

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

MAY 27 2011

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Natalie A. Gaydos, Sr. EHS Specialist PPG Industries 4325 Rosanna Drive Allison Park, PA. 15101

Subject:

PPG Chlorinating Pellets

EPA Registration Number 748-297 Application Date: May 12, 2011 Receipt Date: May 16, 2011

Dear Ms. Gaydos:

This acknowledges receipt of your Notification submitted in accordance with the provisions of PR Notice 98-10 under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)9.

Proposed Notification

• Addition of optional marketing statements: "For Domestic Use" and "Not for Export".

General Comments

Based on a review of the material submitted, the notification is acceptable.

Should you have any questions or comments concerning this letter, please contact Tom Luminello at (703) 308-8075.

Sincerely,

Wanda Y. Henson

Acting Product Manager 32

Regulatory Management Branch II Antimicrobials Division (7510P)

ĢEPA	s on reve	Environmei Wa	shington, DC 20	0460	ency		Registra Amendn Other	tion	OPP Identifier Number	
			Application	on for P	esticide – Se	ction	1			
1. Company/Product Number 748-297				2. EPA Product Manager Wanda Henson				1 _	Proposed Classification None Restricted	
4. Company/Produc PPG Industrie	ting Pellet	ts PM# 32					Mone Mestilicieu			
5. Name And Address Of Applicant (Include ZIP Code) PPG Industries, Inc. 4325 Rosanna Drive Pittsburgh, PA 15101 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					
				Sec	tion II					
Amendment – Resubmission Notification – E		Final Printed labels in response to Agency letter dated "Me Too" Application. Other – Explain Below.								
Notification of lab notification is con made to the labeli willfully make an	oel charsistent of the second contract of the	ne confidential states statement to EPA. I	llowing optio of PR Notice ment of formu further under	nal marke 98-10 an ıla of this stand that	eting claims: "For d EPA regulation product. I unders if this notification	s at 40 stand t on is n	OCFR 152.4 that it is a voot consister	46, and no iolation of with the	for Export". This o other changes have been of 18 U.S.C. Sec. 1001 to e terms of PR Notice 98-10 penalties under sections	
				Sec	tion III	······································				
1. Material This Prod	luct Will	Be Packaged In:								
Child Resistant Pac Yes* No * Certification in be submitted- 425# not CR EPA has data of	kaging m ust	Unit Packaging Yes No If "Yes" Unit Packaging wgt. 0.5# 3.5# 5# 10#	No. per Container 2 9 6	Water Soluble Packaging Yes No If "Yes" No. per Unit Packaging wgt. Container				2. Type of Container Metal Plastic Glass Paper Other (Specify) _Fiberboard box,		
		25#	2							
3. Location of Net Contents Information 4. Size(S) F				Retail Container 5. 35,40,50, 100#				Location of Label Directions On Label On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product Lithogra Paper Stencil				glued Other						
		· · · · · · · · · · · · · · · · · · ·		Sec	tion IV					
1. Contact Point (Co	mplete it	tems directly below for	identification o	f individual	to be contacted, if	necess	ary, to proce	ss this app	olication.)	
Name				1				Telephon	ne No. (Include Area Code)	
Natalie A. Gaydos				Sr. EHS Specialist 412-4					92-5536	
				ation and all attachments thereto are true, accurate and complete. statement may be punishable by fine or imprisonment or					6. Dute Application Received	
2. Signature (Laylos)				3. Title Sr. EHS Specialist						
4. Typed Name				5. Date						
Natalie A. Gaydos				May 12, 2011						



PPG Industries

PPG Industries, Inc. 4325 Rosanna Drive Allison Park, PA 15101 USA

Natalie A. Gaydos Sr. EHS Specialist Product Stewardship Environment, Health & Safety Phone: 1-412-492-5536 Fax: 1-412-492-5484 E-mail: gaydos@ppg.com

May 12, 2011

Ms. Wanda Henson - Product Manager 32 Document Processing Desk Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202

> RE: PPG Chlorinating Pellets, EPA Reg. No. 748-297 Notification of Label Update per PR Notice 98-10

Dear Ms. Henson:

Attached is a request for a label update for EPA Reg. No. 748-297, PPG Chlorinating Pellets. For your reference, I have also attached a document with the changes noted in red. We would like to add two optional marketing claims to the label:

- 1. For Domestic Use
- 2. Not for Export

No other label changes were made.

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.

If you have any questions, please call.

