



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**NOTIFICATION**

Ana Rodriguez-Koster  
Agent for Quimas S.A.  
Lewis & Harrison LLC  
122 C Street, N.W. Suite 740  
Washington, DC 20001

MAR 21 2008

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Ms. Rodriguez-Koster:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated February 27, 2008 for:

**EPA Registration 83131-1**

**SMARTPAC**

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identify the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Nicole Williams of my staff at 703-308-5551.

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

# LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740  
Washington, D.C. 20001

telephone 202.393.3903  
fax 202.393.3906

February 27, 2008

**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: Tony Kish**  
**Product Manager, Team 22**

**SUBJECT: QUIMAS S.A.**  
**SMARTPAC (EPA Reg. No. 83131-1)**  
**Notification of Label Change per PR Notice 2007-4**

Dear Mr. Kish:

On behalf QUIMAS S.A., I am submitting an application for pesticide Notification to revise the Storage and Disposal language for the above-referenced product in accordance with PR-Notice 2007-4 and 40 CFR Part 156.

As you know, **SMARTPAC** is a flexible plastic liner impregnated with sodium metabisulfite so the product is not required to list residue removal instructions. Furthermore, additional research performed by QUIMAS shows that the **SMARTPAC** liner is indeed recyclable, with no residue of the active ingredient left once the liner completes the normal recycling process for plastics. This is due to the fact that the normal recycling process for plastics (LDPE) requires the reprocessing of LDPE with sulfate salt at temperatures of 180°C to 220°C (that is, 356°F to 428°F). These elevated temperatures provide favorable conditions to degrade any remaining sodium metabisulfite, which in itself is a very unstable molecule. Based on these findings, QUIMAS is taking the opportunity to add appropriate recycling information to the product's label.

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

1. Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 2007-4;
2. One (1) copy of the proposed label, with changes highlighted; and,
3. One (1) clean copy of the proposed label.

Thank you for your assistance with this Notification. If you have any questions, please call me at 202.393-3903 x.17 or e-mail me at [alkoster@lewisharrison.com](mailto:alkoster@lewisharrison.com) if you have any questions.


Sincerely,



Ana Rodriguez-Koster  
for,  
QUIMAS S.A.

Enclosures

cc: Sole Santiago, QUIMAS S.A.

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> <b>Other: Notification</b>	OPP Identifier Number <b>265394</b>
	<b>Application for Pesticide - Section I</b>		

1. Company/Product Number <b>83131-1</b>	2. EPA Product Manager <b>Tony Kish</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>SMARTPAC</b>	PM# <b>Team 22</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>QUIMAS S.A.</b> <b>Los Yacimientos 1301, Maipu</b> <b>Santiago, CHILE</b> <b><u>PLEASE DIRECT ALL CORRESPONDENCE TO</u></b> <b><u>"CONTACT POINT" LISTED BELOW</u></b> <input type="checkbox"/> Check if this is a new address		6. <b>Expedited Review.</b> 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.)

**NOTIFICATION OF LABEL CHANGE PER PR-NOTICE 2007-4. SEE COVER LETTER FOR DETAILS.**

**Notification of LABEL CHANGE in Accordance With PR Notice 2007-4**

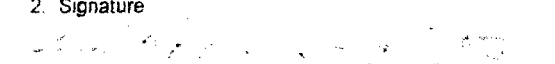
*This notification is consistent with the guidance in PR Notice 2007-4 and EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, 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.*

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<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. 80 grams (2.822 oz.)    No. per container 250 liners		If "Yes" Package wgt. _____    No. per container _____			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Wholesale box containing 250 liners		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"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name: <b>Ana Rodriguez-Koster, Lewis and Harrison, LLC</b> <b>122 C St., NW Suite 740</b> <b>Washington, DC 20001</b>	Title: <b>Agent for QUIMAS S.A.</b>	Telephone No. (Include Area Code): <b>(202) 393-3903 ext. 17</b>
<b>Certification</b> 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 <b>(Stamped)</b>
2. Signature 	3. Title: <b>Agent for QUIMAS S.A.</b>	
4. Typed Name <b>Ana Rodriguez-Koster, Lewis &amp; Harrison LLC</b>	5. Date <b>2/27/2008</b>	

[WHOLESALE LABEL]

