

228-305

3/6/2014

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

SAFETY
PREVENTION

OFFICE OF CHEMICAL
AND POLLUTION

MAR - 6 2014

George Meindl
Nufarm America's Inc.
11901 South Austin Ave
Alsip, IL 60803

Subject: Notification per PR Notice 2007-4 –Storage and Disposal Statement for
“residential” and “commercial” product labeling
Dissolve Granular Weed Killer
Application Dated – February 5, 2014
EPA Reg. No. 228-305
Decision No. 487729

Dear Mr. Meindl:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 for the subject product.

The Registration Division (RD) has conducted a review of this request for its applicability under PRN 2007-4 and finds that the action requested falls within the scope of both PRN 2007-4. The label submitted with the application has been date-stamped “Notification” and will be placed in our records.

If you have any questions regarding this letter, please feel free to contact Shanta Adeb at (703) 347-0502 or adeeb.shanta@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague".

Kathryn Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 228-305	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dissolve Granular Weed Killer	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas, Inc. 11901 South Austin Avenue Alsip, IL 60803 <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 _____	

NOTIFICATION

MAR 06 2014

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. This notification is consistent with the guidance in PR Notice 2007-4 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 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.

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	Metal Plastic Glass Paper Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
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 George Meindl george.meindl@us.nufarm.com	Title Sr. Regulatory Affairs Manager	Telephone No. (Include Area Code) 702.377.1423
2. Signature George Meindl <small>Digitally signed by George Meindl DN: cn=George Meindl, o=Nufarm, ou=emil-george.meindl@us.nufarm.com, c=US Date: 2014.01.28 15:48:12 -0500</small>		3. Title Sr. Regulatory Affairs Manager
4. Typed Name George Meindl		5. Date 2/5/2014
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)



Nufarm Americas Inc.
George Meindl
Sr. Regulatory Affairs Manager
11901 South Austin Avenue
Alsip, IL 60803
Phone: 708.377.1423 Fax: 708.377.1425
george.meindl@us.nufarm.com

February 5, 2014

Via Overnight Courier

Kathryn Montague (PM-23)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Dissolve Granular Weed Killer
EPA Reg. No. 228-305
Label Notification per PRN 2007-4

Dear Ms. Montague:

Nufarm Americas Inc. would like to add language to the subject product's labeling. The proposed language is consistent with PR Notice 2007-4. Please note there is a "residential" version and a "commercial" version of this product's labeling. We have updated the container disposal section within the storage and disposal box for both versions. In addition, with this label submission we have updated the subject product's labeling to our current address.

To process this request please find enclosed the following:

- Application for Pesticide Registration (EPA form 8570-1)
- Revised labeling with areas of change clearly identified (1 copy)
- Revised labeling – clean (1 copy)

If you should have any questions regarding this matter, please feel free to contact me at 708.377.1423 or email at george.meindl@us.nufarm.com.

Sincerely,

George Meindl
Sr. Regulatory Affairs Manager
Nufarm Americas Inc.

Clean 4/9

Commercial

DISSOLVE[®] GRANULAR WEED KILLER

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE WHICH
CONTROLS A WIDE SPECTRUM OF BROADLEAF WEEDS.

Weeds contacted by this product gradually die and disappear from the lawn.

Treats (or covers) 5,000 Sq. Ft. (50' x 100')

GET THE OPTICAL ADVATAGE[®]

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	0.700%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**‡	0.182%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***‡	0.179%
OTHER INGREDIENTS:	98.939%
..... TOTAL	100.000%

ISOMER SPECIFIC AOAC METHOD, EQUIVALENT TO:

*2,4-Dichlorophenoxyacetic Acid	0.58%, 0.0058 ae/lb
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.15%, 0.0015 ae/lb
***(+)-R-2-(2,4-Dichlorophenoxy)propionic Acid	0.15%, 0.0015 ae/lb

‡CONTAINS THE SINGLE ISOMER FORM OF MECOPROP -p and 2,4-DP-p

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

NOTIFICATION

MAR 06 2014

EPA REG. NO. 228-305
EPA EST. NO. 228-IL-1

MANUFACTURED BY
NUFARM AMERICAS INC.
11901 South Austin Avenue
Alsip, IL 60803



NET WEIGHT LBS.

