

65726-3

1/30/2013

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms Amy Plato Roberts
PIN NIP, A Division of 1, 4 Group Inc.
c/o Technology Sciences Group, Inc
712 Fifth St., Suite A
Davis, CA 95616

JAN 30 2013

Subject: Notification per PRN 98-10: Update Warranty Statement and other changes
Submission date: 1/4/2013
Product Name: PIN NIP 98% Chlorpropham
EPA Reg. No. 65726-3
Decision Number 474104

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 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 questions concerning this letter, please contact Banza Djapao at 703-305-7269, or via e-mail at djapao.banza@epa.gov, or myself at 703-308-9443.

Sincerely,

A handwritten signature in black ink that reads "Banza Djapao for".

Tony Kish
Product Manager, Team 22
Fungicide Branch
Registration Division (7504P)

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide – Section I

1. Company/Product Number 65726-3	2. EPA Product Manager Tony Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PIN NIP 98% Chlorpropham	PM# 22	
5. Name And Address Of Applicant (Include ZIP Code) PIN NIP, A Division of 1,4Group Inc. P.O. Box 860 Meridian, ID 83680-0860 <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. _____ Product Name _____	

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.)
 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.

Please confirm receipt with Leslie Garcia: Lgarcia@TSGUSA.com, or via phone (530) 757-1211, or via fax (530) 757-1299.

Section III

1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Unit Packaging wgt. No. per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container <p style="text-align: center;">50 lb</p>	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product			
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Amy Plato Roberts, Technology Sciences Group, Inc.	Title Regulatory Consultant	Telephone No. (Include Area Code) (530) 757-1432
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 or both under applicable law.		6. Date Application Received <p style="text-align: center;">(Stamped)</p>
2. Signature 	3. Title Regulatory Consultant	
4. Typed Name <p style="text-align: center;">Amy Plato Roberts</p>	5. Date <p style="text-align: center;">January 4, 2013</p>	

3/1/10/17



Technology Sciences Group Inc.

712 Fifth St., Suite A
Davis, CA 95616
Direct in CA: (530) 757-1432
Direct in DC: (202) 828-8964
Fax: (530) 757-1299
E-Mail: aroberts@tsgusa.com

Amy Plato Roberts
Senior Regulatory Consultant

January 4, 2013

Tony Kish, PM 22
Fungicides Branch
Registration Division (7505P)
Office of Pesticide Programs, EPA
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

**RE: PIN NIP® 98% Chlorpropham
EPA Reg. No. 65726-3
Label Notification**

Dear Mr. Kish:

Enclosed with this letter you will find the following in support of a notification to update the EPA master label for the above referenced product:

- 1) Notification form;
- 2) One (1) copy of the label with all changes highlighted in redline;
- 3. ~~Five~~ (5) copies of the proposed label (clean).

The following revisions have been made which are allowable under PRN 98-10:

- Clarify company zip code ✓
- Addition of optional EPA Establishment Site Number ✓
- Optional internal revision label code ✓
- Clarify full product name and approved max rate ✓
- Optional conversion chart and referral statement ✓
- Revise warranty statement ✓

No other changes have been made at this time. If you have any questions or comments, please do not hesitate to contact me directly.

Regards,

Amy Plato Roberts
Regulatory Consultant for D-I-1-4, Inc. a division of 1,4Group, Inc.

Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 247-6285

PIN NIP® 98% CHLORPROPHAM
AEROSOL GRADE - POTATO SPROUT INHIBITOR

JAN 30 2013

Active Ingredient: Chlorpropham* (Isopropyl N-(3-chlorophenyl) carbamate).....	By Weight	98.0%
Inert Ingredients		2.0%
Total		100.0%

* Contains 9.709 pounds of active ingredient per gallon.

KEEP OUT OF REACH OF CHILDREN
CAUTION
PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
Harmful if swallowed or absorbed through skin or inhaled.
Avoid contact with eyes, skin and clothing. Avoid breathing aerosol.

First Aid

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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 swallowed	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
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 by mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear chemical resistant gloves such as or made of any waterproof material.

From the start of application and continuing until the ventilation requirements listed on this labeling have been completed, for entry into the enclosed treated area, handlers must also wear long-sleeve shirt, long pants, shoes and socks and a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TX-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.

If the enclosed area contains less than 19.5 percent oxygen, the respirator worn by handlers must be one of the following types:

- A supplied-air respirator (MSHA/NIOSH approval number prefix TC-21C) OR a self-contained breathing apparatus (SCBA) (MSHA/NIOSH approval number prefix TX-13F).

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.

