

86381-1

11/2/2010

10 of 5



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Catherine M. Byrd  
Pimi Agro Clean Tech, Ltd.  
c/o Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

NOV 02 2010

Subject: Notification to Change Primary Brand Name per PRN 98-10  
Product Names: SpuDefender  
EPA Reg. No: 86381-1  
Your Submission Dated October 18, 2010

Dear Ms. Byrd:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notice (PRN) 98-10, as referenced above. A screen of this request has been conducted for applicability under PRN 98-10, and it has been determined that the action request falls within the scope of this document. Our records have been duly noted, and the product label submitted with this application has been stamped "Notification Accepted" and will be placed in our records as current and updated. Should you have any questions regarding this action, you may contact Gina Casciano at (703) 605-0513 or via email at [casciano.gina@epa.gov](mailto:casciano.gina@epa.gov).

Sincerely,

*Linda Hollis*

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

2005



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
Amendment  
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 86381-1	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None      Restricted
4. Company/Product (Name) SpudDefender	PM#	
5. Name and Address of Applicant (Include Zip Code) Pimi Agro Clean Tech, Ltd. c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <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 being submitted for expedited review and labeling to: <b>Notification Accepted</b> <b>Date:</b> 11/2/10 <b>Reviewer:</b> G. Casciano	

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. <b>PRIMARY BRAND NAME</b>	<input checked="" type="checkbox"/> Other - Explain below.

Explanation:

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 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"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes"      No. per Unit Packaging wgt.      container	If "Yes"      No. per Package wgt      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 264 gallons		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"/> Paper glued <input type="checkbox"/> Stenciled			Other _____ adhesive backed label _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Catherine M Byrd	Title Agent for Pimi Agro Clean Tech, Ltd.	Telephone No. (Include Area Code) (302) 234 2780
2. Signature <i>Catherine M. Byrd</i>		3. Title Agent for Pimi Agro Clean Tech, Ltd
4. Typed Name Catherine M. Byrd		5. Date October 18, 2010
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>





# SpuDefender™

Post-Harvest Potato Sprout Control

**ACTIVE INGREDIENT:**

Hydrogen Dioxide..... 6.00%

**OTHER INGREDIENTS..... 94.00%**

**TOTAL..... 100.00%**

**KEEP OUT OF REACH OF CHILDREN**

**DANGER – PELIGRO**

*Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.  
(If you do not understand this label, find someone to explain it to you in detail.)*

FIRST AID	
If in eyes	<ul style="list-style-type: none"> <li>Hold eye open and rinse gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul style="list-style-type: none"> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
Have the product container of label with you when calling a poison control center or doctor, or going for treatment. National Poison Control Center Hotline 1-800-222-1222	
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage.	

Manufactured for:  
**PIMI AGRO CLEANTECH, INC.**  
269 South Beverly Drive suite 1091  
Beverly Hills California 90212 USA  
Phone (310) 435-7988

Net Contents ~ 264 U.S. Gallons (Bulk)(1,000 Liters)(20 liters)

EPA Reg. No. 86381-1 ..... EPA Establishment No. \_\_\_\_\_

EPA Approved Label with Primary Brand Name Change (7OCT10)

**PRECAUTIONARY STATEMENTS**

**DANGER**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Danger. Corrosive: causes irreversible eye damage. May be fatal if inhaled. Do not breathe vapor or spray mist. Wear the respiratory protection required in the "Personal Protective Equipment" section below. Remove and wash contaminated clothing before reuse. Harmful if swallowed, or absorbed through the skin. Do not get in eyes on skin or on clothing. Wear goggles, face shield, or safety glasses when handling this product. 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

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Applicators, handlers and other workers that are in an enclosed area where applications are being made, for example in a potato storage room being fogged or next to a sprayer of a sorting/packing line, must wear:

- coveralls over long-sleeved shirt, long pants
- chemical resistant footwear plus socks.
- goggles or face shield
- rubber gloves
- For handling activities in an enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F.

