



PM 01 65726-3 10/7/97 19174
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

001 7 1997

Dr. Edgar R. Butts
E.R. Butts International, Inc.
26 Sherman Court
P.O. Box 764
Fairfield, Connecticut 06430

Subject: Pin Nip™ 98.6% Chlorpropham
EPA Registration Number 65726-3
Your amended labeling dated September 9, 1997

Dear Dr. Butts,

We have reviewed the subject amended labeling, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended. The amended labeling is acceptable, provided that you:

1. Make the changes listed below before you release the product for shipment bearing the amended labeling:

- a. In the "STORAGE" subsection, move the sentence

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

Up, so that it directly follows the title "STORAGE AND DISPOSAL" and precedes the subtitle "STORAGE". This statement refers to both storage and disposal; the position requirement is referred to in our Label Review Manual.

- b. In the "STORAGE" subsection, remove the sentence

"This product inhibits germination of seed potatoes."

This statement has nothing to do with storage and is better placed in the "DIRECTIONS FOR USE" section.

2. Submit one copy of your final printed labeling, bearing the required changes, before you release the product for shipment.

The Agency also recommends that if freezing would adversely affect this product, and/or if heating it above a certain temperature could potentially lead to fire or other problems, you add language to the storage section that is appropriate for these eventualities.

Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions. If you have any questions about this letter, please contact John Bazuin at (703)305-7381.

Sincerely yours,

CS

Cynthia L. Giles-Parker
Team Leader (22)
Fungicide Branch (7505C)
Registration Division

Attachment: Labeling stamped "Accepted with Comments"

3 7 4

PIN NIP™ 98.6% CHLORPROPHAM

AEROSOL GRADE - POTATO SPROUT INHIBITOR

	By Weight
Active Ingredient: Chlorpropham* (Isopropyl N-(3-chlorophenyl) carbamate)	98.6%
Inert Ingredients	1.4%
Total	100.0%

**ACCEPTED
with COMMENTS**
In EPA Letter Dated
OCT 7 1997

*Contains 9.709 pounds of active ingredient per gallon.

*Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
65726-3*

CAUTION

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing vapors or dust. Avoid contact with skin, eyes, and clothing. In case of contact immediately flush with plenty of water. Get Medical attention if symptoms persist.

Statement of Practical Treatment

- IN CASE OF CONTACT:** Flush eyes and skin with plenty of water for several minutes . Get Medical attention if eye or skin irritation occurs.
- IF SWALLOWED:** Immediately give several glasses of water and induce vomiting by gagging the victim with a finger placed on the back of the victim's tongue. Give fluids until vomitus is clear. If victim is unconscious, do not induce vomiting or give anything by mouth.
- IF INHALED:** Remove to fresh air. Seek medical attention if respiratory irritation occurs or if breathing becomes difficult.

EMERGENCY INFORMATION

In case of spill, leak fire, exposure, or accident call CHEMTREC 1-800-424-9300.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by disposal of equipment washwaters.

STORAGE AND DISPOSAL

STORAGE

Keep container closed. Do not contaminate water, food, or feed by storage or disposal. This product inhibits germination of seed potatoes.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Do not reuse as a container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

PIN NIP, Inc.
P.O. Box 860
Meridian, ID 83680-0860

NET CONTENTS 5 X 8 Pounds

EPA Reg. Number 65726-3
EPA Est. Number 065726-ID-002
Made in Finland
Revision A-2

DIRECTIONS FOR USE

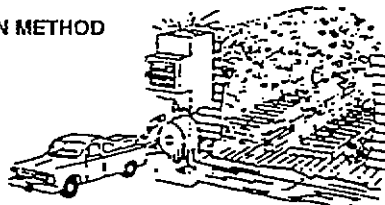
IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING

NOTICE

- PIN NIP™ is used as an aerosol for treating potatoes for sprout inhibition during storage.
- If entry into the storage area is necessary during or immediately following application before the fog has settled, protective clothing and respirators must be worn.
- Do not apply in the field.
- Do not use on seed potatoes. This inhibition of sprouting at recommended rates is usually effective up to a year regardless of removal from storage.
- Do not allow vapors to come in contact with, or get near to, storage areas used for seed potatoes.
- Let six months elapse before using treated storage area for seed potatoes. Air system components (including ducts) and building must be thoroughly cleaned before area is used for storage of seed potatoes.
- PIN NIP™ will prevent periderm formation of potatoes, therefore, it should be used only after bruises and cuts have healed (normally minimum of two weeks).