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INTELLIPACK

# SMARTPAC

U.S. EPA Reg. N<sup>o</sup> 83131-1  
U.S. EPA Est. N<sup>o</sup> 83342-CHL-001

For use as a preservative on table grapes

<b>ACTIVE INGREDIENT:</b> Sodium Metabisulfite (Na <sub>2</sub> S <sub>2</sub> O <sub>5</sub> ).....	8.6625%
<b>INERT INGREDIENTS:</b> .....	91.3375%
<b>TOTAL:</b> .....	100.0000%

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

See [Side] [Back] [Left] [Right] [Other] Panel for Additional Precautionary Statements

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**CAUTION.** Harmful if inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust. Wear chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Prolonged or repeated skin contact may cause allergic reactions in some individuals.

#### FIRST AID:

<b>If Inhaled:</b>	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.
<b>If in Eyes:</b>	Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for further treatment advice.
<b>If on Skin or Clothing:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

#### DIRECTIONS FOR USE:

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

#### AGRICULTURAL USE:

To assure freshness by the fungicidal control of *Botrytis cinerea* on table grapes.

- Place grape bunches in carry bags, if desired, and pack in SMARTPAC liner. Do not place more than 8.2 kg (18 lbs.) of grapes within each liner.
- Place liner (with grapes) in an appropriate shipping container (box) and seal the container (box).
- Place the boxes of packed grapes in refrigerated storage at 0°-2°C (32°-35.6°F). Always keep liner closed during storage.
- Remove liner before display of grapes for sale or after removal of box container from retail store refrigeration facilities.

[WHOLESALE LABEL]

**STORAGE AND DISPOSAL:**

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

**Pesticide Storage:** Keep this product in a tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat and flame.

**Pesticide Disposal:** In case of decomposition, isolate container and flood area with large amounts of water to dissolve all material before discarding the liner. Flush with water down the sewer. Collect used and damaged pads for disposal in a polyethylene garbage bag. Tie bag and place in regular trash receptacle.

**Container Disposal:** Individual Liners: Non-refillable bags. Do not reuse or refill bags. Offer for recycling, if available. Outside Shipping Container: Non-refillable container. Do not re-use or refill this container. Offer for recycling, if available. ~~Do not reuse empty bag, but place in trash collection. Do not recycle empty bag.~~

Net Contents: \_\_\_\_\_  
(7 grams sodium metabisulfite loaded into each liner)

Batch No. \_\_\_\_\_

Manufactured by: **QUIMAS S.A.**  
Los Yacimientos 1301 • Maipu • Santiago • Chile  
Tel.: (56-2) 381 7000 • Fax (56-2) 381 7191 • [intellipack@intellipack.cl](mailto:intellipack@intellipack.cl)

6/6

[LINER LABEL]

INTELLIPACK

# SMARTPAC

U.S. EPA Reg. N° 83131-1  
U.S. EPA Est. N° 83342-CHL-001

For use as a preservative on table grapes

<b>ACTIVE INGREDIENT:</b> Sodium Metabisulfite (Na <sub>2</sub> S <sub>2</sub> O <sub>5</sub> ).....	8.6625%
<b>INERT INGREDIENTS:</b> .....	91.3375%
<b>TOTAL:</b> .....	100.0000%

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

See Box Label for Additional Information

### DIRECTIONS FOR USE:

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

### AGRICULTURAL USE:

To assure freshness by the fungicidal control of *Botrytis cinerea* on table grapes.

Remove liner before display of grapes for sale or after removal of box container from retail store refrigeration facilities.

### DISPOSAL:

Non-refillable bag. Do not reuse or refill this bag. Offer for recycling, if available. ~~Do not reuse empty bag, but place in trash collection. Do not recycle empty bag.~~

Net Contents: 80 grams (2.822 ounces)  
(7 grams of sodium metabisulfite loaded into liner)

Batch No. \_\_\_\_\_

Manufactured by: **QUIMAS S.A.**  
Los Yacimientos 1301 • Maipu • Santiago • Chile  
Tel.: (56-2) 381 7000 • Fax (56-2) 381 7191 • [intellipack@intellipack.cl](mailto:intellipack@intellipack.cl)

PAT.: CSIRO



LDPE

US 6776998  
CL 1357-99  
ZA 2001/0247  
EP/EU 99930938.8  
VENT. 0.3%  
30x40cm  
[info@intellipack.cl](mailto:info@intellipack.cl)