

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 12 2007

Ms. Terri Siemer-Aal
Regulatory Consultant
Associated, Siemer & Associates, Inc.
KIM-C1, LLC
135 W. Shaw Avenue, #102
Fresno, CA 93704

RE: Notification of Change to Revise Wording Regarding 2-4 Hour Rainfast Statement
EPA Registration Number: 71049-1
Date of Submission: March 14, 2007

Dear Ms. Siemer-Aal:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated March 14, 2007, for the product KT-30 Plant Growth Regulator. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions 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 Joyce Edwards of my staff at 703-308-5479.

Sincerely,

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

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

Application for Pesticide - Section I

1. Company/Product Number KIM-C1, LLC/71049-1	2. EPA Product Manager Tony Kish	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) KIM-C1, LLC/KT-30 Plant Growth Regulator	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) KIM-C1, LLC 135 W. Shaw Avenue, #102 Fresno, CA 93704 <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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
--	---

NOTIFICATION
APR 12 2007

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to revise wording regarding 2-4 hours rain-fast statement - change requested by Cal-EPA. 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 CSF.

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"/> Text <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" 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 <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 0.018 lbs.	5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <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 Terri Siemer-Aal	Title Regulatory Consultant/KIM-C1, LLC	Telephone No. (Include Area Code) 559-637-4576
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 (Stamped)
2. Signature 	3. Title Regulatory Consultant/KIM-C1, LLC	
4. Typed Name Terri Siemer-Aal	5. Date 3-14-2007	

NOTIFICATION^{3/14}

APR 12 2007

KT-30™
Plant Growth Regulator

ACTIVE INGREDIENT	BY WEIGHT
CPPU (<i>N</i> -(2-chloro-4-pyridinyl)- <i>N'</i> -phenyl urea).....	98.00%
OTHER INGREDIENTS.....	2.00%
TOTAL.....	100.00%

This package contains 8 grams active ingredient.

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID	
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 a 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 mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
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.
NOTES:	<ul style="list-style-type: none">• Have the product container or label with you when calling a poison control center or doctor, or going for treatment.• In the event of a medical emergency, you may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378.

EPA REG. NO. 71049-1

EPA EST. NO. 33762-IA-001

MANUFACTURED for:
KIM-C1, LLC
135 W. Shaw Avenue, #102
Fresno, CA 93704

NET CONTENTS: 0.018 lbs. (8 grams active ingredient)

PRECAUTIONARY STATEMENT
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION – Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe vapors or spray mist.

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 C on an EPA chemical resistance category selection chart.

APPLICATORS AND OTHER HANDLERS MUST WEAR: coveralls over long-sleeved shirt and long pants, chemical-resistant gloves such as barrier laminate or viton, chemical-resistant footwear, plus socks, protective eyewear, and chemical-resistant headwear.

Follow manufacturer's instructions for cleaning/maintaining 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.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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 HAZARS

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

STORAGE AND DISPOSAL:

PESTICIDE STORAGE: Do not contaminate water, food, or feed by storage or disposal. Keep pesticide in original container. Keep under cool conditions.

PROHIBITIONS: Open dumping is prohibited.

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: Dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is”

- coveralls over long-sleeved shirt and long pants;
- chemical-resistant gloves such as barrier laminate or viton;
- chemical-resistant footwear, plus socks; protective eyewear;
- chemical-resistant headwear.

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

GENERAL DIRECTION FOR USE

IMPORTANT: Before application, read all use directions thoroughly. Use KT-30 only as directed.

This KT-30 package contains 8 grams of N-(2-chloro-4-pyridinyl)-N'-phenylurea, or CPPU.

KT-30 is an extremely potent plant growth regulator (PGR) that has been shown to improve the fruit size and fruit set of grapes and kiwi. However, excessive rates of KT-30 can result in undesirable results. For specific effects and benefits, see the Spray Guidelines by Crop section.

