

86381-2

3/13/2013

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

March 13, 2013

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Georgia Anastasiou
Consultant for Pimi Agro CleanTech, Ltd.
Lewis & Harrison
122 C Street, N.W., Suite 505
Washington, D.C. 20001

Subject: FreshProtect
EPA Registration No.: 86381-2
Application Date: 02/26/2013
Receipt Date: 02/27/2013

Dear Ms. Anastasiou:

This letter acknowledges receipt of your notification submitted under the provision of FIFRA section 3(c)9 and PR Notice 98-10.

Proposed Notification

- Addition of spoilage organism, *Penicillium digatatum* (green mold)

General Comments

Based on a review of the submitted materials, your notification for the addition of the spoilage organism, *Penicillium digatatum* (green mold) is acceptable and has been made a part of your file.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Jaclyn Pyne by telephone at (703) 347-0213 or by e-mail at pyne.jaclyn@epa.gov. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacqueline Campbell-McFarlane".

Jacqueline Campbell-McFarlane
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

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

1. Company/Product Number 86381-2	2. EPA Product Manager Jacqueline Campbell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) FreshProtect	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Pimi Agro CleanTech, Ltd c/o Lewis & Harrison, LLC 122 C Street, Suite 505 Washington DC, 20001 <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

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification in accordance with PR Notice 98-10. Please read cover letter for details

Notification of label change per PR Notice 98-10. This notification is consistent with the guidance in PR Notice 98-10 and the requirements of 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 statements 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.

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 If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)	
* Certification must be submitted		3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
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 _____		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product			

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	Title: Agent	Telephone No. (Include Area Code): 202-393-3903 x19	
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		
4. Typed Name Georgia Anastasiou	5. Date February 26, 2013		

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

Caution. Causes eye and skin irritation. Avoid contact with eyes, skin and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or the toilet.

ENVIRONMENTAL HAZARDS

(If container size is 5 gallons or greater add the statement below)
Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, 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/CHEMICAL HAZARDS

Strong oxidizing agent. Mix only with water.

FreshProtect
For Use In Controlling [Spoilage Microorganisms]
[*Penicillium digatatum*] [(Green Mold)]
on Post-Harvest Citrus

Directions for Use
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

FreshProtect is a new generation hydrogen peroxide formulation that is specially designed to control bacterial and fungal spoilage microorganisms [*Penicillium digatatum*] (green mold) on citrus. FreshProtect provides superior control of [spoilage microorganisms] [*Penicillium digatatum*] (green mold) enhancing shelf life.

NOTE: FreshProtect compatibility with all citrus crops and varieties has not been determined. Therefore, prior to commercial use, it is important to test the compatibility of FreshProtect with the fresh target crop.

Active Ingredients

Hydrogen Peroxide.....	5.00%
Monopotassium salt of Phosphorous acid.....	10.56%
Other Ingredients	84.44%
Total	100.00%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15 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 ON SKIN OR ON CLOTHING: 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Net Contents:
EPA Reg. No. 86381-2 EPA Est. No. 60156-IL-1
Pimi Agro CleanTech, Ltd.
269 South Beverly Drive, Suite 1091
Beverly Hills, CA 90212
(310) 435-7988

FreshProtect is a concentrated solution that must be diluted prior to use.

Use Instructions For Controlling Spoilage Microorganisms

1. Dilute FreshProtect with water from 1:7 to 1:14 according to the variety of the citrus fruit, ripening level and orchard condition.
2. FreshProtect can be applied at several locations on the packing line by spraying or dipping or by a spray-dip sequence.
3. FreshProtect can be applied through recirculation and once-through treatment systems. When applying FreshProtect in a recirculation system, it is important to monitor the concentration of hydrogen peroxide in the system. Once the level of hydrogen peroxide is set by the supplier and it declines by 0.1% from the set level, add fresh use-solution of FreshProtect to the system.
4. Rinse and clean the dipping tank on a regular basis of at least two weeks and according to the tank condition.
5. You may follow FreshProtect treatment with the use of a systemic fungicide, such as thiabendazole and/or imazalil.

Storage and Disposal

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

Storage: Store in original plastic container at 4-35°C.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

[For plastic containers equal to or less than 50 lbs].

Container Handling: Nonrefillable containers. 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 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. 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.

[For plastic containers more than 50 lbs].

Container Handling: 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 1/4 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. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. 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.

Application Table for FreshProtect

Application Method	Dilution Rate	Temp.	Contact Time	Monitoring Requirements
Once-through systems	1:7 to 1:14	Ambient to 120°F	4-10 seconds	Measure temperature on line and hydrogen peroxide every 2 hours. Add fresh use-solution according to usage instructions. Refresh tank according to supplier recommendations.
Recirculating Spray	1:7 to 1:14	Ambient to 120°F	4-250 seconds	
Dip Tanks	1:7 to 1:14	Ambient to 120°F	15-150 seconds	

Use Instructions as Cleaning Agent prior to Imazalil and Thiabendazole Use as a Fungicide

1. Dilute FreshProtect with water from 1:10 to 1:20 according to the variety of the citrus fruit, ripening level and orchard condition.
2. FreshProtect as a cleaning agent can be applied at several locations on the packing line by spraying or dipping or by a spray-dip sequence.
3. FreshProtect as a cleaning agent can be applied through recirculation and once-through treatment systems. When applying FreshProtect in a recirculating system, it is important to monitor the concentration of hydrogen peroxide in the system. Once the level of hydrogen peroxide is set by the supplier and it declines by 0.1% from the set level, add fresh use-solution of FreshProtect to the system.
4. Wash thoroughly with clean tap water in the end of pre-cleaning process.
5. Rinse and clean the dipping tank on a regular basis of at least two weeks and according to the tank condition.
6. For optimized shelf-life after cleaning with FreshProtect it is recommended that cleaning be followed by treatment with with a systemic registered fungicide, such as thiabendazole and/or imazalil.