

Georgia Anastasiou
Agent for Pace Chemicals LTD
122 C Street N W Suite 740
Washington DC 20001

FEB 23 2012

SUBJECT KleenGrow
EPA Registration Number 81820 2
Application Dated January 23 2012
Receipt Date January 24 2012

Dear Ms Anastasiou

This letter acknowledges receipt of the notification identified above submitted under the provisions of section 3 (c) 9 of the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) as amended and PR Notice 98 10 and 40 CFR 152 46

- Propose to change the cleaning dilution rate for Tools Cutters and equipment from 0 5 fl oz to a range of 0 25 0 50 fl oz

Based on a review of the submitted information this notification is acceptable A copy has been inserted in your file for future reference

General Comments

Should you have any questions concerning this letter please contact Emilia Oiguenblik at (703) 347 0199 or Velma Noble at (703) 308-6233

Sincerely



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

CONCURRENCES

| SYMBOL | SURNAME | DATE |
|--------|---------|------|
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United States
Environmental Protection Agency
Washington DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide – Section I

| | | |
|--|---|---|
| 1 Company/Product Number 81820 2 | 2 EPA Product Manager Velma Noble | 3 Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4 Company/Product (Name) KleenGrow | PM# 31 | |
| 5 Name and Address of Applicant (Include ZIP Code) Pace Chemicals Ltd 8321 Willard Street Burnaby BC Canada V3N 2X3 <u>PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW</u> <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

- Amendment – Explain below
- Final printed labels in response to Agency letter dated _____
- Resubmission in response to Agency letter dated _____
- Me Too Application
- Notification – Explain below
- Other – Explain below

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

Notification to Change Cleaning Dilution Rate For Tools, Cutters and Equipment
Please Read Cover Letter for Details

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

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 |
| *Certification must be submitted | | If Yes Unit Packaging wgt No per container | If Yes Package wgt No per container | <input type="checkbox"/> Glass | <input type="checkbox"/> Paper |
| 3 Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4 Size(s) Retail Container | | 5 Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product | |
| 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 Georgia Anastasiou Lewis & Harrison LLC 122 C Street NW Suite 740 Washington DC 20001 | Title Agent for Pace Chemical Ltd | Telephone No (Include Area Code) 202 393 3903 x 19 | |
| 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 <i>Georgia Anastasiou</i> | 3 Title Agent for Pace Chemical Ltd | | |
| 4 Typed Name Georgia Anastasiou | 5 Date January 23 2012 | | |

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LEWIS & HARRISON

122 C Street NW Suite 740
Washington DC 20001
telephone 202 393 3903
fax 202 393 3906

Consultants in Government Affairs

January 23 2012

HAND DELIVERED

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 **Velma Noble**
 Product Manager, Team 31

SUBJECT **Pace Chemicals Ltd**
 KleenGrow (EPA Reg No 81820 2)
 Notification per PR Notice 98 10

Dear Ms Noble

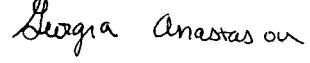
As agent for Pace Chemicals Ltd I am submitting a notification for the product **KleenGrow (EPA Reg No 81820 2)** The purpose of this notification is to change the cleaning dilution rate for Tools Cutters and Equipment from 0.5 fl oz to a range of 0.25 - 0.50 fl oz. Please note that this is only a change in the cleaning directions.

Enclosed please find the following documents in support of this submission:

- a Application for Pesticide Notification
- b One (1) copy of the revised label with changes highlighted and
- c Two (2) copies of the revised label

Thank you for your assistance with this submission. If you have any questions or need further assistance please call me at 202 393 3903 x 19 or e-mail me at georgia@lewisharrison.com

Sincerely



Georgia Anastasiou
Agent for
Pace Chemicals Ltd

cc Wesley Martin Pace Chemicals Ltd

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KleenGrow

**Algicide Fungicide Bactericide
Disinfectant Cleaner Virucide**

**For controlling Fungal and Bacterial plant pathogens on Ornamentals, Potted Plants,
Cut Flowers, Nursery Stock in Greenhouses and in Irrigation Lines**

**For Use as a Cleaner, General Disinfectant and for Microbial Control on
Hard, Non Porous Surfaces in Greenhouses, Storage Barns and Coolers, Livestock Facilities
including Poultry, Swine, Alligator, Crocodile, and Cattle and Industrial Facilities and on Farms**

| | |
|------------------------------------|--------|
| Active Ingredient | |
| Didecyl dimethyl ammonium chloride | 7 5% |
| Other Ingredients | 92 5% |
| TOTAL | 100 0% |