Very truly yours,

Natalie A. Gaydos

Attachments

PPG CHLORINATING PELLETS

Calcium Hypochlorite Mixture - Pellet Form

EPA Reg. No. 748-297 EPA Est. No. 58401-IL-1

KEEP OUT OF REACH OF CHILDREN DANGER

Do not mix with any other chemicals, including any other pool chemicals of any kind.

Mixing with other chemicals could cause a fire or explosion.

Always add product to large quantities of water to fully dissolve product.

Do not pour water into product, always add product to water

See additional precautionary statements on back label.

FIRST AID: If in eyes, hold eye open and rinse slowly and gently with water for 15-20 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 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 swallowed, call 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. 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. Note to Physician, probable mucosal damage may contraindicate the use of gastric lavage.

Contact 1-412-434-4515 or your poison control center for 24-hour emergency medical treatment information. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Manufactured by PPG INDUSTRIES, INC. One PPG Place Pittsburgh, PA 15272 Emergency Telephone Number: 1-412-434-4515

NET WT. XXX lbs. (XXX Kgs.)

Pellet Weight: x grams [NOTE TO EPA - The pellet weight statement is optional.]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER - Highly Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or going to the toilet. Remove and wash contaminated clothing and shoes before reuse. May be fatal if swallowed. Irritating to nose and throat. Avoid breathing dust.

[NOTE TO EPA: The following statement will appear on package sizes 50 lbs or larger:] **ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. 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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

[NOTE TO EPA: The following statement will appear on package sizes less than 50 lbs:] **ENVIRONMENTAL**. **HAZARDS:** This pesticide is toxic to fish and aquatic organisms

PHYSICAL AND CHEMICAL HAZARDS: Strong oxidizing agent! Mix only with water. Do not mix this product with any other chemicals, including any other pool chemicals of any kind, such as other disinfection or "shock" pool products. Always add product to large quantities of water to dissolve product. Do not pour water into product. [The following statement shall not be used on small, single use packages: Use only a clean, dry utensil made of metal or plastic each time product is taken from the container.] Do not add this product to any dispensing device containing remnants of any other product or pool chemical. Such use may cause violent reaction leading to fire or explosion. Contamination with moisture, acids, organic matter, other chemicals (including, but not limited to cleaning chemicals and other pool chemicals), petroleum or paint products or other easily combustible materials may start a chemical reaction with generation of heat, liberation of hazardous gases and possible violent reaction leading to fire or explosion. If product becomes contaminated or decomposes do not reseal container. If possible isolate container in open air or well-ventilated area. Flood with large volumes of water, if necessary, to fully dissolve product.

[NOTE TO EPA: The following Optional Marketing Claims and Symbols may be added to the product label:]

Water treating agent
Bactericide
Algaecide
Controls odor
Kills Iron bacteria
Oxidizes iron for easier removal
Reduces H₂S odor
Reduces Hydrogen Sulfide odor
Stop! Do not mix with other products or pre-dissolve before use
For Domestic Use
Not for Export



Directions for Use

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

Potable Water Applications

These pellets are to be used in pellet dispenser for automatically treating well water in those areas where treated water supplies are not available.

This product is intended to be used for treating water by placing the pellets at the base of a well to sanitize until consumed. It is not intended to replace safe and properly constructed wells. EPA recommends for human consumption 0.2-0.8 ppm to be determined by using a test kit provided with the pellet dispenser. One pellet normally treats 29 gallons of average well water. These pellets are designed to dissolve in less than 1 hour. Consult the manufacturer's installation and adjustments so that the required chlorine residual can be maintained at all times.

Public Wells - Before using, flush the casing with a 50 ppm available chlorine solution [1 ounce (35 pellets) of calcium hypochlorite for each 100 gallons of water]. The solution should be fed by gravity into the well and thoroughly mixed and agitated. The well should stand overnight or for twelve hours under chlorination. It may then be pumped until bacterial examination of a representative raw water sample will indicate whether further treatment is necessary.

After the initial treatment, begin feeding a 1% available chlorine solution of this product with a hypochlorinator, as directed above, until a free available chlorine residual of at least 0.2 ppm and no more than 0.6 ppm is attained throughout the distribution system. Check the water frequently with a chlorine test kit. Bacteriological sampling must be conducted at a frequency no less than that prescribed by the National Primary Drinking Water Regulations. Contact your local Health Department for further details.

Shock Chlorination of Wells and Storage Tanks

To produce 50 ppm available chlorine solution use one ounce (36 pellets) calcium hypochlorite for each 100 gallons of water. Refer to following to determine Well Capacity (Gallons per linear ft.)

