

71297-2

03/05/2008

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

MAR 05 2008

Technology Science Group Inc.
c/o Amy Plato Roberts
1150 18th St, NW.
Washington, DC 20036

Subject: Product Name: Smart Fresh
EPA Reg. No: 71297-2
Application for label Notification dated February 6, 2008 to update first aid statement and additional room/pouch combination within the range of the current table.

Dear Ms. Beaulieu:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PRN 98-10 and it has been determined that the action(s) requested falls within the scope of PRN 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification, received and reviewed" and will be placed accordingly in our records.

Questions concerning this action should be directed to Mr. Raderrio Wilkins at (703) 308-1259 or email at wilkins.raderrio@epa.gov.

Sincerely,

Linda Hollis

Linda Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division



United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration	OPP Identifier Number
<input type="checkbox"/>	Amendment	
<input checked="" type="checkbox"/>	Other	

Application for Pesticide - Section I

1. Company/Product Number AgroFresh, Inc. / 71297-2	2. EPA Product Manager Driss Benmhend	3. Proposed Classification None X Restricted
4. Company/Product (Name) SmartFresh™	PM#	
5. Name and Address of Applicant (Include Zip Code) AgroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399	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

Amendment - Explain below. Final printed labels in response to Agency letter dated _____
 "Me Too" Application.

X Notification - Explain below. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
 This notification is to add additional room/pouch combinations within the currently approved treatment rate and modify the First Aid Statement in compliance with PR Notice 2001-1.

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 18U.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.

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container 0.009 oz to 8.6 oz	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container 0.009 oz to 8.6 oz	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)
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* Certification must be submitted

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container Foil package containing WSP	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 type="checkbox"/> Lithograph <input checked="" 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 Ann Beaulieu	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 215-619-5534
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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.

2. Signature 	Director, Regulatory Affairs	6. Date Application Received (Stamped)
4. Typed Name Ann Beaulieu	5. Date February 5, 2008	

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February 6, 2008

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Re: SmartFresh™
EPA Registration Number 71297-2
Active Ingredient = 1-methylcyclopropene
Notification of pouch/room change and updated first aid statement

Enclosed is a notification to amend the label of SmartFresh™ by adding additional room/pouch combinations within the range of the current table. The change narrows the range of the treated rooms and thereby improves the accuracy of the treatment. The dose applied remains within the approved label rate. This change is permitted by notification according to PR Notice 98-10 II.E.

The First Aid statement has been updated and reformatted to meet PR Notice 2001-1. This change is permitted by notification according to PR Notice 98-10.

I have enclosed a draft copy of the proposed amended label. The proposed changes to the current EPA approved label are shown in red. I have also enclosed a second copy of the proposed label without the changes highlighted in red.

The amendment is being made by notification and is consistent with the notifications allowed under PR Notice 98-10.

For questions, please contact me at 215-619-5534 or abeaulieu@agrofresh.com. Thank you.

Sincerely,



Ann Beaulieu
Director, Regulatory Affairs

enclosures



Inc.

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SUBLABEL – COMMERCIAL LABEL FOR THE TREATMENT OF APPLES, MELONS, TOMATOES, PEARS, AVOCADOES, MANGOES, PAPAYAS, KIWIFRUIT, PEACHES, NECTARINES, PLUMS, APRICOTS, AND PERSIMMONS

SmartFresh™	AgroFresh Inc A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
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Active Ingredient: 1-Methylcyclopropene 3.3%
 Other Ingredients: 96.7%
 Total: 100.0%

EPA REGISTRATION NO. 71297-2
EPA EST. NO. 707-WA-001

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product in its generating system unopened and unused within thirty days of purchase to the place of purchase.

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID	
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.
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 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 swallowed	<ul style="list-style-type: none"> • Call 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 215-592-3000 for emergency medical treatment information.</p>	

Net Contents: SmartFresh™ Water Soluble Pouch Sizes

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0.009 oz	(0.25 grams)	0.32 oz	(9.1 grams)	3.2 oz	(89.3 grams)
0.012 oz	(0.35 grams)	0.45 oz	(12.9 grams)	3.8 oz	(106.3 grams)
0.018 oz	(0.5 grams)	0.63 oz	(17.8 grams)	4.3 oz	(123.2 grams)
0.025 oz	(0.7 grams)	0.87 oz	(24.6 grams)	4.8 oz	(135.0 grams)
0.035 oz	(1.0 grams)	1.0 oz	(29.6 grams)	5.5 oz	(155.3 grams)
0.046 oz	(1.3 grams)	1.2 oz	(34.0 grams)	6.0 oz	(170.4 grams)
0.064 oz	(1.8 grams)	1.4 oz	(40.5 grams)	6.6 oz	(187.9 grams)
0.09 oz	(2.5 grams)	1.7 oz	(46.9 grams)	7.2 oz	(204.0 grams)
0.12 oz	(3.5 grams)	2.0 oz	(55.8 grams)	7.8 oz	(220.0 grams)
0.17 oz	(4.9 grams)	2.3 oz	(64.7 grams)	8.2 oz	(232.3 grams)
0.22 oz	(6.3 grams)	2.7 oz	(77.0 grams)	8.6 oz	(244.6 grams)
0.27 oz	(7.7 grams)				

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

Do not enter enclosed areas until the enclosed area has been vented unless wearing the appropriate PPE. Ventilation shall continue until after thirty (30) minutes of ventilation using fans or other mechanical ventilating systems.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-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.