- Product efficacy requires thorough coverage of the fruit. Uniform spray coverage is essential to achieve the desired results.
- For best results, apply KT-30 under slow drying conditions, e.g. early in the morning, late in the afternoon, or at night, in order to ensure adequate uptake.
- For best results, the water pH should be close to neutral, and always below 8.5.
- DO NOT apply KT-30 to plants under stress. If plants under stress are treated, the effect may be reduced.
- DO NOT use overhead irrigation until sprays of KT-30 have dried completely.
- DO NOT apply KT-30 if rain is expected before sprays have dried completely.
- DO NOT apply this product through any type of irrigation system.
- Aerial application of KT-30 is prohibited.
- Use of adjuvants: Adjuvants, if used, should be of a non-ionic nature, such as Latron B1956®, and should not exceed 0.1% (v/v).

- **Compatibility:** Tank mixes of KT-30 with materials other than ProGibb®, Promalin®, and Accel®, or a suitable non-ionic surfactant are not recommended.
- **Spray Method Restrictions:** Use only dilute sprays. DO NOT apply by ULV or concentrate methods. Use drop nozzles directed onto fruit from beneath the canopy on row and airblast sprayers. In order to minimize spray drift, it is recommended that whenever possible average spray particle size be 200µ or larger.
- **DO NOT** treat fruit by dipping. Use of the dip method for applying KT-30 may result in residues exceeding tolerance restrictions.

Consult your local KIM-C1 agricultural representative for specific information on the best use recommendations for your particular crop.

DISSOLVING INSTRUCTIONS

To properly dissolve KT-30 Plant Growth Regulator, the following instructions must be followed very closely. Failure in following the instructions will result in incomplete dissolution of the active ingredient and poor field product performance.

There is one bottle of solvent for every bottle of KT-30 PGR powder. You will need the whole quart of solvent to dissolve the 8 grams of KT-30 PGR. Use one bottle of KT-30 PGR and one bottle of solvent at a time in the procedure below.

OPTION 1. “PREFERRED OPTION” (To be done one or more days before spraying)

Using a funnel, pour the whole quart of solvent from one bottle into one bottle containing the 8 grams of KT-30 PGR, close the cap tightly and shake the container vigorously for 3-4 minutes. Let the container stand overnight. The next day, observe the bottom of container to assure there are no particles left undissolved. For the process to be complete, you should not see any particles. If you see any particles, continue shaking the container until all particles have disappeared. At this point you can proceed to use the product.

NOTE: Once dissolved, KT-30 PGR is very stable if kept closed tight under standard pesticide storage conditions. Therefore, you may elect to dissolve all the KT-30 PGR material that you intend to use during the season, well ahead of time. This will completely ensure total dissolution of the powder and avoid having to shake the bottles for a long time just prior to spraying.

OPTION 2. (To be done the day of spraying)

Using the funnel, pour the whole quart of solvent from one bottle into one bottle containing the 8 grams of KT-30 PGR, close the cap tightly and shake the container

vigorously for at least 20 minutes. Observe the bottom of container to assure there are no particles. If you see any particles, continue shaking the container until all particles have disappeared. At this point you can proceed to use the product.

DO NOT:

- Mix the powder from different bottles into one
- Pour the powder into the bottle containing the solvent

SPRAY TANK MIXING INSTRUCTIONS

Fill the sprayer half way and add the desired amount of the KT-30 PGR solution (prepared per instructions above). With continuous agitation, add the rest of the water and the surfactant if you are using one.

SPRAY GUIDELINES BY CROP

Grapes

Seedless Grape

An application of KT-30 has been shown to increase berry size. Increased berry size improves cluster weight, total yield and pack out. KT-30 may improve fruit quality in cold storage. KT-30 treatment may delay grape maturation, i.e. slow Brix accumulation. Color development may be delayed in colored varieties. These factors may cause a delay in harvest. The higher the rate of product applied, the greater the potential for maturity delay.

Rates

Thorough coverage of the clusters is critical to achieve the desired response. In general, the higher the concentration, the greater response for berry size and maturity (harvest) delay. A lower rate range of from 3 to 6 grams a.i. per acre can provide a berry size increase with minimal harvest delay. The higher rate range of 8 to 10 grams a.i. per acre will maximize berry size and maximize harvest delay (see Table 1). Field trials have shown that harvest delay following KT-30 applications do not always occur, and may be dependant upon weather conditions as well as the rates of product used. DO NOT exceed the maximum rate of 10 grams a.i. per acre of KT-30 and do not apply this amount of product in less than 200 gallons per acre. DO NOT make more than one application per season.