Diameter of Well	Gal. per linear ft.	Cont. diameter of Well	Cont. Gal. per linear ft.
1-1/4"	.1	13"	6.9
2"	.2	14"	8.0
3"	.4	16".	10.5
4"	.7	18"	13.2
5"	1.1	20"	16.3
6"	1.5	24"	23.5
8"	2.6	30"	36.7
10"	4.1	36"	52.9

SEWAGE & WASTEWATER EFFLUENT TREATMENT:

The disinfection of sewage effluent must be evaluated by determining the total number of coliform bacteria and/or fecal coliform bacteria, as determined by the Most Probable Number (MPN) procedure, to ensure that chlorinated effluent has been reduced to or below the maximum permitted by the controlling regulatory jurisdiction.

On the average, satisfactory disinfection of secondary waste water effluent can be obtained when the chlorine residual is 0.5 ppm after 15 minutes contact. Although the chlorine residual is the critical factor in disinfection, the importance of correlating chlorine residual with bacterial kill must be emphasized. The MPN of the effluent, which is directly related to the water quality standards requirements, should be the final and primary standard and the chlorine residual should be considered an operating standard valid only to the extent verified by the coliform quality of the effluent.

The following are critical factors affecting waste water disinfection:

- 1. Mixing: It is imperative that the product and the waste water be instantaneously and completely flash mixed to assure reaction with every chemically active soluble and particulate component of the waste water.
- 2. Contacting: Upon flash mixing, the flow through the system must be maintained.
- 3. Dosage/Residual Control: Successful disinfection is extremely dependent on response to fluctuating chlorine demand to maintain a predetermined, desirable chlorine level. Secondary effluent should contain 0.2 to 1.0 ppm chlorine residual after a 15 to 30 minute contact time. A reasonable average of residual chlorine is 0.5 ppm after 15 minutes contact time.

Effluent slime control: Apply a 100 to 1000 ppm available chlorine solution at a location which will allow complete mixing. Prepare this solution by mixing 2 to 20 oz. of this product with 100 gallons of water. Once control is evident, apply a 15 ppm available chlorine solution. Prepare this solution by mixing 0.3 oz. of this product with 100 gallons of water.

Filter Beds – Slime Control: Remove the filter from service, drain it to a depth of 1 foot above the filter sand, and add 16 ounces of this product per 20 square feet evenly over the surface. Wait 30 minutes before draining water to a level that is even with the top of the filter. Wait for 4 to 6 hours before completely draining and backwashing the filter.

DISINFECTION OF DRINKING WATER (POTABLE WATER)

PUBLIC WATER SYSTEMS

Public Systems: Mix a ratio of 1 ounce of this product to 6000 gallons of water. Begin feeding this solution with a hypochlorinator until a free available chlorine residual of at least 0.2 ppm and no more than 0.6 ppm is attained throughout the distribution system. Check water frequently with a chlorine test kit. Bacteriological sampling must be conducted at a frequency no less than that prescribed by the National Primary Drinking Water Regulations. Contact your local Health Department for further details.

New Tanks, Basins, etc.: Remove all physical soil from surfaces. Place 4 ounces of this product for each 5 cubic feet of working capacity (500 ppm available chlorine). Fill to working capacity and allow to stand for at least 4 hours. Drain and flush with potable water and return to service.

New Filter Sand: Apply 16 ounces of this product for each 150 to 200 cubic feet of sand. The action of the product dissolving as the water passes through the bed will aid in sanitizing the new sand.

Mains: Thoroughly flush section to be sanitized by discharging from hydrants. Permit a water flow of at least 2.5 feet per minute to continue under pressure while injecting this product by means of a hypochlorinator. Stop water flow when a chlorine residual test of 50 ppm is obtained at the low pressure end of the new main section after a 24 hour retention time. When chlorination is completed, the system must be flushed free of all heavily chlorinated water.

New Wells: Flush the casing with a 50 ppm available chlorine solution of water containing 1 ounce of this product for each 100 gallons of water. The solution should be pumped or fed by gravity into the well after thorough mixing with agitation. The well should stand for several hours or overnight under chlorination. It may then be pumped until a representative raw water sample is obtained. Bacterial examination of the water will indicate whether further treatment is necessary.

Existing Equipment: Remove equipment from service, thoroughly clean surfaces of all physical soil. Sanitize by placing 4 ounces of this product for each 5 cubic feet capacity (approximately 500 ppm available chlorine). Fill to working capacity and let stand at least 4 hours. Drain and place in service. If

the previous treatment is not practical, surfaces may be sprayed with a solution containing 1 ounce of this product for each 5 gallons of water (approximately 1000 ppm available chlorine). After drying, flush with water and return to service.