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CONDITIONS OF SALE AND WARRANTY

AgroFresh, Inc warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **IN NO CASE WILL AgroFresh OR SELLER BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT.**

GENERAL INFORMATION

SmartFresh™ is a powder that, when mixed with water in a proprietary generating system, releases the volatile active ingredient 1-methylcyclopropene (1-MCP).

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit) and external sources of ethylene on harvested fruit. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit during transport and storage including:

- . Maintaining firmness
- . Maintaining titratable acidity
- . Preventing superficial scald and soft scald on pome fruit
- . Reducing internal ethylene production
- . Protection from external sources of ethylene
- . Reducing fruit respiration
- . Delaying ripening and senescence
- . Reducing incidence of peel greasiness in apples
- . Reducing incidence of core flush and mealiness in pome fruit
- . Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment and/or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, products should be treated as soon as possible after harvest.

Harvested fruits must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas should be gas tight as leakage will reduce SmartFresh™'s effectiveness.

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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. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

Fruit Storage Conditions

SmartFresh™ is compatible with and complementary to fruit stored under both controlled atmosphere and regular air fruit storage conditions. SmartFresh™ must be used in air tight treatment areas.

Timing Of Harvest And Application

SmartFresh™ should be added to the treatment area containing fruit immediately after harvest, upon entering storage or in transit. To realize maximum benefit for optimum quality, fruit should be pre-cooled promptly and SmartFresh™ should be applied in the treatment area as soon after harvest as possible and before the climacteric peak of respiration has occurred. Best results from SmartFresh™ are obtained with fruit at the optimum maturity level for long term storage. After application, fruit not for immediate sale must be stored, according to good standard commercial practices, in either refrigerated air or controlled atmosphere. Storage in controlled atmosphere is recommended for fruit that is to be held longer than 6 months.

It must be emphasized that maintaining the cold chain (keeping the fruit cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high-quality fruit. For optimum control of superficial scald on pome fruits, SmartFresh™ must be applied within two weeks of harvest.

APPLICATION METHOD

Prior to application, ensure that the treatment area can be properly and promptly sealed following application.

SmartFresh™ is applied by the use of proprietary generators which are available in two sizes: large and small. See Table 1 and Table 2 to select the appropriate size generator and SmartFresh™ pouches for the fruit and the size of the treatment area. Fill the treatment area with fruit. Place the appropriate generator on a stable surface of the treatment area in a position that would be within the flow of air from the internal refrigeration system.

Push the start button to activate the generator. With the generator running, add 2 gallons (8 liters) of water to the large generator, or 3 quarts (0.8 liters) of water to the small generator. Use water at a temperature between 20 degrees and 40 degrees Centigrade (68 to 104 degrees Fahrenheit). Remove the appropriate size SmartFresh™ water soluble pouches from the protective foil packets and drop the pouches into the water contained in the generator. Immediately leave the storage area and seal the door in order to contain the 1-MCP vapor and ensure the maximum efficacy of 1-MCP. The release of the 1-MCP to the area will start several minutes after the water soluble pouch is added to the generator.

After the area is sealed, post a sign on all of the entrances to the treatment area. The sign should read "CAUTION. Do not enter area. SmartFresh™ treatment in progress." The doors to the storage area should remain sealed for 24 hours to ensure effective SmartFresh™ treatment. Entrance to the room prior

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to 24 hours will invalidate the treatment. During the treatment, the internal refrigerated air circulation should be running to ensure good air circulation within the room. All vents to outside air should be closed, and any ethylene scrubbing devices or ozone generating equipment should be turned off. At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the generator. The spent water contained in the generator can be disposed by pouring down a suitable drain. Treated fruit not intended for immediate sale should be stored according to good, standard commercial practices, in either refrigerated air or controlled atmosphere. Storage in controlled atmosphere conditions is recommended for fruit that is planned to be held longer than 6 months.

Restrictions

Restricted Entry Period (REI): 30 minutes after room has been vented

Maximum season use rate: One application at a maximum use rate of 1 ppm (volume/volume in air) as delivered by appropriate sized generator and pouches (see Table 1 and Table 2 for generator and pouch selection)

Do not smoke during the SmartFresh™ application.

For temperate treefruit (apples, pears, plums, apricots, peaches, nectarines and kiwifruit), apply SmartFresh™ within two weeks of harvest.

