



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 26 2004

Christopher Davis
FMC Corporation
1735 Market Street
Philadelphia, Pennsylvania 19103

Subject: Label Amendment- Add New Sites, Pests, and Update Labeling

Lawn Insect Control
EPA Reg. No. 279-3240

Your Submission Dated April 24, 2004

Dear Mr. Davis:

The amendment referred to above, submitted in connection with registration under section 3 (c) (7) (A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c) (5) or 4(a) when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a) Delete marketing claims that imply protection will extend for an indefinite period: *long lasting, one application controls insects for the entire season / season long control, apply once for season long control*. These statements are in conflict with the repeat instructions and "when to apply" directions.
 - b) Delete "*kills on contact*" claims. These claims are misleading since the product must be watered in for effective control.

- c) Delete the “*up to 3 months* residual control” claims throughout the label. This generic claim is in conflict with application instructions (i.e., retreat as necessary, repeat application no more than once per seven days, every two weeks, etc.) and is not supported by data/registered products cited to support this amendment. The data referenced indicated residual claims were variable at different rates and depended on specific pests tested.
- d) Under spreader tips you provide 1, 2, and 4 lbs of product/1000 sq. ft. settings but do not identify, other than mole crickets, what pests are controlled at these rates. Under *How to Use* and *How to Apply* identify the pests controlled at these rates. Refer to the label for 279-3173 for guidance.
- e) Separate home vegetable garden application rate instructions from ornamentals and flowers, and revise application rate according to cited labels. Either specify one application at a maximum rate of 1 lb product over a 500 sq.ft. area (Reg. No. 279-3173), or specify application rates and restrictions associated with the respective food uses as listed for the cited product under Reg. No. 279-3244. What does the 0.5 lb rate refer to? It does not appear under spreader tips.
- f) The additional brand name cannot be accepted under this amendment application. Since the name is intended for a distributor company, you must submit an application for supplemental distributor. This also applies to the other additional brand names listed.
- g) Delete the bullets “*soil penetrating formula, dual action technology/formula, fourth generation pyrethroid.*” False or misleading statements concerning the composition of the product or value of the product for purposes other than as a pesticide are not acceptable. We regret this was overlooked in our last label review.
- h) Delete the words/phrases “*insect free, exceptional/great value.*” False or misleading statements concerning the effectiveness or value of the product for purposes other than as a pesticide are not acceptable.
- i) Delete Pillbugs since the application rate required for control is 9.6 lbs product per 1000 sq. ft. (0.4 lb ai/acre). The maximum application rate for outdoor broadcast use on lawns is 0.2 lb ai/acre.
- j) Delete tomatoes and artichokes from the table on page 9. These crops are not listed on the cited labels.
- k) Based on the acute toxicity profile of this product, the only First aid statements needed are the “If on skin or clothing statements”. You may keep the other statements, but the If on skin or clothing statements should be listed first.

- 1) Revise the Precautionary statements to read: *"Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse."*
3. Submit two (2) copies of the final printed labeling before you release the product for shipment.

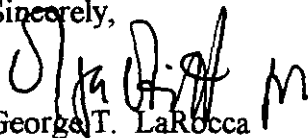
If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

In the future do not list the ingredient statement and precautionary statements for each Option label. Otherwise they will be considered as applications for new registrations. If you want to modify the use directions for sub labeling purposes or for use by distributors, then the labeling submitted should be identified as the "Master label."

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,



George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

Lawn Insect Control

[FRONT]

ABN: ORTHO® Ready-To-Use Lawn Insect Control Granules
 Scotts® Lawn Insect Control
 Scotts® Lawn Insect Control with Bifenthrin
 Scotts® Lawn Insect Control with Talstar
 ORTHO® Bug B Gon Max

CLAIMS:

- Insect Control with Bifenthrin
- Insect Control with Talstar
- Insect Protection
- Lawn Insect Protection
- Treats 5000 Square Feet for insect control
- Kills Insects, Fleas & Ticks
- Ortho's patented technology
- Treats up to 5,000 Square Feet for insect control
- Specially formulated for lawns
- Protects against listed damaging insects
- Low odor formula
- Fast Acting against insects, spiders and ticks
- Easy-to-use granules
- Ready-to-spread granules
- Easy to apply
- Fire Ant Killer
- Kills fire ants fast.
- Kills mole crickets
- Kills most outdoor pests in lawns and around homes
- Broad spectrum
- Multi-Purpose Insect killer
- Kills pests on contact
- Not harmful to lawn grasses
- Kills insects that cause your lawn to thin and turn brown

ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 NOV. 26, 2004
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
279-3240

- Kills lawn-damaging insects that cause your lawn to thin and turn brown
- Kills fleas and ticks
- Kills ticks that may transmit Lyme Disease
- Corrects most lawn insect problems (for grub control, use Scotts® GrubEx®)
- Controls many lawn insect problems
- Apply at first signs of insect damage or activity
- Corrects many lawn insect problems
- Controls chinch bugs, sod webworms (lawn moth), fleas, ticks (including ticks that may transmit Lyme's Disease), and other lawn pests listed on the back
- Soil Penetrating Formula
- Dual Action Technology/Formula
- Fourth Generation Pyrethroid
- A 10 lb bag treats up to 10,000 sq.ft.
- Treats up to 10,000 sq.ft. - 100%/twice more than 5,000 sq.ft. bags (for 10# bag)
- 2 X More Coverage* - *vs. Standard 5,000 sq. ft. Bags.
- Treats up to 20,000 sq.ft. - 100%/twice more than 10,000 sq.ft. bags (for 20# bag)
- Kills [insects/pests] above and/& below the [lawn] surface
- Kills insects in/& under the lawn
- Guaranteed kill or your money back

For Residential Lawn Use Only

[Insert photo/illustrations]

Active Ingredient

Bifenthrin	0.115%
Other Ingredients	99.885%
	100.00%

Cis isomers 97% minimum, trans isomers 3% maximum.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back of bag.

OR

See (back panel booklet, back panel) for additional precautionary statements.

NET WT 10.00 lb / 4.54 kg

[**SATISFACTION GUARANTEED OR YOUR MONEY BACK]

**OPTION IA. Directions for Use for the ORTHO Group of
The Scotts Company (Lawn Use Only)**

[Optional text]

[ORTHO®

LAWN INSECT CONTROL GRANULES is a high-performance product and
is:]

- [Virtually Odor-free]
- [Fast Acting]
- [Easy-To-Use]
- [Not harmful to grasses]

DIRECTIONS FOR USE

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

Do apply when insect activity or damage is first observed in the
lawn (lawn thins and turns brown or moths fly from the grass when
you mow).

Don't treat just the browned area of lawn. To prevent further
damage, treat entire lawn.

Retreat as necessary. Repeat application is necessary only if
there are signs of renewed insect activity. Repeat application
should be limited to not more than once per seven days.

In New York State, this product may NOT be applied to any grass
or turf area (lawns) within 100 feet of a water body (lake, pond,
river, stream, wetland, or drainage ditch).

In New York State, do make a single repeat application of this
product if there are signs of renewed insect activity, but not
sooner than two weeks after the first application.

PRODUCT FACTS	
SURFACE FEEDING LAWN INSECTS	<ul style="list-style-type: none"> • Use ORTHO® LAWN INSECT KILLER READY-TO-USE GRANULES for the control of: Ants (including Carpenter, Red Harvester, Pavement, Odorous, Pyramid, Argentine, Pharoah, Fire Ants and Foraging Fire Ants), Armyworms, Billbugs, Centipedes, Chinch Bugs, Crickets, Cutworms, Earwigs, European Crane Fly, Fleas, Grasshoppers, Leaf Hoppers, Mealybugs, Millipedes, Mole Crickets, Sod Webworms (Lawn Moth), Spiders, Ticks (including ticks that may transmit Lyme Disease), and Weevils (including Hyperodes).
HOW TO USE	<p><u>Insects :</u></p> <ul style="list-style-type: none"> • Uniformly apply 1 to 2 pounds over a 1,000 sq. ft. area of lawn using a any hand or power operated gravity or rotary type spreader designed for the application of granular materials. • A 10 pound bag will treat a 5,000 sq. ft. to 10,000 sq. ft. area of lawn. [A 20 pound bag will treat a 10,000 sq. ft. to 20,000 sq. ft. area of lawn.] • Best results are obtained if the treated area is thoroughly watered immediately after application. <p><u>For Mole Crickets :</u></p> <ul style="list-style-type: none"> • Uniformly apply 2 to 4 pounds over a 1,000 sq. ft. area of lawn. For best results, treat in late spring and water thoroughly immediately after application. <p><u>For Fire Ant Mounds :</u></p> <ul style="list-style-type: none"> • Uniformly apply 1 tablespoon or 3 teaspoons** of granules to the surface of each mound. For best results : 1) apply in cool weather, 65 to 80 F, in early morning or late evening hours 2) Avoid disturbing ants 3) treat new mounds as they appear 4) thoroughly water the treated area after application.