Reservoirs/Algae control: Rapid algae growth in reservoirs is an indication of increased chlorine demand. When algae become a problem, special action is necessary. There are several methods of treatment. One of these is to hypochlorinate steams feeding the reservoir. Suitable feeding points must be selected on each stream at least 50 yards upstream from the point of entry into the reservoir. Continuous chlorination is usually effective in destroying algae where a sufficient amount of sanitizer is fed to produce a chlorine residual of 0.2 to 0.5 ppm free available chlorine. Where continuous feeding is not possible, scheduled, intermittent feeding should be practiced. In doing so, broadcast calcium hypochlorite evenly over the surface of the reservoir, taking special care to treat shallows and edges. As it descends, the product dissolves, distributing a chlorinating action to all depths. Introduce a sufficient amount of calcium hypochlorite to provide a residual of from 0.2 to 1.5 ppm for up to 24 hours.

INDIVIDUAL SYSTEMS:

Dug Wells: Upon completion of the casing (lining) wash the interior of the casing (lining) with a 100 ppm available chlorine solution using a stiff brush. This solution can be made by thoroughly mixing 1 ounce of this product into 40 gallons of water. After covering the well, pour the sanitizing solution into the well through both the pipe sleeve opening and the pipeline. Wash the exterior of the pump cylinder also with the sanitizing solution. Start pump and pump water until strong odor of chlorine in water is noted. Stop pump and wait at least 24 hours. After 24 hours flush well until all traces of chlorine have been removed from the water. Contact your local Health Department for further details.

Drilled, Driven & Bored Wells: Run pump until water is as free from turbidity as possible. Pour a 100 ppm available chlorine sanitizing solution into the well. This solution can be made by thoroughly mixing 1 ounce of this product into 40 gallons of water. Add 5 to 10 gallons of clean, chlorinated water to the well in order to force the sanitizer into the rock formation. Wash the exterior of pump cylinder with the sanitizer. Drop pipeline into well, start pump and pump water until strong odor of chlorine in water is noted. Stop pump and wait at least 24 hours. After 24 hours, flush well until all traces of chlorine have been removed from the water. Deep wells with high water levels may necessitate the use of special methods for introduction of the sanitizer into the well. Consult your local Health Department for further details.

After the initial treatment, feed calcium hypochlorite into the intake line of the well pump. This also helps keep any filters free of slime. Automatic hypochlorinating equipment for this purpose is readily available and easy to use. If it is not possible to locate a feed at the intake line, feed calcium hypochlorite anywhere in the well pump discharge line. Feed sufficient calcium hypochlorite to produce a free chlorine residual of at least 0.2 ppm and no more than 0.6 ppm after a 20-minute contact period. Regular testing is necessary and a record of test readings should be kept.

Flowing Artesian Wells: Artesian wells generally do not require disinfection. If analyses indicate persistent contamination, the well should be disinfected. Consult your local Health Department for further details. After initial treatment, follow the practice of maintaining a free chlorine residual of 0.2 ppm to 0.6 ppm in the water outlets after a minimum 20-minute contact period as directed previously.

EMERGENCY DISINFECTION:

When boiling of water for 1 minute is not practical, water can be made potable by using this product. Prior to addition of the sanitizer, remove all suspended material by filtration or by allowing it to settle to the bottom. Decant the clarified, contaminated water to a clean container and add 1 grain of this product to 1 gallon of water. One grain is approximately the size of the letter "O" in this sentence. Allow the treated water to stand for 30 minutes. Properly treated water should have a slight chlorine odor, if not.

repeat dosage and allow the water to stand an additional 15 minutes. The treated water can then be made palatable by pouring it between clean containers for several times.

Emergency Disinfection After Floods

Wells: Thoroughly flush contaminated casing with a 500 ppm available chlorine solution. Prepare this solution by mixing 1 ounce of this product with 10 gallons of water. Backwash the well to increase yield and reduce turbidity, adding sufficient chlorinating solution to the backwash to produce a 10 ppm available chlorine residual, as determined by a chlorine test kit. After the turbidity has been reduced and the casing has been treated, add sufficient chlorinating solution to produce a 50 ppm available chlorine residual. Agitate the well water for several hours and take a representative water sample. Re-treat well if water samples are biologically unacceptable.

Reservoirs: In case of contamination by overflowing streams, establish hypochlorinating stations upstream of the reservoir. Chlorinate the inlet water until the entire reservoir obtains a 0.2 ppm available chlorine residual, as determined by a suitable chlorine test kit. In case of contamination from surface drainage, apply sufficient product directly to the reservoir to obtain a 0.2 ppm available chlorine residual in all parts of the reservoir.

