



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 4, 2026

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

Subject: Label Amendment - Registration Review Mitigation for Thiabendazole  
Product Name: eFOG – 100 TBZ  
EPA Registration Number: 64864-71  
Case Number: 476504  
Application Dates: February 19, 2021

Dear Audrey 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 Thiabendazole 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 Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for

shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Nick Barnett by phone at 513-569-7643, or via email at Barnett.nicholas@epa.gov.

Sincerely,



Julie Javier, Team Leader  
Risk Mitigation and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

ENCLOSURE: Stamped label

THIABENDAZOLE	GROUP	1	FUNGICIDE
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## eFOG-100 TBZ

Postharvest Thiabendazole

Fungicide for Postharvest Pome Fruit Treatment by Thermal Fogging

eFOG-100 TBZ is a liquid form of thiabendazole intended for use with a thermal electrofogger to form a fine fog.

Active Ingredient:

2-(4-thiazolyl)-benzimidazole (thiabendazole - TBZ) .....	10%
Inert Ingredients: .....	<u>90%</u>
Total.....	100%

EPA Reg. No. 64864-71

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"> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have a 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.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If in eyes	<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>
If on skin	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15 – 20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled	<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>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the poison control center at 1-800-222-1 222.	

NET CONTENTS: \_\_\_ Gallons (\_\_\_Liters)

Manufactured By:

Pace International LLC  
5661 Branch Road  
Wapato, WA 98951  
800-936-6750

**ACCEPTED**

Feb 4, 2026

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under  
EPA Reg. No. 64864-71

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION.** Harmful if swallowed or absorbed through the skin. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

### Personal Protective Equipment (PPE)

Handlers (including mixers, loaders, persons cleaning or setting up the fogging equipment, arc! persons handling treated fruit still wet with product) and fogging applicators must wear:

- Long-sleeved shirt and long pants
- Chemical resistant gloves
- Shoes and socks
- Protective eyewear (such as goggles, safety glasses, or a face shield)

While respiratory protection is not normally required when using this product, fogging applicators must keep a full face respirator readily available in case of rare instances where fog may be blown back to the applicator, such as an equipment malfunction or insufficient room seal. Acceptable respirators include a NIOSH-approved respirator with an organic-vapor (OV) removing cartridge and a combination N, R, or P filter with NIOSH approval number prefix 84A; NIOSH approved gas mask with an organic vapor canister with NIOSH approval number prefix TC - 14G; or a NIOSH approved powered air purifying respirator with organic vapor (OV) cartridge and combination HE filter with NIOSH approval number prefix TC 23C.

Using a program that conforms to OSHA's requirements (see 29 CFR Part 1910.134), employers must verify that any handler who uses a respirator is: fit-tested and fit-checked, trained, and examined by a qualified medical practitioner to ensure physical ability to safely wear the style of respirator to be worn. A qualified medical practitioner is a physician or other licensed health care professional who will evaluate the ability of a worker to wear a respirator. The initial evaluation consists of a questionnaire that asks about medical conditions (such as a heart condition) that would be problematic for respirator use. If concerns are identified, then additional evaluations, such as a physical exam, might be necessary. The initial evaluation must be done before respirator use begins. Handlers must be re-examined by a qualified medical practitioner if their health status of respirator style or use-conditions change. Upon request by local/state/federal/tribal enforcement personnel, employers must provide documentation demonstrating how they have complied with these requirements.

#### User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing or other absorbent materials that have been fogged or heavily contaminated with the product's concentrate. Do not reuse them.

#### User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Users should remove clothing/PPE 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**

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.

## **DIRECTIONS FOR USE**

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

### Product Information

eFOG-100 TBZ is a postharvest fungicide which aids in the control of many important plant diseases such as Blue Mold Rot, Bull's Eye Rot, Gray Mold (Nest Rot, Cluster Rot), Stem End and Neck Rot. If treatment is not effective following use of eFOG-100 TBZ as recommended, a tolerant strain of fungus may be present. Consideration should be given to prompt use of other suitable non-benzimidazole fungicides. Use of eFOG-100 TBZ should be integrated into an overall disease management program within each packinghouse.

### **Resistance-Management Recommendations**

For resistance management, eFOG-100 TBZ contains a Group 1 fungicide. Any fungal population may contain individuals naturally resistant to eFOG-100 TBZ and other Group 1 fungicides. A gradual or total loss of pest control may occur over time if these fungicides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

To delay fungicide resistance, take one or more of the following steps:

- Rotate the use of eFOG-100 TBZ or other Group 1 fungicides with different groups that control the same pathogen
- Use tank mixtures with fungicides from a different group that are equally effective on the target pest when such uses are permitted. Use at least the minimum application rate as labeled by the manufacturer.
- Monitor treated fungal populations for resistance development.
- Contact your local extension specialist or certified crop advisor for any additional pesticide resistance-management and/or IPM recommendations for specific crops and pathogens.
- For further information or to report suspected resistance contact Pace International LLC at 1-800-936-6750. You can also contact your pesticide distributor or university extension specialist to report resistance.

### Application Restrictions

Only one application of eFOG-100 TBZ may be applied postharvest on any variety of pome fruits (i.e., apple, crabapple, loquat, mayhaw, pear, oriental pear, or quince) by electrofog machine. Do not apply to fruit that has been previously treated with thiabendazole via drench or dip/wash application. Apply only with electrofog machine.

### Preparation for Fogging

- Fruit must be completely dry before treatment.
- Apply to fruit as close to harvest as possible and no more than 7 days after harvesting.
- Before treatment, protect fruit directly in front of the fogging equipment with liners or sheets 4 bins high in front of the door plus 2 bin stacks wide on either side of the door.
- For best results, place 4-inch perforated tubing along the back wall of the storage room. Connect and run non-perforated tubing along the side of the room up to the man door for venting outside the room. If installation of perforated tubing along the back wall is not feasible, a vent tube should be placed on the floor of the room for venting to the outside.
- When treating rooms that are less than 75% full, calculate the dosage of eFOG-100 TBZ by adding a tonnage value of 20% of the empty volume to the real tonnage of the fruit.

### Application Rate

Apply 40 milliliters of eFOG-100 TBZ per metric ton (2200 lb.) of fruit (or 1.225 fluid ounces per US ton).

### 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 man door cover or plastic sheet and insert the fogging pipe through the nozzle opening or a hole in the plastic. Place a bucket under the nozzle to catch any drops. Seal the opening around the nozzle with an elastic sleeve or duct tape so no fog can escape during treatment.
- Turn on Exit Temperature Toggle Switch and set Exit Temperature to 180°C.
- Insert input pipe into product container and start pump.
- Wait for Exit Temperature to stabilize and monitor the temperature during operation.

### Application Procedures

- Do not breathe fog.
- Turn off room cooling systems and humidifiers at least 2 hours prior to and during treatment.
- Defrost coils immediately after refrigeration is shut off.
- 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 fruit after treatment.

### 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.

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Store in a cool, dry location not below 40°F or above 79°F. Do not use or store near heat or open flames. 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:**

*[for packages ≤ 5 gallons]*

Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. 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 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, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

*[for packages > 5 gallons]*

Non-refillable 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 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, 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. 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 must 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 the 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.

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