5/9

Commercial

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

Harmful if absorbed through skin and inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Avoid breathing dust.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

All mixers, loaders, applicators, and other handlers must wear:

- long-sleeved shirt and long pants,
- shoes plus socks, and
- chemical-resistant gloves made of any waterproof material.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users Should:

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water.

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.

FIRST AID	
IF ON SKIN OR CLOTHING	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
IF INHALED	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth- to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
IF IN EYES	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 treatment 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 the 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 1-877-325-1840 for emergency medical treatment information.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. READ ENTIRE LABEL BEFORE USING THIS PRODUCT. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

Do not enter or allow people (or pets) to enter the treated area until dusts have settled.

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.

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

This product is a stable mixture of three herbicides. It is for use on Ornamental Turf Lawns (Residential, Industrial and Institutional), Parks, Cemeteries, Athletic Fields and Golf Courses (Fairways, Aprons, Tees and Roughs) and similar turf areas.

Commercial

This product may be used on Bahia, common Bermuda, Bluegrass, Centipede, Fescue, Rye, St. Augustine, and Zoysia grass. DO NOT USE on Dichondra and Carpet grass. DO NOT USE this product where desirable clovers are present or allow the product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

This product is designed to promote lush green growth in lawns and to control such broadleaf weeds as:

- | | | | |
|----------------------|--------------------|---------------------|----------------------------|
| Alder, | Dogfennel, | Nettle, | Spurge, |
| Artichoke, | Elderberry, | Nutgrass, | Spurweed, |
| Aster, | English daisy, | Orange hawkweed, | Stinkweed, |
| Austrian fieldcress, | Flea bane | Oxalis, | Stitchwort, |
| Beggartick, | (daisy), | Parsnip, | Sumac, |
| Biden, | Flixweed, | Pennycress, | Sunflower, |
| Bindweed, | Florida pusley, | Pennywort, | Sweet clover, |
| Bitterweed, | Frenchweed, | Peppergrass, | Tarweed, |
| Bitter winter cress, | Galinsoga, | Pepperweed, | Thistle, |
| Black medic, | Goatsbeard, | Pigweed, | Toadflax, |
| Blessed thistle, | Goldenrod, | Plantain, | Tumbleweed, |
| Blue lettuce, | Ground ivy, | Poison hemlock, | Velvet leaf, |
| Box elder, | Gumweed, | Poison ivy, | Veronica, |
| Broomweed, | Hawkweed, | Poison oak, | Vervain, |
| Buckhorn, | Healall, | Pokeweed, | Vetch, |
| Bull thistle, | Heartloaf drymary, | Poorjoe, | Virginia buttonweed, |
| Burdock, | Hemp, | Povertyweed, | Virginia creeper, |
| Bur ragweed, | Henbit, | Prickly lettuce, | Wild aster, |
| Buttercup, | Hoary cress, | Primrose, | Wild carrot, |
| Canada thistle, | Honeysuckle, | Puncture vine, | Wild garlic, |
| Carpetweed, | Horsetail, | Purslane, | Wild geranium, |
| Catnip, | Indiana mallow, | Ragweed, | Wild lettuce, |
| Chickweed, | Ironweed, | Red clover, | Wild onion, |
| Chicory, | Jewelweed, | Red sorrel, | Wild radish, |
| Clover, | Jimsonweed, | Rush, | Wild rape, |
| Cockle, | Kochia, | Russian thistle, | Wild strawberry, |
| Cocklebur, | Knotweed, | St. Johnswort, | Wild sweet potato, |
| Coffeebean, | Lambsquarter, | Sheep sorrel, | Willow, |
| Coffeeweed, | Locoweed, | Shepherdspurse, | Witchweed, |
| Common sowthistle, | Lupine, | Smartweed, | Woodsorrel, |
| Creeping jenny, | Mallow, | Sneezeweed, | Wormseed, |
| Croton, | Marshelder, | Southern wild rose, | Yarrow, |
| Curly indigo, | Mexicanweed, | Sowthistle, | Yellow rocket, |
| Dandelion, | Morningglory, | Spanish-needle, | and other broadleaf weeds. |
| Dock, | Musk thistle, | Spatterdock, | |
| Dogbane, | Mustard, | Speedwell, | |