**** Food utensils such as tablespoons/teaspoons must not be used for food purposes after use in measuring pesticides.**

SPREADER TIPS			
For best results, use a Scotts® spreader			
SPREADER	Spreader Settings covers 5,000 sq. ft		
	Pounds of product per 1,000 sq.ft.		
	11b	21b	41b
Scotts Drop Spreader	??	??	??
			Mow lawn first if grass is tall enough to touch the bottom of the spreader. First apply two header strips. Operate spreader the longest way of the lawn. Overlap wheel marks to ensure uniform feeding. Shut off spreader when you have reached the header strips or stopped.
Scotts Easy Green® Rotary	??	??	??
			Side shut-off lever to the right; application automatically starts and stops when you do. For complete coverage make each pass about 30 inches from the previous one, so some overlapping occurs.
Scotts SpeedyGreen® Or EdgeGuard® Rotary	??	??	??
			Shut off spreader anytime you stop. For complete coverage make each pass about five feet from the previous one, so some overlapping occurs. Avoid applying this product on flower, vegetable and shrub plantings.

When using other spreaders, calibrate the spreader settings based on the manufacturer's recommendations.

9/18

-----Option 1B-----
**OPTION 1B. Directions for Use for the ORTHO Group of
The Scotts Company (Use on Lawns, Home Foundations/
Perimeter Treatment, Ornamental and Flower Gardens,
Vegetable Gardens)**

- o Kills in 24 hours
- o Kills overnight
- o Kills over 50 insects
- o Kills [insects] on contact
- o Exceptional/Great Value
- o Use on residential lawns, home perimeters, ornamental & flower gardens, and vegetables
- o Use on lawns, [ornamentals, vegetables] [&] as a barrier treatment around home foundations
- o Kills [nuisance] pests/insects around home foundations
- o Use around outside of homes, porches and/& patios
- o One application kills/controls for up to 3 months
- o Long lasting! [Up to] 3 month control
- o Up to 3 month control [Guaranteed]
- o Insect free for [up to] 3 months. [Guaranteed!]
- o Kills insects on contact [and keeps on killing] for [up to] 3 months
- o Kills above and below the surface for [up to] 3 months
- o Kills and/& prevents/protects for [up to] 3 months
- o Keeps [on] killing for [up to] 3 months
- o One Application controls insects/bugs/pests for the entire season
- o One application provides season long control
- o One application....season long control
- o Apply once for season long control
- o Season Long Control
- o Fast Acting
- o Easy-To-Use
- o For use on lawns, ornamentals, home perimeter/foundation, vegetables, and flower beds/gardens
- o Kills chinch bugs, mole crickets, cutworms, billbugs, European crane fly, [and other listed lawn damaging/destroying] insects/pests [on contact]

**For Residential Lawn, Home Perimeter, Ornamental & Flower Garden,
and Home Garden Use Only**

Active Ingredient

10/18

Bifenthrin	0.115%
Other Ingredients	99.885%
	<u>100.00%</u>

Cis isomers 97% minimum, trans isomers 3% maximum.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back of bag.

OR

See (back panel booklet, back panel) for additional precautionary statements.

[Optional text]

[**ORTHO® Bug B Gon® MAX™** is a high-performance product and is:]

- [Virtually Odor-free]
- [Fast Acting]
- [Easy-To-Use]
- [Not harmful to grasses]

DIRECTIONS FOR USE

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

In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a water body (lake, pond, river, stream, wetland, drainage ditch). In New York State, do make a single repeat application of this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

PRODUCT FACTS
INSECTS CONTROLLED
Use Ortho Bug B Gon® MAX™ to kill and control:
<ul style="list-style-type: none">• Fire Ants, Centipedes, Chiggers, Fleas, Spiders, and Ticks (including ticks that may transmit Lyme Disease).
Use Ortho Bug B Gon® MAX™ to kill and provide residual control of:
<ul style="list-style-type: none">• Ants (including Carpenter, Red Harvester, Pavement, Odorous, Pyramid, Argentine, Pharaoh, Black Turf), Armyworms (including Lawn Armyworm, Fall Armyworm), Billbugs (including Bluegrass Billbug, Hunting Billbug), Black Turfgrass Ataenius adults, Bristletail, Chinch Bugs, Crickets, Cutworms (including Black Cutworm, Bronzed Cutworm, Granulate Cutworm, Variegated Cutworm), Dichondra flea beetle, Earwigs, European Crane Fly, Fiery Skipper,