Basins, tanks, flumes, etc.: Thoroughly clean all equipment, then apply 4 ounces of product per 5 cubic feet of water to obtain 500 ppm available chlorine, as determined by a suitable test kit. After 24 hours, drain, flush, and return to service. If the previous method is not suitable, spray or flush the equipment with a solution containing 1 ounce of this product for each 5 gallons of water (1000 ppm available chlorine). Allow water to stand for 2 to 4 hours, then flush and return to service.

Filters: When the sand filter needs replacement, apply 16 ounces of this product for each 150 to 200 cubic feet of sand. When the filter is severely contaminated, additional product should be distributed over the surface at the rate of 16 ounces per 20 square feet. Water should stand at a depth of 1 foot above the surface of the filter bed for 4 to 24 hours. When filter beds can be backwashed of mud and silt, apply 16 ounces of this product per each 50 square feet, allowing the water to stand at a depth of 1 foot above the filter sand. After 30 minutes, drain water to the level of the filter. After 4 to 6 hours, drain and proceed with normal backwashing.

Distribution system: Flush repaired or replaced section with water. Establish a hypochlorinating station and apply sufficient product until a consistent available chlorine residual of at least 10 ppm remains after a 24-hour retention time. Use a chlorine test kit.

Emergency Disinfection After Fires

Cross connections or emergency connections: Hypochlorination or gravity feed equipment must be set up near the intake of the untreated water supply. Apply sufficient product to give a chlorine residual of at least 0.1 to 0.2 ppm at the point where the untreated supply enters the regular distribution system. Use a chlorine test kit.

Emergency Disinfection After Droughts

Supplementary water supplies: Gravity or mechanical hypochlorite feeders must be set up on a supplementary line to dose the water to a minimum chlorine residual of 0.2 ppm after a 20-minute contact time. Use a chlorine test kit.

Water shipped in by tanks, tank cars, trucks, etc.: Thoroughly clean all containers and equipment. Spray a 500 ppm available chlorine solution and rinse with potable water after 5 minutes. This solution is made by mixing 1 ounce of this product for each 5 gallons of water. During the filling of the containers, dose with sufficient amounts of this product to provide at least a 0.2 ppm chlorine residual. Use a chlorine test kit.

Emergency Disinfection After Main Breaks

Mains: Before assembly of the repaired section, flush out mud and soil. Permit a water flow of at least 2.5 feet per minute to continue under pressure while injecting this product by means of a hypochlorinator. Stop water flow when a chlorine residual test of 50 ppm is obtained at the low-pressure end of the new main section after a 24-hour retention time. When chlorination is completed, the system must be flushed free of all heavily chlorinated water.

For a complete copy of the master label for this product, contact PPG or review the most current EPA stamped-accepted label available at www.epa.gov/pesticides/pestlabels.

STORAGE AND DISPOSAL:

Do not contaminate food or feed by storage, disposal, or cleaning of equipment.

Pesticide Storage

Keep this product dry in a tightly closed container when not in use. Store in a cool, dry, well ventilated area away from heat or open flame. In case of decomposition, isolate container (if possible) and flood area with large amounts of water to dissolve all materials before discarding this container.

Pesticide Disposal

Pesticide wastes may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. 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.

Container Handling

Nonrefillable container. Do not reuse or refill this container. Triple rinse or pressure 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 ¼ 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 place in trash collection.

LIMITED WARRANTY: The Manufacturer warrants, for a period of 1 year from purchase, that when this Product is stored and used, all in accordance with label directions, it will be fit for its intended purpose. THE MANUFACTURER EXPRESSLY DISCLAIMS ALL OTHER EXPRESS OR IMPLIED WARRANTIES. TO THE EXTENT THIS DISCLAIMER IS PROHIBITED BY APPLICABLE LAW, ANY IMPLIED WARRANTIES ON THIS PRODUCT ARE LIMITED IN DURATION TO THE DURATION OF THIS WARRANTY. If this Product fails to conform to this Limited Warranty, the Manufacturer will refund your purchase price or furnish you with replacement product, at Manufacturer's option. This is the Manufacturer's sole liability and in no event will Manufacturer be liable for direct, indirect, special, incidental or consequential damages. To make a claim under this Limited Warranty, contact the store/dealership where you purchased this Product. This Limited Warranty gives you specific legal rights, and you may also have other legal rights which vary from state to state.