

64864-53

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Andrew Kieniksman  
Product Registration  
Pace International, LLC  
5661 Branch Road  
Wapato, WA 98951

MAY 8 2009

SUBJECT: Application for Pesticide Notification (PRN 98-10)  
Request General Label Change  
EPA Reg. No. 64864-53  
Application Dated April 16, 2009

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 04/16/09 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 64864-53	2. EPA Product Manager T. Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ecoFOG-100	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) Pace International, LLC 5661 Branch Road Wapato, WA 98951 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>NOTIFICATION</u> Product Name <u>MAY 08 2009</u>	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)  
Notification per PR Notice 98-10 to add the product claim "Post Harvest Diphenylamine" to the label.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container

3. Location of Net Contents Information  
 Label  Container

4. Size(s) Retail Container

5. Location of Label Directions  
 On Label  On Labeling accompanying product

6. Manner in Which Label is Affixed to Product  
 Lithograph  Paper glued  Stenciled  Other \_\_\_\_\_

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Andrew Kieniksman	Title Regulatory Supervisor	Telephone No. (Include Area Code) 206-331-4713
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**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.

2. Signature 	3. Title Regulatory Supervisor	6. Date Application Received (Stamped)
4. Typed Name Andrew Kieniksman	5. Date April 16, 2009	

DA BIPRA...  
 TO...  
 BY...  
**April 16, 2009**  
**Document Processing Desk (NOTIF)**  
**Office of Pesticide Programs (7504P)**  
**U.S. Environmental Protection Agency**  
**1200 Pennsylvania Ave. NW**  
**Washington, D.C. 20460**

**Subject:** ecoFOG-100, EPA Reg. No. 64864-53  
 Notification to add product description to labeling

Enclosed is a notification to add the product description "Post Harvest Diphenylamine" to the label of ecoFOG-100, EPA Reg. No. 64864-53.

The following documents are provided in support of this notification:

- EPA Form 8570-1
- One copy of the EPA Master Label for Reg. No. 64864-53, incorporating the description "Post Harvest Diphenylamine" below the product name.

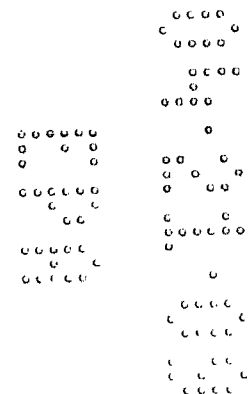
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If you have any questions or require any further clarification, I may be reached at 206-331-4713 or via e-mail at [andykieniksman@paceint.com](mailto:andykieniksman@paceint.com).

Sincerely,



Andrew Kieniksman  
 Supervisor, Regulatory Affairs  
 Pace International, LLC



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ecoFOG-100

Post Harvest Diphenylamine
Antiscald Agent for Post-Harvest Treatment of Apples by Thermal Fogging

ecoFOG-100 is recommended for reducing scald damage to apples while in storage.

ecoFOG-100 is a special liquid form of diphenylamine intended for use with a Xeda Brand Thermal Electrofogger to form a fine fog.

NOTIFICATION

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Table with 2 columns: Ingredient Name and Percentage. Rows include Diphenylamine (10%), OTHER INGREDIENTS (90%), and Total (100%).

EPA Reg. No. 64864-53

EPA Est. No. 64864-WA-1

KEEP OUT OF REACH OF CHILDREN
CAUTION - CUIDADO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

Table with 2 columns: Situation and First Aid Instructions. Rows include 'If swallowed', 'If in eyes', and a general instruction to have the product container when calling for help.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Caution. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear eye protection (such as goggles, safety glasses, or a face shield) when mixing and loading. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA Chemical Resistance Selection Sheet.

Handlers (including mixers, loaders, persons cleaning or monitoring the fogging equipment, and persons handling treated apples or apple containers still wet with DPA) must wear:

- long-sleeved shirt and long pants
• chemical-resistant gloves made of any waterproof material such as polyvinyl chloride, nitrile rubber, or butyl rubber
• shoes and socks
• protective eyewear (such as goggles, safety glasses, or a face shield)

Fogging applicators must wear:

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- full-face respirator with organic vapor filter
- long-sleeved shirt and long pants
- chemical-resistant gloves made of any waterproof material such as polyvinyl chloride, nitrile rubber, or butyl rubber
- shoes and socks

User Safety Requirements

Discard clothing or other absorbent materials that have been fogged or heavily contaminated with the product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/handling 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.
- Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Re-Entry

Entry into the treatment area by any person other than properly trained and equipped handlers is prohibited from the start of application until the treated area is ventilated as follows:

- 8 hours with no ventilation followed by 1 hour of mechanical ventilation
- 24 hours with no ventilation

In case it is necessary to enter the treatment area during treatment or before ventilation requirements have been met, handlers must wear chemical resistant headgear and a self-contained breathing apparatus (SCBA, MSHA/NIOSH approval number prefix TC-13F) in addition to PPE listed under PRECAUTIONARY STATEMENTS.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and aquatic invertebrates. Do not contaminate water by cleaning of equipment or disposing of equipment washwater or rinsate. 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 System (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.