Firebrat, Frit fly, Grasshoppers, Greenbug, Ground Beetles, Ground pearl, Leafhoppers, Lucerne moth, Mealybugs, Millipedes, Mole Crickets (including Tawny Mole Cricket, Southern Mole Cricket, Short-winged Mole Cricket), Pillbugs, Seed Maggots, Webworms (including Sod Webworm, Grass Webworm, Tropical Sod Webworm), Springtails, Striped grassworm, Two-lined spittle bugs, Weevils (including Hyperodes and Bluegrass) and Wireworms.

- For grub control, apply Scotts® GrubEx® Season-Long Grub Control anytime from late-April to mid-August.

WHERE TO APPLY

Lawns.
Around Home Foundations (Perimeter Treatment).
Ornamental and Flower Gardens.
Vegetable Gardens.

WHEN TO APPLY

- Apply early/proactively [in the Spring/Summer/Fall] to prevent infestation. Otherwise, apply at the first sign of insect activity or damage.

HOW TO APPLY

For best results, treated area should be thoroughly watered immediately after application.

On Lawns

- Using a spreader designed for application of granular materials, uniformly apply 1 to 2 lbs over 1000 sq.ft.
- For mole cricket control, apply 2 to 4 lbs over 1000 sq.ft. area.
- For 3 month/season long control, apply 4lbs of product for every 1000 sq.ft.
- A 10 (20) pound bag will treat up to 10,000 (20,000) sq. ft. area of lawn.

On Ornamentals, Flowers & Vegetable Gardens

- Apply 0.5 to 1 lb. evenly over each 500 sq. ft. area. Repeat if there are signs of renewed insect activity.
- Product can be applied just before planting or after plants emerge.

Home Foundation/Barrier Treatment

Evenly apply a 2 foot wide band next to the house/home foundation. Use 0.5 to 1.0 lb for each 500 sq. ft. (2 ft. x 250 ft.).

**** Food utensils such as tablespoons/teaspoons must not be used for food purposes after use in measuring pesticides.**

12/18

Bug B Gon® MAX™ can be applied to the vegetables listed below

CROP	DAYS TO WAIT TO HARVEST
Tomatoes, sweet corn	1
Green peas, sugar snap peas, snow peas, green beans (wax beans, snap beans), dry beans (black-eyed peas, cow pea), cucumber, gourds, muskmelon, pumpkin, squash, and watermelon	3
Artichoke	5
Broccoli, Chinese broccoli, cabbage, cauliflower, kohlrabi, Chinese mustard, eggplant, head lettuce, peppers (bell and non-bell)	7

SPREADER TIPS

For best results, use a Scotts® spreader

SPREADER	Spreader Settings Pounds of product/1,000 sq. ft.			Directions
	1 lb.	2 lbs.	4lbs.	
Scotts Drop Spreader	xxx	xxx	xxx	Mow lawn first if grass is tall enough to touch the bottom of the spreader. First apply two header strips. Operate spreader the longest way of the lawn. Overlap wheel marks to ensure uniform coverage. Shut off spreader when you have reached the header strips or stopped.
Scotts EasyGreen® Rotary	xxx	xxx	xxx	Side shut-off lever to the right; application automatically starts and stops when you do. For complete coverage make each pass about 30 inches from the previous one, so some overlapping occurs.

Scotts SpeedyGreen® Or Edgeguard® Rotary	XXX	XX	XXX	Shut off spreader anytime you stop. For complete coverage make each pass about five feet from the previous one, so some overlapping occurs.
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-----END OF OPTION I-----

**OPTION II. Directions for Use for the Consumer Lawns
Business Group of The Scotts Company.**

[BOTTOM FRONT]

Treats XXXX Square Feet

[Above will be inverted on back of bag]

Scotts® Lawn Insect Control (XXXX - stock number)

[LEFT GUSSET]

[UPC Code] Treats Scotts® Lawn Insect Control (XXXX -
 stock number)
 XX,XXX Square Feet

[RIGHT GUSSET]

[UPC Code] Treats Scotts® Lawn Insect Control (XXXX
 - stock number)
 XX,XXX Square Feet

[BACK PANEL]

[DIAGONAL LINE - SCISSORS ART]

-----CUT HERE TO OPEN-----

Optional Back Panel Claims

Kills lawn-damaging insects, spiders, fleas and ticks. For grub control, apply Scotts® GrubEx® season-long grub control anytime from late-April to mid-August.