For tropical treefruits (avocados, mangoes, papayas, persimmons), tomatoes and melons, apply within three days of harvest

Do not treat fruit stressed from poor fertility, heat, drought or sunscald

Do not treat fruit that have had a pre-harvest application of ethephon

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TABLE 1. Selection Of SmartFresh™ Pouches For Treatment Of Apples

Selection based on volume of treatment area. Calculate the treatment area volume by measuring the length, width and height of the treatment area in feet. Multiply these three numbers together to obtain the treatment area volume in cubic feet. For example, if a room is 4 feet wide , 5 feet long and 5 feet high, the treatment area volume equals 100 cubic feet.

Treatment Area Size (empty volume)	SmartFresh™ Pouch Size	
	ft ³	Oz. Grams
130 - 180	0.009	0.25
180 - 260	0.012	0.35
260 - 360	0.018	0.5
360 - 520	0.025	0.7
520 - 670	0.035	1.0
670 - 930	0.046	1.3
930 - 1300	0.064	1.8
1,300 - 1,900	0.09	2.5
1,900 - 2,600	0.12	3.5
2,600 - 3,300	0.17	4.9
3,300 - 4,000	0.22	6.3
4,000 - 4,800	0.27	7.7
4,800 - 6,700	0.32	9.1
6,700 - 9,300	0.45	12.9
9,300 - 12,800	0.63	17.8
12,800 - 15,400	0.87	24.6
15,400 - 18,000	1.0	29.6*♦
18,000 - 21,500	1.2	34.0*
21,500 - 25,000	1.4	40.5*♦
25,000 - 29,000	1.7	46.9*
29,000 - 34,000	2.0	55.8*♦
34,000 - 40,000	2.3	64.7*
40,000 - 46,000	2.7	77.0*♦
46,000 - 56,000	3.2	89.3*
56,000 - 64,000	3.8	106.3*♦
64,000 - 70,000	4.3	123.2*
70,000 - 82,000	4.8	135.0*♦
82,000 - 90,000	5.5	155.3*
90,000 - 100,000	6.0	170.4*♦
100,000 - 108,000	6.6	187.9*
108,000 - 118,000	7.2	204.0*♦
118,000 - 125,000	7.8	220.0*
125,000 - 136,000	8.2	232.3*♦
136,000 - 154,000	8.6	244.6*

- * These pouch sizes should only be used with the large (2 gallon capacity) generator
- ♦ May use multiple pouches for these treatments.

Note: Use multiple generators and pouches for treatment area sizes greater than those listed in the above table

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Table 2: Selection Of SmartFresh™ Pouch Size For Treatment Of Melons, Tomatoes, Pears, Avocados, Mangoes, Papayas, Kiwifruit, Peaches, Nectarines, Plums, Apricots and Persimmons

Selection based on volume of treatment area. Calculate the treatment area volume by measuring the length, width and height of the treatment area in feet. Multiply these three numbers together to obtain the treatment area volume in cubic feet. For example, if a room is 4 feet wide, 5 feet long and 5 feet high, the treatment area volume equals 100 cubic feet.

Treatment Area Size (empty volume)	SmartFresh™ Pouch Size	
	Ft ³	Oz.
210 - 300	0.009	0.25
300 - 420	0.012	0.35
420 - 600	0.018	0.50
600 - 830	0.025	0.7
830 - 1,180	0.035	1.0
1,180 - 1,550	0.046	1.3
1,550 - 2,100	0.064	1.8
2,100 - 3,000	0.09	2.5
3,000 - 4,200	0.12	3.5
4,200 - 5,600	0.17	4.9
5,600 - 7,100	0.22	6.3
7,100 - 8,600	0.27	7.7
8,600 - 11,100	0.32	9.1
11,100 - 15,700	0.45	12.9
15,700 - 21,700	0.63	17.8
21,700 - 30,000	0.87	24.6
30,000 - 41,400	1.2	34.0*
41,400 - 57,200	1.7	46.9*
57,200 - 78,900	2.3	64.7*
78,900 - 113,900	3.2	89.3*
113,900 - 146,500	4.3	123.2*
146,500 - 180,200	5.5	155.3*
180,200 - 216,500	6.6	187.9*
216,500 - 237,900	7.8	220.0*
237,900 - 273,700	8.6	244.6*

* These pouch sizes should only be used with the large size (2 gallon capacity) generator

Note: Use multiple generators and pouches for treatment area sizes greater than those listed in the above table.

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STORAGE AND DISPOSAL

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

Pesticide Storage: Store in original packaging in a cool, dry place.

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: Triple rinse the generator with water after use. Instructions for returning the used generators will be provided by AgroFresh Inc.

SmartFresh™ is a registered trademark of AgroFresh Inc./Rohm and Haas Company

**AgroFresh Inc.
A Fully-Owned Subsidiary of Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA. 19106
(215) 592-3000**