Follow the 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. If no such instructions exist for washables, use detergent and hot water. Follow manufacturer's instructions for cleaning/maintaining PPE

**USER SAFETY RECOMMENDATIONS**

Users should 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 HAZARDS**

FOR TERRESTRIAL USES. Keep out of lakes, ponds and streams. This pesticide is toxic to birds and fish. Do not apply directly to water, or to areas where surface water is present or to inter-tidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wash waters. This product is highly toxic to bees and other beneficial insects exposed to direct contact on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. Do not apply this product or allow it to drift to crops where beneficials are part of an Integrated Pest Management strategy.

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.

**PHYSICAL AND CHEMICAL HAZARDS**

Corrosive. Strong oxidizing agent. Do not use in concentrated form. Mix only with air in accordance with label instructions. Never bring concentrate in contact with other pesticides, cleaners or oxidative agents.

**Notification Accepted**

Date: ~~11/2/10~~ 11/2/10

Reviewer: G. Casciano



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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.

**Entry Restrictions**

Do not enter or allow any person, other than a person equipped with the appropriate handler personal protective equipment including appropriate respirator, to enter the treated area until the area has been ventilated. Ventilation may be for either a total of (2) hours with fans or other mechanical ventilation or four (4) hours with windows, vents, or other passive ventilation, or until such time that there have been 10 complete air exchanges. The ventilation may be interrupted, i.e., the time may be accumulated at sporadic intervals, such as 15 minutes of ventilation followed by a period of no ventilation, until the total required ventilation time has accumulated.

**Application Instructions**

SpuDefender™ can be applied after dilution with water when potatoes enter storage or anytime after potatoes are placed in storage using Pimi fogging equipment or on the packing line after SpuDefender is diluted with water.

CROP	DILUTION RATE	APPLICATION DIRECTIONS	TIMING
Newly harvested potatoes	SpuDefender is concentrated product; it has to be diluted with water at rate of 1 part SpuDefender to 5 parts water.	Apply 6 pints of a 1:5 dilution of SpuDefender per ton evenly onto potatoes through spray nozzles placed across the rollers on which the potatoes are being moved into storage.	Apply onto newly harvested potatoes entering storage.
Potatoes in storage	SpuDefender is concentrated product; it is to be applied as a fog via the Pimi ultrasonic fogger only. Electrical Pimi fogging system: Automatic mixer will dilute 21 pints /hour of SpuDefender concentrate with 7000 cubic foot of air.	Use the Pimi Electrical Ultrasonic fogging unit. Use up to 7 fl. oz. of concentrated SpuDefender per ton of potato to create a fog. The electrical fogger will dilute SpuDefender to a ratio of 1:20,000. At the maximum rate of 7 fl. oz. the dilution ratio is equivalent to 0.25% hydrogen peroxide in the storage bin atmosphere.	Apply solution every 2-6 weeks as needed to control sprouting.
Postharvest potatoes after storage and in sorting/packing line	SpuDefender is concentrated product; it has to be diluted with water at rate of 1 part SpuDefender to 5 parts water.	Apply 6 pints of a 1:5 dilution of SpuDefender per ton evenly onto potatoes through spray nozzles placed across the rollers on which the potatoes are being moved.	Apply onto potatoes as they move along sorting/packing line.

**STORAGE AND DISPOSAL**

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

**Storage:** Store SpuDefender™ in a cool, dry place away from food, drink, and animal feeding stuffs.

**Container Disposal:** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

**Notice:** Read the entire Directions for Use and Conditions for Sale and Limitation of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of PIMI AGRO CLEANTECH, INC, or Seller. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer and User, and Buyer and User agree to hold PIMI AGRO CLEANTECH, INC and Seller harmless for any claims to such factors.

PIMI AGRO CLEANTECH, INC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. To the extent consistent with applicable law, this warranty does not extend to the use of the product contrary to proper instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or PIMI AGRO CLEANTECH, INC, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, PIMI AGRO CLEANTECH, INC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

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Pimi Agro CleanTech Inc and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sales and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Pimi Agro Clean Tech Inc.

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