FORCED AIR DISTRIBUTION METHOD

1. Assemble unit as shown. Insert aerosol generator intake hose in PIN NIP™ container.
2. Set air ducts for recirculation.
3. Place exhaust end of aerosol generator at center of plenum (air mixing chamber) pointing it in direction of air flow. This will assure the best possible distribution of PIN NIP™ throughout the duct system.



TREATMENT OF STORAGE OR OTHER AREAS THAT DO NOT HAVE RECIRCULATING AIR SYSTEMS

Prior to placing the potatoes in the area to be treated, make the following preparations:

1. On the floor of the area, install an air duct approximately 12 inches by 12 inches running the length or width of the potato pile leaving a false wall space at both ends for air circulation. The ducts should be spaced 10 to 12 feet apart and can be perforated metal pipe, slotted wood construction or if the potatoes are in bags, by bridging a 12 inch space between two rows of bags in the bottom layer with bags placed crosswise the space.
2. At the end of each duct in the false wall space where the fog is to be introduced, place a squirrel cage fan positioned to force air through the duct. The exit end of the duct must be blocked to force the air up through the piled potatoes.

When the area is filled and ready to treat, the following steps should be taken:

1. Close off any ventilating systems.
2. Start the squirrel cage fans.
3. Introduce the fog as near as possible to the bottom of the false wall space containing the fans.
4. Operate the fans until the fog has settled.
5. Reactivate the ventilation systems 4 hours following application or when the fog has settled.

NOTE: When treating small areas such as trailer trucks or railroad cars, it is recommended that low volume aerosol generators such as "Swing Fog" be used.

APPLICATION

Application of PIN NIP™ can be made anytime after the curing period and before sprouting of potatoes occurs.

1. Apply at rate of 1 pound active ingredient per 1,000 bushels (600 cwt.). One gallon treats 10,000 bushels (6,000 cwt.). Treat according to volume of storage (see table below for conversion).
2. For low volume application, use FORCED AIR recirculation through the pile at rates up to 5.0 CFM per ton of potatoes. For other applications, use the lowest FORCED AIR recirculation available for the applicator. Check for uniform air distribution throughout the potato pile.
3. Keep storage closed during application. Continue to recirculate air in storage for at least 4 hours or until the fog has settled. Return storage to normal ventilation as soon as possible following application.

1 cwt. = 1.67 bushels = 2.5 cubic feet; 1 bushel = 60 pounds = 1.5 cubic feet

RECOMMENDED CHLORPROPHAM RATE

To calculate the rate needed use the following formula:

$$\% \text{ of Standard Application Rate} = (2 \times T) + [(5 \times M) - 5]$$

Where:

Standard Application Rate = 1 pound active ingredient/600 cwt.

T = Storage Temperature

M = Number of Months Storage Time

Example Calculation: (Potatoes stored at 45°F for six (6) months)

$$\text{Required Rate} = (2 \times 45) + [(5 \times 6) - 5] = 115\%$$

TIME MONTHS	STORAGE TEMPERATURE				
	40° F	45° F	50° F	55° F/1	60° F/1
1	80%	90%	100%	110%	120%
2	85%	95%	105%	115%	125%
3	90%	100%	110%	120%	130%
4	95%	105%	115%	125%	135%
5	100%	110%	120%	130%	140%
6	105%	115%	125%	135%	145%
7	110%	120%	130%	140%	150%
8	115%	125%	135%	145%	155%
9	120%	130%	140%	150%	160%
10	125%	135%	145%	155%	165%

/1 - Rates for 55°F and 60°F are for processing potatoes only.

Chart assumes treatment soon after suberization time.

EXTENDED STORAGE

If the potatoes are held in storage longer than originally anticipated, the potatoes may be retreated. Using the above chart, the retreatment dosage is equal to the total amount required for the extended storage time less the amount used for the original storage time.

For example, potatoes stored at 45°F were treated based on a two (2) month storage period. A decision was made to extend storage to five (5) months (three months in addition to original 2 months). The total extended storage would require a total of 110% of the standard rate; the original treatment would have used 95% of the standard rate. In this case, retreatment would require 15% (110%-95%) of the standard treatment.

CONDITIONS OF SALE

Pin Nip, Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to manufacturer, and buyer assumes the risk for any such use.