Table 1 – Application Rate Calculations

PPM	KT-30	
	Grams a.i./A	Gallons per Acre
6	4	200
6	6	250
6	8	350
6	10	400
8	6	200
8	8	250
8	10	350
10	8	200
10	10	250

Timing

Make a single application per season based on average berry diameter. The timing will vary by variety (See Table 2). Make sure that the latest developing marketable clusters have completed shatter and final berry set by the time the application is made. Applications to flowering clusters will cause excessive fruit set and may overcome ProGibb berry thinning effects. To maximize berry size use the highest rate of KT-30 in combination with ProGibb (See the ProGibb label for rates). Field testing has shown that KT-30 and ProGibb tank mixes applied at the time of the second ProGibb “sizing” spray will result in optimum berry sizing for common varieties such as “Thompson Seedless”. However, a combined spray application of KT-30 and Pro-Gibb may delay maturity more than either product alone, particularly when highest label rates of ProGibb are used.

Spray Volume

Use a volume of water between 200 and 500 gallons per acre (GPA), but do not spray past runoff. Spray volumes lower than 200 GPA may result in poor coverage and reduce the effectiveness of the application.

Tank Mixing

KT-30 can be applied alone, or it may also be tank mixed with ProGibb “sizing” sprays. KT-30 may also be applied in combination with a non-ionic surfactant. Other tank mix combinations with KT-30 are not recommended.

Seeded Grape for Fresh Market

An application of KT-30 has been shown to increase berry size. Increased berry size improves cluster weight, total yield and pack out. KT-30 may improve fruit quality in cold storage. KT-30 treatment may delay grape maturation, i.e. slow Brix accumulation. Color development may be delayed in colored varieties. These factors may cause a delay in harvest. The higher the rate of product applied, the greater the potential for maturity delay.

Rates

For recommended rates, see Table 1. Thorough coverage of the clusters is critical to achieve the desired response. In general the higher the concentration the greater response for berry size and delayed maturity. DO NOT exceed the maximum rate of 10 grams a.i. per acre and do not apply this amount of product in less than 200 gallons per acre. DO NOT make more than one application per season.

Timing

Make a single application per season based on average berry diameter. The timing will vary by variety (See Table 2). Applications to flowering clusters will cause excessive fruit set.

Spray Volume

Use a volume of water between 200 and 500 gallons per acre (GPA), but do not spray past runoff. Spray volumes lower than 200 GPA may result in poor coverage and reduce the effectiveness of the KT-30.

Tank Mixing

Tank mixes of KT-30 with any materials except a suitable non-ionic surfactant (see Use of Adjuvant section) are not recommended.

Table 2 – Suggested Berry Diameters for Timing KT-30 Sprays for Fresh Market Grapes

Variety ¹	Avg. Berry Diameter (mm)
Thompson Seedless	6 - 10
Flame Seedless	8 - 14
Perlette	6 - 8
Ruby Seedless	9 - 12
Red Globe	14 - 20
Emperor	12 - 14

¹ All varieties have not been fully tested. This includes other seedless varieties, such as Crimson, Fantasy, and Black Beauty. It would be best to treat when berry diameter is between 10-14 mm. It is suggested that additional seeded varieties be treated when berry diameter is between 12-16 mm.

Seeded Grape for Wine

One application of KT-30 has been shown to increase berry set, or berry size. KT-30 treatment may delay grape maturity and color development. These factors may cause a delay in harvest. The higher the rate of product applied, the greater the potential for maturity delay.

Rates

Make a single application of KT-30 using 2 to 10 grams a.i. per acre, making sure that clusters are thoroughly covered with spray (see Table 1). DO NOT exceed the maximum rate of 10 grams a.i. per acre.