**KEEP OUT OF REACH OF CHILDREN
DANGER**

EPA Registration No 81820 2

EPA Establishment No 49292 WA 1

NET CONTENTS [1 qt (0 946 liter)] [1 gallon (3 78 liters)] [5 gallons (18 9 liters)] or [30 gallons
(114 liters)] [55 gallons (207 9)] [275 gallon (1040 litres)]

**[PACE CHEMICALS LTD]
[D/B/A] Pace 49, Inc
8321 Willard Street
Burnaby B C
V3N 2X3
CANADA
1 800 799 6211
www.pacechem.com**

NOTIFICATION
Date Reviewed 3/23/12
Reviewed By: [Signature]

| FIRST AID | |
|--|---|
| If in Eyes | <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 20 minutes then continue rinsing eye • Remove contact lenses if present after the first 5 minutes then Continue rinsing the eye • 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 Swallowed | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice • Do not induce vomiting unless told so by a poison control center or doctor • Do not give anything by mouth to an unconscious person |
| Have the product container or label with you when calling a poison control center or doctor or going for treatment | |
| NOTE TO PHYSICIAN Probably mucosal damage may contraindicate the use of gastric lavage | |

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER Corrosive Causes irreversible eye damage Causes skin burns Do not get in eyes on skin or on clothing Harmful if swallowed or absorbed through the skin Wear protective eyewear (goggles face shield or safety glasses) protective clothing and rubber gloves Wash thoroughly with soap and water after handling and before eating drinking chewing gum using tobacco or using the toilet Remove and wash contaminated clothing before reuse

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates Do not discharge effluent containing this product into lakes streams ponds estuaries oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority For guidance contact your State Water Board or Regional Office of the EPA

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STORAGE AND DISPOSAL

Do not contaminate water food or feed by storage or disposal

Pesticide Storage Do not store on side Avoid creasing or impacting of side walls

Pesticide Disposal Pesticide wastes are acutely hazardous 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

Note to reviewer Following language would be used for containers equal to or less than 5 gallons

Container Disposal Nonrefillable container Do not reuse or refill this container Triple rinse container (or equivalent) promptly after emptying Triple rinse as follows Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip Fill the container ¼ full with water and recap Shake for 10 seconds Follow pesticide disposal instructions for rinsate Drain for 10 seconds after the flow begins to drip Repeat this procedure two more times Then offer for recycling if available or puncture and dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities by burning If burned stay out of smoke

Note to reviewer Following language would be used for containers greater than 5 gallons

Container Disposal Nonrefillable container Do not reuse or refill this container Triple rinse container (or equivalent) promptly after emptying Triple rinse as follows Empty the remaining contents into application equipment or a mix tank Fill the container ¼ full with water Replace and tighten closures Tip container on its side and roll it back and forth ensuring at least one complete revolution for 30 seconds Stand the container on its end and tip it back and forth several times Turn the container over onto its other end and tip it back and forth several times Follow pesticide disposal instructions for rinsate Repeat this procedure two more times Then offer for recycling if available or puncture and dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities by burning If burned stay out of smoke

Note to Reviewer Agricultural/Farm Use Language

[Note to Reviewer the following language is only required for Agriculture/Farm uses]

Personal Protective Equipment (PPE)

Applicators and other handlers must wear protective eyewear long pants and long sleeved shirt shoes plus socks and chemical resistant gloves Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product s concentrate Do not reuse them 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

[Note to Reviewer the following language is only required for Agriculture/Farm uses]

User Safety Requirements

- Wash hands before drinking eating chewing gum using tobacco or using the toilet
- Remove PPE clothing immediately if the 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

[Note to Reviewer the following language is only required for Agriculture/Farm uses]

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard 40 CFR 170 This standard contains requirements for the protection of agricultural workers on farms forest nurseries and greenhouses and the 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) restricted entry interval and notification to workers The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (Note The REI does not apply to hard surface or irrigation line disinfection)

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours The REI is not required when using the product for end of season irrigation line cleaning and microbial control

For early entry into treated area permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants soil or water workers must wear coveralls chemical resistant gloves shoes plus socks and protective eyewear

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

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling

[Note to Reviewer the following language is only required for Agriculture/Farm uses]

Do not use in greenhouses where food crops are grown For treatment of ornamentals in greenhouses only 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 requirement specific to your State or Tribe consult the agency responsible for pesticide regulation