WHEN TO APPLY: Best results are obtained when weeds are growing actively in Spring or early Fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers; especially when applying with a rotary (spinner) type spreader. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. For optimum results (1) Avoid mowing 1 to 2 days before and after application; (2) Apply when grass is moist (after a rain, sprinkling or dew); (3) Avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material; and (4) Avoid applying if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

NOTE: When applying to Southern Grasses - under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration on Centipede and St. Augustine grasses. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid possible dehydration or browning of grass.

HOW TO APPLY: This 20 pound bag should be used on 5,000 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is equal to one application.

The following settings are approximate for applying contents of this package at a suggested rate of 4 pounds per 1,000 square feet. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 sq. ft. and adjust to apply at the rate of 1 lb. per 250 sq. ft.

Use Precautions for Turf, ornamental (golf courses, cemeteries, parks, sports fields, turfgrass, lawns and other grass areas)

Postemergence:

Limited to 2 applications per year. A minimum 30-day retreatment interval is required. Maximum of 250 pounds of product /acre per application.

The maximum seasonal rate is 500 pounds of product/acre, excluding spot treatments.

**SPREADER SETTINGS
ONE PASS APPLICATION***

MAKE	SETTING
Central Calibrated	5
Cyclone Broadcast	3-3/4
Jackson	5
Sears Broadcast	3
Sears	5
Scotts Calibrated	4

(Grasscycling Logo) Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:

Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will produce smaller grass clippings that will decompose more readily so nutrients go back into your lawn.

- A 50' x 50' lawn produces enough oxygen for a family of 4 every day
- Reduces Glare & Reduces Noise
- Traps Dust, Smoke Particles & Other Pollutants
- Purifies Water & Modifies Temperature
- Improves Soil Condition & Controls Erosion

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. Do not stack more than two pallets high. Do not store near open containers of fertilizer, seed or other pesticides.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. If container is damaged or if pesticide has leaked, clean up all spilled material. Improper disposal of excess pesticide, spray mixtures or rinsate is a violation of Federal law and may contaminate groundwater. 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.

[For nonrefillable bags of granular or dry formulation]

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment, then offer for recycling if available, or dispose of empty bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

or

[Solid dilutable formulations in nonrefillable plastic containers]

CONTAINER DISPOSAL: Nonrefillable Containers 5 Gallons or Less: 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 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 or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration, or, if allowed by State and local authorities, by burning. If burned stay out of smoke.

CONTAINER DISPOSAL: Nonrefillable containers larger than 5 Gallons: Nonrefillable container. Do not reuse or refill this container. **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

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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 or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration, or, if allowed by State and local authorities, by burning. If burned stay out of smoke.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV020514)

Dissolve and The Optical Advantage are registered trademarks of Nufarm Americas Inc.

OPTIONAL SPREADER INSTRUCTIONS:

(Illustration) For Drop Spreaders: First apply two strips at ends. Then apply product along the length of the lawn, overlapping very slightly and shutting off spreader when turning.

(Illustration) For Rotary Spreaders: Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly.

OPTIONAL MARKETING STATEMENTS:

Contains Dissolve® A Premium Broadleaf Herbicide

The following note will not be part of the actual label copy.

*NOTE: Spreader Settings will vary among various commercial manufacturers.