Timing

Make a single application per season. To increase berry set, apply KT-30 during bloom. To increase berry size, apply KT-30 14 to 21 days after the completion of berry shatter. The timing may vary by variety. All varieties have not been fully tested.

Spray Volume

Use a volume of 200 gallons per acre (GPA). Spray volumes lower than 200 GPA may result in poor coverage and reduce the effectiveness of the application.

Tank Mixing

Tank mixes of KT-30 with any materials except a suitable non-ionic surfactant (see Use of Adjuvant section) are not recommended.

Grapes for Raisins

An application of KT-30 following the label directions increases fruit set and/or berry size, and may decreased drying ratio. KT-30 application may delay maturity, which may cause a delay in harvest. The higher the rate of product applied, the greater the potential for delayed maturity.

Rates

Make a single application of KT-30 using 2 to 10 grams a.i. per acre, making sure that clusters are thoroughly covered. In general, use lower rates to increase berry set (2 to 3 grams a.i. per 100 GPA). Use higher rates (6 to 10 grams a.i.) to increase berry size. The higher the rate, the greater the response of berry size and maturity delay. DO NOT exceed the maximum rate of 10 grams a.i. per acre. DO NOT make more than one application per season.

Timing

To increase berry set, make a single application at bloom. To increase berry size, make a single application when the berry diameter averages 8 to 10 mm.

Spray Volume

Use a volume of 200 gallons per acre (GPA). Spray volumes lower than 200 GPA may result in poor coverage and reduce the effectiveness of the application.

Tank Mixing

Tank mixes of KT-30 with any materials except a suitable non-ionic surfactant (see Use of Adjuvant section) are not recommended.

Additional Varieties for Raisins

Most seedless raisin varieties will respond when treated using the rates and timings described above. Use lower rates to minimize size enhancement and maturity delay.

Kiwifruit

An application of KT-30 following the label directions will result in increased fruit size.

Rates

For intermediate fruit size enhancement use lower rates and use higher rates to maximize fruit size. Use 2 to 8 grams a.i. per acre. See Table 1. Make sure that fruit are thoroughly covered. DO NOT exceed the maximum rate of 8 grams a.i. per acre. DO NOT make more than one application per season.

Timing

Make the single application when the berry length averages 30-45 millimeters. Fruit will generally be in this range at 2-3 weeks following bloom.

Spray Volume

Use a volume of 200 gallons per acre (GPA). Spray volumes lower than 200 GPA may result in poor coverage and reduce the effectiveness of the application.

Tank Mixing

Tank mixes of KT-30 with any materials except a suitable non-ionic surfactant (see Use of Adjuvant section) are not recommended.

Warranty/Liability

To the extent allowable under State law, seller makes no warranty, express or implied, of merchantability, fitness or otherwise concerning the use of this product other than as indicated on the label. User assumes all risks of use, storage or handling not in strict accordance with accompany directions.

Latron B1956 is a trademark of Rohm and Haas
ProGibb, Promalin, and Accel are all trademarks of Valent BioSciences Corp.

March 14, 2007

1612 11th Street
Reedley, CA 93654
Telephone (559) 637-4576
FAX (559) 637-4578
Aalterri@aol.com

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Subject: KIM-C1, LLC
KT-30 Plant Growth Regulator, EPA Reg. No. 71049-1
Notification of change – revised wording regarding 2-4 hour rain-
fast statement – change requested by Cal-EPA

Dear Sir or Madam:

On behalf of KIM-C1, LLC we are submitting a notification of change for two sentences on the label. The following two sentences that are being revised currently read, "DO NOT use overhead irrigation for at least 2-4 hours (after the sprays have dried) following the KT-30 application." and "DO NOT use KT-30 if rain is expected within 2-4 hours after the spray has dried." The aforementioned sentences have been revised to read, "DO NOT use overhead irrigation until sprays of KT-30 have dried completely." and "DO NOT apply KT-30 if rain is expected before sprays have completely dried." These label revisions are consistent with the guidelines of PR-Notice 98-10.

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.

If you have any questions regarding this notification, please contact me.

Thank you.

Sincerely,



Terri Siemer-Aal
Regulatory Consultant
Associate, Siemer & Associates, Inc.