes dirty. After de-greening and washing, mix 575 g Shield-Brite TBZ in 151 to 43 gal. citrus wax (1000-3500 ppm) and apply 1 gal. wax suspension / 3500 lbs fruit.

POTATOES: Post-harvest control of *Fusarium* Tuber Rot. Before storage, mist unwashed tubers on a conveyor line with tumbling action, using 5.68 g Shield-Brite TBZ per 2000 lbs tubers in sufficient water for complete coverage. If needed before shipping, tubers may be retreated after at least 30 days storage, using either a 2nd mist as described above or a 20 second dip of 5.68 g Shield-Brite TBZ per gal. water. Replenish dip suspension when volume is too low or when it becomes dirty.

For Seedpiece Potatoes, mist unwashed tubers before storage as described above. DO NOT retreat. DO NOT treat after cutting.

Shield-Brite TBZ should be used as part of an Integrated Management Program for potatoes, which includes prevention of bruising during harvest and maintaining proper storage temperatures and relative humidity. Neither cultural practices nor TBZ treatment will prevent *Fusarium* infection if potatoes are damaged or improperly stored.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Store in a cool, dry place.

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: - Completely empty foil bag into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Dispose of foil bags and outer case in a sanitary landfill or by incineration, or, if allowed by State and local Authorities, by burning. If burned, stay out of smoke.

Shield-Brite is a registered trademark of Pace International, LLC

SKU: A-SBTBZX-AA0-575GR

012005EPA-DRAFT

Net Weight: 575 grams

Manufactured For:
Pace International LLC
1011 Western Ave, Suite 807
Seattle, WA 98104
PHONE 800-936-6750
FAX 800-936-6758

6/10

(742 gram package label directions)

DIRECTIONS FOR USE

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

APPLES & PEARS: Post-harvest control of *Botrytis* and *Penicillium* Rots. As spray or drench: Dilute 742 g of Shield-Brite TBZ in 195 gallons of water to yield 1000 ppm TBZ. Keep suspension under constant gentle agitation. Do not treat fruit for more than 3 minutes. Treat only once, either before or after storage. Drain fruit thoroughly after treatment and do not rinse.

In wax: Dilute 742 g Shield-Brite TBZ in 97.5 gal. of apple wax to yield 2000 ppm TBZ. Spray suspension full strength at a rate of 1 gal per 8,000-10,000 pounds of fruit. Agitate wax suspension during application.

CARROTS: Post-harvest control of *Botrytis* Gray Mold and *Sclerotinia* Rot. Dilute 742 g Shield-Brite TBZ per 130 gal. water (1500 ppm) and apply before storage as an aqueous dip for up to 10 minutes. Replenish dip suspension when volume is too low or when it becomes dirty.

CITRUS FRUITS: Post-harvest control of *Penicillium* Molds and Stem End Rot. In AZ and CA, dilute up to 742 g Shield-Brite TBZ per 39 gal. of citrus wax (5000 ppm) and apply a single application of 1 gal. wax suspension / 3500 lbs fruit. Agitate wax suspension during application. In FL and TX, 2 sequential applications may be applied: First, dilute up to 742 g Shield-Brite TBZ per 195 gal. water (1000 ppm) and apply as an aqueous dip for up to 3 minutes before de-greening. Replenish dip suspension when volume is too low or when it becomes dirty. After de-greening and washing, mix 742 g Shield-Brite TBZ in 195 to 55 gal. citrus wax (1000-3500 ppm) and apply 1 gal. wax suspension / 3500 lbs fruit.

POTATOES: Post-harvest control of *Fusarium* Tuber Rot. Before storage, mist unwashed tubers on a conveyor line with tumbling action, using 5.68 g Shield-Brite TBZ per 2000 lbs tubers in sufficient water for complete coverage. If needed before shipping, tubers may be retreated after at least 30 days storage, using either a 2nd mist as described above or a 20 second dip of 5.68 g Shield-Brite TBZ per gal. water. Replenish dip suspension when volume is too low or when it becomes dirty.

For Seedpiece Potatoes, mist unwashed tubers before storage as described above. DO NOT retreat. DO NOT treat after cutting.

Shield-Brite TBZ should be used as part of an Integrated Management Program for potatoes, which includes prevention of bruising during harvest and maintaining proper storage temperatures and relative humidity. Neither cultural practices nor TBZ treatment will prevent *Fusarium* infection if potatoes are damaged or improperly stored.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Store in a cool, dry place.

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: - Completely empty foil bag into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Dispose of foil bags and outer case in a sanitary landfill or by incineration, or, if allowed by State and local Authorities, by burning. If burned, stay out of smoke.

Shield-Brite is a registered trademark of Pace International, LLC

SKU: A-SBTBZX-AA0-742GR

012005EPA-DRAFT

Net Weight: 742 grams

Manufactured For:
Pace International LLC
1011 Western Ave, Suite 807
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FAX 800-936-6758