

73479-9

12/11/2008

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

December 11, 2008

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Richard Fresh, Director  
Regulatory Affairs  
Suterra LLC  
213 SW Columbia St.  
Bend, OR 97702-1013

RE: Product Name: Puffer CM/O  
EPA Reg. No: 73479-9  
Application for Label Notification Dated October 21, 2008 for Alternate Package Size

Dear Mr. Fresh:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notice (PRN) 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.

For any question you may have concerning this action, please contact Ms. Diana Hudson at (703) 308-8713 or email at [hudson.diana@epa.gov](mailto:hudson.diana@epa.gov).

Sincerely,

*Linda Hollis*

Linda Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention  
Division (7511P)

S838706

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United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number  
 259579

**Application for Pesticide - Section I**

1. Company/Product Number 73479-9	2. EPA Product Manager Ms. Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PUFFER CM-0	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) Suterra LLC 213 SW Columbia St. Bend, OR 97702-1013 <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**

**NOTIFICATION**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	Date Reviewed: _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application	Reviewed By: _____
<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.) NOTIFICATION OF Alternate Package Size per PR Notice 98-10 @ LIE. 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 for 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.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container		5. Location of Label Directions		
6. Manner in Which Label is Affixed to Product <input 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 RICHARD W. FRESH	Title DIRECTOR, REGULATORY	Telephone No. (Include Area Code) 541/317-2243
2. Signature 		3. Title DIRECTOR, REGULATORY
4. Typed Name RICHARD W. FRESH		5. Date 21 Oct. 2008
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)

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**Suterra**<sup>®</sup>

21 OCT 2008

Ms. Linda Hollis, Branch Chief  
USEPA/OPP/BPPD (7504P)  
Document Processing Desk (NOTIF)  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

ATTN: Mr. Andrew Bryceland

Re: **Notification Application**  
**PUFFER<sup>®</sup> CM-O, EPA Reg. No. 73479-9**  
**Alternate Size Puffer Can**

Dear Ms. Hollis:

Suterra LLC, 213 SW Columbia Street, Bend, Oregon 97702-1013, is submitting a Notification Application for the product PUFFER CM, EPA Reg. No. 73479-2. This Notification is for an alternate size puffer can.

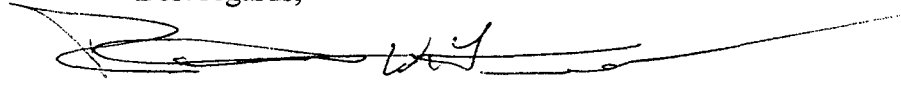
At the present time we have a container that holds 69.33 grams of active ingredient per canister and that is to last in the field for up to 200 days. The alternate size is for a container that holds 48.53 grams of active ingredient per canister and that is to last in the field for up to 140 days. This is equal to a 30% reduction in active ingredient load per canister with an equal reduction in efficacy time. This is provided on the alternate label.

Our technical field representatives were asked by the consumer for this change due to the fact that in some growing regions and for some crops the treatment period to harvest does not go beyond the 140 day period. **Absolutely nothing else has changed with the product label, the CSF, the manufacturing method, etc.**

I have been instructed that this Notification falls under PR Notice 98-10 at II E. Changes in Packaging and Related Labeling Statements. I have provided with this Notification a copy of the present label and copies of the alternate label highlighted to show the changes.

If there are any questions concerning this submission please contact me at: Tel: 541/317-2243; FAX: 541/317-2268 or e-mail: [rfresh@suterra.com](mailto:rfresh@suterra.com).

Best regards,



Richard W. Fresh, Director  
Regulatory Affairs  
Suterra LLC

# NOTIFICATION

Date Reviewed: 12-11-08

Reviewed By: D. Hudson

PRESENT PACKAGE SIZE

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye and skin irritation. Avoid breathing vapor. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

### FIRST AID STATEMENT

**IF INHALED:** 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 ON SKIN:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for advice.

**IF IN EYES:** Hold eye(s) open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, and continue rinsing. Call a Poison Control Center or doctor for advice.

**IF SWALLOWED:** Call a 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 a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

### HOT LINE NUMBER

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. You may also contact 1-866-328-6737 for emergency medical treatment information.

### ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

### PHYSICAL OR CHEMICAL HAZARDS

**Flammable.** Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. **PESTICIDE STORAGE:** Store container in cool, dry area away from heat or open flame. **PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.



**CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Remove from cabinet, wrap empty container in newspaper and discard in trash or at an approved waste disposal facility. Do not puncture or incinerate. If can is empty offer for recycling.

### WARRANTY

Suterra, LLC warrants that this material conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use. To the extent consistent with applicable law, Suterra neither makes nor authorizes any agent or representative to make, any other warranty of fitness or of merchantability, guarantee or representation, express or implied, concerning this material. To the extent consistent with applicable law, Suterra's maximum liability for breach of this warranty shall not exceed the purchase price of this product. To the extent consistent with applicable law, buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this material contrary to label instructions.