**PHYSICAL OR CHEMICAL HAZARDS**

**Combustible.** Do not use or store near heat or open flame.

**DIRECTIONS FOR USE**

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

Application Restrictions

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. Consult Agricultural Experiment Station or Extension Service pomology specialists for current recommended DPA use-solution concentrations for local apple varieties.

Recommendations

- Treat only dry fruit as received from the field.
- Apply to fruit within 15 days after harvesting, prior to placing in storage.

- In case of prolonged storage (more than 4 months) or particularly high danger of scald due to climatological conditions, a second treatment is advisable between the second and third months of storage. This second treatment must be applied at a rate of between 50% and 100% of the initial dosage, depending on the importance of the danger and the length of further storage. A second treatment of 100% of the first dose is recommended for any additional storage of 3 months or longer.
- Before treatment, fruit in bins must be protected on top with plastic liners, cardboard sheets or Kraft sheets. Fruit directly in front of the fogging equipment should also be protected with liners or sheets from top to bottom.
- In case of treatment of a room that is not completely filled, calculate the dosage of ecoFOG-100 by adding a tonnage value of 20% of the empty volume to the real tonnage of the fruit.

#### Application Rate

Apple Variety	Application Rate per US Ton
Granny Smith	4.4 oz (125 g)
Red Delicious	3.9 oz (110 g)
Braeburn, Fuji, Idared	2.8 oz (80 g)
Cortland, Empire, Jonagold, McIntosh, Rome Beauty, Royal Gala, Staymin, Winesap	2.3 oz (65 g)
Golden Delicious	1.2-1.6 oz (35-45 g)

#### Electrofogger Operation

- Place the Electrofog machine horizontally outside the treatment room at a height of about 3 feet from the floor. Cover the door or window to the treatment room with a plastic sheet and insert the fogging pipe through a hole in the plastic. Place a bucket under the nozzle to catch any drops. Seal the opening around the nozzle with duct tape.
- Set the Electrofog machine resistance temperature between between 500° to 600° C.
- Insert input pipe into product container and start pump. Stop pump when product reaches the pump body.
- Start fan and resistance, and start pump again when fog exit temperature reaches 180°C. Adjust pump as necessary during operation to maintain 180°C.

#### Application Procedures

- Avoid breathing the fog.
- Turn off room cooling systems and humidifiers 12 hours prior to and during treatment.
- Turn off room circulation fans immediately prior to and during treatment.
- Allow the fog to stay overnight or until the fog has totally disappeared (about 5 hours post-treatment) before restarting fans and cooling systems.
- DO NOT rinse apples after treatment.
- DO NOT apply to fruit treated with Diphenylamine prior to harvest.
- DO NOT use treated apples for pomace or livestock feed as illegal residues may occur in meat or milk.
- DO NOT wrap apples in Diphenylamine-treated paper.
- Fruit must have shipping carton marked: "Treated with Diphenylamine to retard spoilage"

#### Re-Entry

Entry into the treatment area by any person other than properly trained and equipped handlers is prohibited from the start of application until the treated area is ventilated as follows:

- 8 hours with no ventilation followed by 1 hour of mechanical ventilation
- 24 hours with no ventilation

In case it is necessary to enter the treatment area during treatment or before ventilation requirements have been met, handlers must wear chemical resistant headgear and a self-contained breathing apparatus (SCBA, MSHA/NIOSH approval number prefix TC-13F) in addition to PPE listed under PRECAUTIONARY STATEMENTS.

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Check for Post-Treatment Signs of Scald.

In years of severe scald development, ecoFOG-100 may not give desired control or other factors may reduce its effectiveness. After several months of storage, collect samples of fruit periodically (every 2 or 3 weeks) and hold them at room temperature to assess Scald development. Fruit lots showing scald can often be marketed immediately.

**STORAGE AND DISPOSAL**

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

**PESTICIDE 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 it in approved disposal area.

**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 by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**NOTICE TO BUYER**

**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 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. Except as expressly stated in the foregoing sentence, the Company makes no further warranties, and expressly disclaims, any implied warranties of merchantability or fitness for a particular purpose and any representation or warranty as to the suitability or efficacy of the product as a fruit preservative or the efficacy of the electrofoggng process.

**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, USA.

**Limitations 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.

MADE IN USA

NET CONTENTS: \_\_\_\_\_

Manufactured By:  
Pace International LLC  
5661 Branch Road  
Wapato WA 98951  
800.936.6750  
www.paceint.com

**NOTIFICATION**

**MAY 08 2009**

