



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 3, 2020

Audrey Sehn
Regulatory Affairs Manager
Pace International LLC
5661 Branch Road
Wapato, WA 98951

Subject: Registration Review Label Mitigation for Diphenylamine
Product Name: EFOG-170 DPA
EPA Registration Number: 64864-69
Application Dates: 10/5/2019
Decision Numbers: 555998

Dear Ms. Sehn:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Diphenylamine Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements 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 Agency find or if it is brought to our attention that a website contains false 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.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

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If you have any questions about this letter, please contact Darius Stanton by phone at 703-347-0433, or via email at Stanton.darius@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

eFOG-170 DPA

**Postharvest Diphenylamine
Antiscald Agent for Postharvest Treatment of Apples by Thermal Fogging**

eFOG-170 DPA is recommended for reducing scald damage to apples while in storage. eFOG-170 DPA is a special liquid form of diphenylamine intended for use with a thermal electrofogger to form a fine fog.

ACTIVE INGREDIENT:

Diphenylamine 17%

OTHER INGREDIENTS: 83%

Total 100%

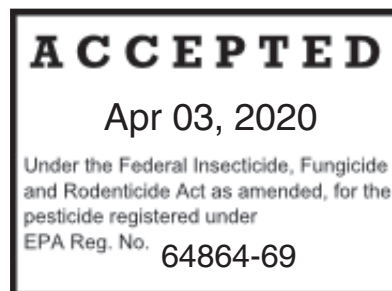
EPA Reg. No. 64864-69

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.)

| FIRST AID | |
|---|--|
| 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 do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| 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 on skin | <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. |
| Have the product container or label with you when calling a poison control center or doctor or going for treatment. | |
| HOT LINE NUMBER Medical Emergency Phone Number 888-271-4649 (PROSAR) Transportation Emergency Phone Number 800-424-9300 (CHEMTREC) | |



PRECAUTIONARY STATEMENTS**Hazards to Humans and Domestic Animals**

Caution. Harmful if absorbed through skin or if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin 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)

Applicators must wear long-sleeved-shirts, long pants, shoes and socks, chemical resistant gloves made of any water proof material such as polyvinyl chloride, nitrile rubber or butyl rubber, and a minimum of a NIOSH-approved elastomeric full mask respirator with organic vapor (OV) cartridges and combination N, R or P filters; or a NIOSH-approved gas mask with OV canisters.

Handlers (including mixers, loaders, persons cleaning or setting-up and/or monitoring the fogging equipment, and persons handling treated apples and/or apple containers still wet with the active ingredient) must wear long-sleeved shirt, long pants, shoes and socks, chemical-resistant gloves made of any waterproof material such as polyvinyl chloride, nitrile rubber, or butyl rubber, and goggles

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.

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. Do not store near or use with oxidizing agents.

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.

Preparation for Fogging

- 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, protect fruit in bins at the top of each stack with plastic liners, cardboard or Kraft paper sheets. Also protect fruit directly in front of the fogging equipment with liners or sheets from top to bottom.
- When treating rooms that are less than 75% full, calculate the dosage of eFOG-170 DPA 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 | 2.6 fl oz (75 mL) |
| Red Delicious | 2.3 fl oz (65 mL) |
| Braeburn, Cortland, Fuji, Idared, McIntosh | 1.7 fl oz (47 mL) |
| Empire, Jonagold, Rome Beauty, Royal Gala, Staymin, Winesap | 1.3 fl oz (38 mL) |
| Golden Delicious | 0.7 - 0.9 fl oz (20 - 26 mL) |

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.
- Set the Electrofog machine resistance temperature 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 diphenylamine to apples before harvest.
- DO NOT use treated apples for pomace or livestock feed as illegal residues may occur in meat or milk.
- DO NOT apply diphenylamine to apples via treated wrapping papers..
- Fruit must have shipping carton marked: "Treated with Diphenylamine to retard spoilage."

Posting

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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.

Check for Post-Treatment Signs of Scald.

In years of severe scald development, eFOG-170 DPA 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 HANDLING: (Containers equal to or less than 5 gallons): Nonrefillable container.

Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

(Containers greater than 5 gallons): Nonrefillable container. Do not reuse or refill this container.

Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip the container on its side and roll it back and forth, ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

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. To the extent consistent with applicable law, 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.

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. To the extent consistent with applicable law, all such risks are assumed by the user.

Limitations of Liability: To the extent consistent with applicable law, 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. To the extent consistent with applicable law, 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.

To the extent consistent with applicable law, 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