# CheckMate<sup>®</sup> Puffer CM-O

FOR ORGANIC PRODUCTION

Lasts up to 200 Days  
For the Control of Codling Moth  
In Apple, Pear and Walnut Orchards

CheckMate<sup>®</sup> Puffer CM-O contains a behavior modifying biochemical (pheromone) that disrupts the mating behavior of codling moth, *Cydia pomonella*. Use in apple, pear, walnut and other orchards where the codling moth is a pest. CheckMate Puffer CM-O is used with the CheckMate Puffer Aerosol Cabinet, an automatic metered dispenser, so that one puff of pheromone is delivered every 15 minutes throughout the night to disrupt the nocturnal mating behavior of codling moths.

Active Ingredient\*  
8,10 dodecadien-1-ol, (E,E) . . . . . 18.05 %  
Other Ingredients . . . . . 81.95 %  
Total . . . . . 100.00 %

\*Contains 69.33 g a.i. per canister;  
7.22 mg a.i. per 40 microliter puff

KEEP OUT OF REACH OF CHILDREN

## CAUTION

See side/back panel for First Aid and Precautionary Statements

Manufactured for:

# Suterra<sup>®</sup>

Suterra LLC  
213 SW Columbia St.  
Bend, Oregon U.S.A. 97702  
Phone: (866) 328-6737  
Fax: (541) 388-3705

EPA Registration No.: 73479-9  
EPA Establishment No. 9444-LA-1  
Net Contents: 13.5 oz (384 grams)  
Batch Code #: See bottom of can  
puffCM-O# 08/2008

### DIRECTIONS FOR USE

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

Do not apply more than 150 grams of active ingredient per acre per year.

**METHOD OF APPLICATION:** For use on apple, pear and walnut orchards and other crops where the codling moth is a pest. In the spring, start applications prior to moth emergence and continue throughout the crop's susceptible period, typically 80 to 180 days. Use a cabinet to automatically dispense the CheckMate Puffer CM-O canister. One puff of product is delivered every 15 minutes for a period of 12 hours, starting at 5 PM.

Placing cabinets in orchards and replacing canisters are to be done when cabinets are inactive, typically during daylight hours between 5 AM and 5 PM. To avoid accidental spraying ensure that canister nozzles are pointed away during the performance of these tasks.

One CheckMate Puffer CM-O canister will last approximately 200 days. Where effective disruption of codling moth mating requires longer application periods, replace used canisters before the 200 day period is reached.

**Product Placement:** Suspend a filled cabinet from a tree limb close to the center of the tree. Ideally, placement height will be approximately 2/3 of orchard height ±10%. Do not place cabinets where foliage, nuts or fruits can be directly sprayed. Where feasible a 3-foot clearance is requested.

**Orchards Smaller than 40 Acres:** Do not use CheckMate Puffer CM-O in orchards less than 40 acres unless adjacent acreage is also being treated with CheckMate Puffer CM-O and total acreage block being treated is 40 acres or more.

**40-Acre Orchard:** Place cabinets around the orchard perimeter or in a grid pattern to achieve a density of two (2) puffer canisters per acre. In situations with a prevailing wind place additional canisters along the upwind edge to achieve uniform pheromone distribution within the interior of the orchard.

**Orchards Greater than 40 Acres:** Place cabinets around the orchard perimeter or in a grid pattern to achieve a density of up to two (2) puffer canisters per acre. In situations with a prevailing wind place additional canisters along the upwind edge to achieve uniform pheromone distribution within the interior of the orchard.

**APPLICATION NOTES:** For best results apply at the time or shortly before the codling moths begin to emerge in the spring. This product only affects adult male moths and will have no effect on female moths, eggs or larvae. If application occurs following biofix (the first date moths are found consistently in monitoring traps) or during the growing season, the field must be treated with insecticides that will effectively control hatching larvae until egg laying by previously mated female moths has ceased to occur. In moderate to high insect pressure situations, supplemental insecticide applications during the season may be necessary to provide adequate protection. These supplemental insecticide applications must be made based on trap monitoring, field scouting, and appropriate degree-day models for the local growing area and must be timed to control young larvae. Monitor insect infestation with traps and by visual inspection of plants. Re-apply as needed, based on monitoring results and field scouting.

Date Reviewed: 12-11-08

Reviewed By: D. Hudson

ALTERNATE PACKAGE SIZE

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

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For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

**PHYSICAL OR CHEMICAL HAZARDS**

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

**STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal. **PESTICIDE STORAGE:** Store container in cool, dry area away from heat or open flame. **PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.



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**WARRANTY**

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**CheckMate®  
Puffer CM-O**

**FOR ORGANIC PRODUCTION**

**Lasts up to 140 Days  
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Active Ingredient\*  
8,10 dodecadien-1-ol, (E,E)..... 18.05 %  
Other Ingredients ..... 81.95 %  
Total ..... 100.00 %

\*Contains 48.53 g a.i. per canister;  
7.22 mg a.i. per 40 microliter puff

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See side/back panel for First Aid and Precautionary Statements

Manufactured for:

**Suterra®**

Suterra LLC  
213 SW Columbia St.  
Bend, Oregon U.S.A. 97702  
Phone: (866) 328-6737  
Fax: (541) 388-3705

EPA Registration No.: 73479-9  
EPA Establishment No. 9444-LA-1  
Net Contents: 9.45 oz (268 grams)  
Batch Code #: See bottom of can  
puffCM-O#-70 11/2008

**DIRECTIONS FOR USE**

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5/5