NOTE KleenGrow may be phytotoxic to some ornamental plants and phytotoxicity may develop after repeated applications in a short time interval A test spray or drench is recommended before treating the entire crop, especially when using the higher recommended concentration Use with caution on young seedlings or tender young growth

GENERAL CLEANING AND MICROBAL CONTROL

Pythium Control in Irrigation Systems – “End of Season”

- 1 Rinse irrigation lines of debris prior to cleaning by filling them with a 1.25 fl oz of STRIP IT per gallon of water
- 2 Allow STRIP IT to sit for up to 12 hours before flushing with clean water
- 3 Fill irrigation system with KleenGrow at 0.5 fl oz per gallon of water and allow solution to sit for at least 10 minutes
- 4 Drain lines thoroughly allow to air dry and then recharge with nutrient solution

Botrytis, Powdery Mildew, Downy Mildew, Fusarium, Xanthomonas, Thielaviopsis, Fungal and Bacterial Leaf Spots and Blights for Ornamental Plants, Nursery Stock, and Bare Root Cuttings Foliar Spray

Apply KleenGrow starting at Week 3 or earlier if conditions are favorable for disease Use a watering device to spray the top and bottom of the leaves and stems avoiding flowers in full bloom at a rate of 0.06 to 0.38 fl oz per gallon of water (90 to 300 ppm a.i.) every 14 days Apply KleenGrow with a direct spray every 14 days to prevent the spread of spores and the build up of organic material Remove severely infected plants and disinfect the area with 1.0 fl oz KleenGrow per 1 gallon of water

Botrytis Control for Ornamental Plants, Nursery Stock, and Bare Root Fogging in Coolers (Not to be used on food crops within coolers or vegetable greenhouse applications)

Use fogging equipment to control botrytis on cut flowers and potted plants in coolers with a rate of 0.25 - 0.5 fl oz per gallon of water

Root Rots - Preventative Drench Thielaviopsis, Pythium, Rhizoctonia Phytophthora

Apply KleenGrow by injecting 0.06 to 0.5 fl oz per gallon of water (35 to 300 ppm a.i.) once each 14 days making sure that the root zone is completely wet with solution KleenGrow drench can be done with fertilizer injector pumps automatic dosing pumps or for smaller operations by hand using protective gloves

Seed, Bulb and Corm Rots Dip (pre planting) Botrytis, Rhizoctonia, Fusarium Penicillium, Erwinia, Pseudomonas

For control of Botrytis Rhizoctonia Fusarium and Penicillium bulb rots and other fungal and bacterial diseases of tulip narcissus gladiolus crocus dahlia freesia iris lily daylily amaryllis hyacinth iris scilla and ornamental onion Immerse both crate and bulbs in a solution of 0.15 to 1.5 fl oz KleenGrow per 1 gallon of water (90 to 900 ppm a.i.) for 30 sec Remove from solution and allow to drain prior to planting or storage Test solution regularly using QAC test strips (La Motte #2949 BJ or equivalent) Add KleenGrow when necessary to maintain a.i.a.i concentration between 90 and 900 ppm

Note to Reviewer Hard Surface & Non Ag Use Language

GREENHOUSE AND INDUSTRIAL USE

Disinfection of Hard, Non Porous Surfaces

Use 1 fl oz of **KleenGrow** per gallon of water Apply solution with a cloth mop sponge coarse spray device or by immersion to previously cleaned hard nonporous surfaces until surfaces are thoroughly wet Treated surfaces must remain wet for 10 minutes Wipe dry with a clean cloth or sponge or allow to air dry Prepare a fresh solution daily or more often if solution becomes visibly diluted or soiled

Disinfection of Packing Facility and Equipment

Remove debris and thoroughly clean all surfaces of packing equipment with soap or detergent and rinse with water Saturate all surfaces with a solution of 1 fl oz of **KleenGrow** per gallon of water for 10 minutes Wipe dry with a clean cloth or sponge or allow to air dry Ventilate closed spaces If treated surfaces will come in contact with food thoroughly rinse surfaces with potable water

Disinfection of Trucks and Transportation Equipment

Remove debris and thoroughly clean all surfaces of trucks and other transportation equipment with soap or detergent and rinse with water Saturate all surfaces with a solution of 1 fl oz of **KleenGrow** per gallon of water for 10 minutes Wipe dry with a clean cloth or sponge or allow to air dry Ventilate closed spaces If treated surfaces will come in contact with food thoroughly rinse surfaces with potable water