Emergency Information

For spill, leak, fire, exposure, or accident, call PERS 1-800-633-8253.

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.

NET CONTENTS 5 X 10 lbs

Pin/Nip, a division of 1,4GROUP, Inc.
P.O. Box 860
Meridian, ID 83680-0860

EPA Reg. Number 65726-3

EPA Est. Number 65726-ID-303 /

65726-ELS-001

Made in Finland
[Revisions 010412]

DIRECTIONS FOR USE

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

Notice

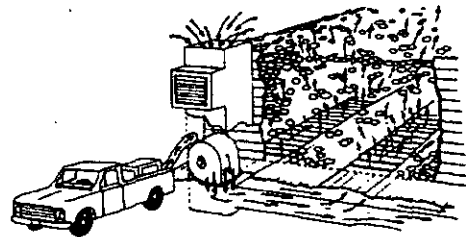
- PIN NIP® 98% Chlorpropham is used as an aerosol for treating potatoes for sprout inhibition during storage.
- Do not apply in the field.
- This product inhibits germination of seed potatoes. Do not use on seed potatoes.
- Do not allow aerosol to come in contact with, or get near to, storage areas used 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.
- The inhibition of sprouting at recommended rates is usually effective regardless of removal from storage.
- PIN NIP® 98% Chlorpropham will prevent periderm formation of potatoes, therefore, it should be used only after bruises and cuts have healed (normally minimum of two weeks).

Entry Restrictions

Do not enter or allow any person, other than a person equipped with the appropriate handler personal protective equipment including the appropriate respirator, to enter the treated area until the area has been ventilated. Ventilation may be for either a total of two (2) hours with fans or other mechanical ventilation or four (4) hours with windows, vents, or other passive ventilation, or until such time that there have been 10 complete air exchanges. The ventilation time may be interrupted, i.e., the time may be accumulated at sporadic intervals, such as 15 minutes of ventilation followed by a period with no ventilation, until the total required ventilation time has accumulated.

Forced Air Distribution Method

1. Assemble unit as shown. Insert aerosol generator intake hose in PIN NIP® 98% Chlorpropham 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® 98% Chlorpropham throughout the duct system.



Treatment of Storages 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.

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

Application

Application of PIN NIP® 98% Chlorpropham should be made anytime after the curing period and before sprouting of potatoes occurs.

1. Apply at rates from 1 to 2 pounds active ingredient per 1,000 bushels [600 hundred weight (CWT)]. Treat according to volume of storage [Optional: see table below for conversion].
2. Use the lowest FORCED AIR recirculation through the pile. Check for uniform air distribution throughout the storage and adjust the airflow if necessary.
3. Keep storage closed during application. After application, initiate ventilation as described in the Entry Restriction.

[Optional conversion chart: 1 cwt. = 1.67 bushel = 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 (60,000 lbs).

T = Storage Temperature

M = Number of Months Storage Time

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

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

Application Rate

When treating long-term storage potatoes, the Standard Application Rate (1 lb) can be raised to 2 pounds active ingredient/600 CWT (60,000 lbs).

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.

Re-Treatment For Extended Storage

If the potatoes are held in storage longer than originally anticipated, the potatoes may be re-treated as necessary. However, using either the above chart or the rate formula, the re-treatment application must be no greater than the total amount required for the extended storage time *minus* the amount already applied.

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 (3 months in addition to the 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, re-treatment would require 15% (110%-95%) of the standard treatment.

The maximum application for *either* a single treatment *or* the total amount of chlorpropham applied via aerosol fog to potatoes destined for the fresh market is 145% of the label's 2 pounds application rate.

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The maximum application for *either* a single treatment or the total amount of chlorpropham applied via aerosol fog to potatoes destined for processing is 165% of the label's 2 pounds application rate.

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.

Storage and Disposal

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

Pesticide Storage

Keep container closed. Keep in a cool dry place.

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

Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Conditions of Sale

1,4GROUP, 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. To the extent consistent with applicable law, 1,4GROUP, Inc. makes no other warranties, express or implied, including the implied warranty of merchantability or the implied warranty of fitness for a particular purpose, that extend beyond the statements made on this label. To the extent consistent with applicable law, 1,4GROUP, Inc., disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall not exceed the purchase price paid or at 1,4GROUP, Inc.'s election, replacement of the product.

NOTICE – This solid CIPC product is manufactured for use in processes claimed in U.S. Patents 5,935,660 and 6,068,880. Contact 1,4GROUP in Meridian, Idaho for further information regarding the product or patents.

(Lot No./Batch No.: _____)

NOTIFICATION

JAN 30 2013