OR

Insect Control - controls chinch bugs, sod webworms (lawn moths) and other lawn insects. For grub control, apply Scotts® GrubEx® anytime from late-April to mid-August.

OR

Lawn Insect Control is a high-performance product and is:

- Virtually Odor-free
- Fast Acting
- Easy-to-Use
- Broad Spectrum
- Effective in killing Insects, Spiders, Fleas, and Ticks

What to Expect

Lawn Insect Control kills these lawn pests:

Ants (carpenter, red harvester, pavement, odorous, pyramid, argentine, and pharaoh

Armyworms	Foraging Fire Ants
Centipedes	Sod Webworms (lawn moth)
Chinch Bugs	Spiders
Crickets	Ticks (including Ticks that transmit Lyme Disease)
Cutworms	Weevils (including Hyperodes)
Earwigs	Billbugs
Fleas	European Crane Fly
Grasshoppers	Leaf Hoppers
Millipedes	Mealybugs
Mole Crickets	
Fire Ants	

KEY PRODUCT FACTS**How and When to Apply****Directions for Use**

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

- Apply product to the entire lawn when insect activity or damage is first observed.
- Spread uniformly over your lawn using the suggested spreader settings. For best results, use a Scotts spreader.
- Water-in product after application.

- Do not use any other weed, disease, or insect control products for at least one week after application.
- For grub control, apply Scotts® GrubEx® between late April and mid-August.
- In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).
- In New York State, do make a single repeat application of this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Spreading Tips

Apply header strips. Then apply product in longest direction of lawn.
For best results, use a Scotts® spreader.

Spreader Settings

	Covers XX,XXX sq. ft.	Directions
Scotts® strips; Drop overlapping Spreaders	XXX	Mow lawn first; apply 2 header apply longest direction of lawn, wheel marks.
Scotts® from EasyGreen® width. Rotary	XXX	Make each pass about 30 inches previous pass to overlap spread
Scotts® from previous SpeedyGreen® Rotary	XXX	Make each pass about 5 feet pass to overlap spread width.

Additional Spreader Settings

EZ Drop, Republic (#530).....XX

EZ Broadcast, Republic (#540).....XX

(Non-Scotts spreader settings are approximate. You may need to adjust for proper coverage.)

[Illustrations: spreading patterns]

When using other spreaders, calibrate the spreader settings based on the manufacturer's recommendations.

-----END OF OPTION II-----

STORAGE AND DISPOSAL

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

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. For rigid containers after partial use replace lids and close tightly. For bags after partial use, reseal opened bag by folding top down and securing.

Pesticide Container Disposal:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans (and Domestic Animals)

Caution

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

FIRST AID:

If swallowed: Call A poison control center 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or 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.

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. 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.

HOTLINE NUMBER

Have the product container or label with you when calling poison control center or doctor, or going for treatment. You may also contact 1-800-225-2883 for emergency assistance.

Note to Physician:

This product is a pyrethroid. If large amounts have been ingested, the milk, cream or other digestible fats and oils may increase absorption and so should be avoided.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

U.S. Patent No. 4,238,505

18/18

OPTION I. (The ORTHO Group)

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

[phone icon] **Questions, Comments or Medical Information**
call 1-800-225-2883 www.ortho.com

****THE ORTHO GUARANTEE**

If you are not satisfied with the results after using this product, return the original proof-of-purchase and original receipt to your ORTHO Dealer or send to: The ORTHO Group, Consumer Affairs Dept., P.O. Box 1749, Columbus, OH 43216.

-----END OF OPTION I-----

OPTION II. The Consumer Lawns Group

[Phone Art]

Questions/Information

Consumer Helpline:
1-800-543-TURF (8873)

[Computer Art]

Visit our website:
www.scottslawn.com

Scotts No-Quibble Guarantee®:
number)

(XXXX - stock

If for any reason you are not satisfied with results after using this product, you are entitled to get your money back. Simply send us evidence of purchase and we will mail you a refund check promptly.

Product of U.S.A.

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[UPC Code]

[BOTTOM BACK]