Disinfection of Tools, Cutters and Equipment

Thoroughly wash all tools cutters and small equipment with soap or detergent and rinse with water Saturate all surfaces with a solution of 1 fl oz of **KleenGrow** per gallon of water for 10 minutes Wipe dry with a clean cloth or sponge or allow to air dry

GREENHOUSE USE

GENERAL CLEANING AND MICROBAL CONTROL (plant pathogens and algae)

Tools, Cutters and Equipment

Thoroughly wash all tools cutters and small equipment with soap or detergent and rinse with water Saturate all surfaces with a solution of 0.25 to 0.5 fl oz of **KleenGrow** per gallon of water for 10 minutes Wipe dry with a clean cloth or sponge or allow to air dry

Algae Removal from Walls, Benches, Floors Walkways, Pens, and Workways

Thoroughly wash all walls benches or floors with soap or detergent and rinse with water Saturate all surfaces with a solution of 0.125 – 0.25 fl oz of **KleenGrow** per gallon of water for 10 minutes Wipe dry with a clean cloth or sponge or allow to air dry Ventilate closed spaces Re apply **KleenGrow** every 14 days to keep algae from returning soap or detergent is not necessary with reapplication of **KleenGrow** unless surfaces are heavily soiled

Algae, Fungus and Odor Control in Evaporative Cooling Pads

Add 0.03 to 0.25 fl oz of **KleenGrow** per gallon of water to evaporative cooling pad system once a month to control disease and algae buildup

Shoebaths

Prepare a solution of **KleenGrow** at a dilution of 1.0 – 2.0 fl oz per gallon of water. Pour this solution into a footbath to a depth of 1/2 to 1" or on a foot mat to the top of the ribs.

Check shoebath frequently with Quaternary Ammonium Chloride (QAC) test strips such as La Motte QAC test strips to ensure rate is 600 ppm (1.0 fl oz per gallon of water) or above. Add additional **KleenGrow** solution as necessary to keep a 1" at proper level or change the solution if it appears visibly soiled.

First clean shoes or boots of all debris by scraping.

To Wash Footwear Place in shoebath for at least **30 seconds**

FARMS AND LIVESTOCK PREMISES

Farm Premise Use

Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks and other feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with a use solution of 1.0 fl oz of **Kleengrow** per gallon of water [or equivalent dilution] for a period of 10 minutes. Immerse all halters, ropes and other types of equipment used in handling and restraining animals as well as forks, shovels and scrapers used for removing litter and manure. Ventilate buildings, cars, boats and other closed spaces. Do not house livestock or employ equipment until treatment has been absorbed, set or dried. Thoroughly scrub all treated feed racks, mangers, troughs, automatic feeders, fountains and waterers with soap or detergent and rinse with potable water before reuse.

Livestock Premise Disinfection directions

Remove all animals and feeds from premises, vehicles and enclosures such as coops and crates. Remove all litter, droppings and manure from floors, walls and surfaces of barns, pens, stalls, chutes and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks and other feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. 1.0 fl oz of **Kleengrow** per gallon of water. Saturate surfaces with the disinfecting solution for 10 minutes. Immerse all halters, ropes and other types of equipment used in handling and restraining animals as well as forks, shovels and scrapers used for removing litter and manure. Ventilate buildings, coops and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed, set or dried. Thoroughly scrub all treated feed racks, mangers, troughs, automatic feeders, fountains and waterers with soap or detergent and rinse with potable water before reuse.

Hatcheries

Use 1.0 fl oz of **Kleengrow** per gallon of water to treat hatcheries, setters, trays, racks, carts, sexing tables, delivery trucks and other hard nonporous surfaces. Use 2 oz per gallon of water to kill Adenovirus Type 5 and type 7. Leave all treated surfaces wet for 10 minutes or more. Wipe dry with a clean cloth or sponge or allow to air dry.

Disinfecting Vehicles

Treat all vehicles including mats, crates, cabs and wheels with water and **Kleengrow**. Use 1.0 fl oz of **Kleengrow** per gallon of water to treat all vehicles. Leave all treated surfaces wet for 10 minutes or more. Wipe dry with a clean cloth or sponge or allow to air dry.

CONTROL OF FUNGAL AND BACTERIAL DISEASES ON ORNAMENTAL CROPS

Do not apply to fruits or vegetables or other food crops. This product is to be used in greenhouses and not outdoors. Do not spray directly on fruits and vegetables. Do not apply to tools or equipment that will contact food.