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

October 16, 1997

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R. Franklin Handy Technical Director Drexel Chemical Company P.O. Box 13327 Memphis, T.N. 38113-0327

Dear Dr. Handy:

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Subject: IDA Seis-Tres 6-3 Insecticide (EPA Reg. No. 19713-324)

The Agency has reviewed your submission for a revised Confidential Statement of Formula, and the following comment applies:

The Confidential Statement of Formula dated July 17, 1997, for the IDA Seis-Tres 6-3 Insecticide formulation agrees with the label claim in compliance with PR Notice 91-2 and is acceptable.

The Confidential Statement of Formula has been added to your file as part of the record.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

1) Switch the position of the box that cotains the "PRECAUTIONARY STATEMENTS" text with the box that contains the "STATEMENT OF PRACTICAL TREATMENT" text.

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- 2) In the Statement of Practical Treatment section amend "If Breathing Has Stopped:...sees victim" to "IF INHALED: Remove victim to firesh air. If not breathing, immediately give artificial respiration, preferably mouth-to-mouth, and maintain until doctor sees victim. If breathing is difficult, give oxygen."
- 3) In the Statement of Practical Treatment section amend "In Case of Contact:...See doctor immediately." to "IF IN EYES OR ON SKIN: Immediately flush with plenty of water while removing contaminated personal clothing and shoes to avoid continued possible exposure to victim or persons in attendance."
- 4) The last two paragraphs under the "User Safety Recommendations" which includes "Repeated exposures...regarding such blood tests" must be moved to the first paragraph of the "Precautionary Statements" section which begins with "Danger: Poisonous if swallowed...".
- 5) On page 3 of your label under "Agricultural Use Requirements (Continued) amend "chemical-resistant footwear," to state "chemical-resistant footwear plus socks,"

A stamped copy of the label is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

Sincerely yours,

Lawrence Fried Biologist Insecticide-Rodenticide Branch Registration Division (7505C)

Enclosure



ACTIVE INGREDIENT:

Parathion*[0,0-diethyl 0-(4-nitrophenyl) phosphorothioate]	55.92%
Related compounds	1.77%
Methyl parathion*[0,0-dimethyl 0-(4-nitrophenyl)	
phosphorothioate]	27.59%
Related Compounds	1.08%
INERT INGREDIENT:	13.64%
TOTAL:	0.00%

This product contains 6 lbs. of parathion and related compounds and 3.0 lbs. of methyl parathion and related compounds per gallon.

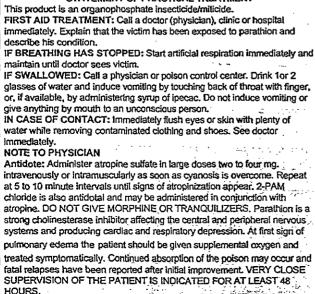
REEP OUT OF REACH OF CHILDREN Print DANGER PELIGRO POISON VENENO

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

Read Entire Label Before Using This Product SHAKE WELL BEFORE USING

EPA Reg. No. 19713-324 EPA Est. No. 19713-MS-1

STATEMENT OF PRACTICAL TREATMENT



SPECIAL INSTRUCTIONS FOR RESTRICTED USE PESTICIDES RETAILERS

In addition to any other required records, restricted use pesticide retailers must record at the time of sale the unique container identification number on this label or container and the identity of the purchaser of the container.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals DANGER: Poisonous if swallowed, inhaled, or absorbed through skin or eyes. Rapidly absorbed through skin. Do not breathe vapors. Do not get in eyes or on skin or clothing. CAN KILL IF SWALLOWED: This product can kill you if swallowed. Even in small amounts, spray mist may be fatal if swallowed. CAN KILL BY SKIN CONTACT: This product can kill you if touched by hands or spilled or splashed on skin, in eyes or on clothing (liquid goes through clothes). CAN KILL IF BREATHED: This product can kill you if vapors or spray mist are breathed. PERSONAL PROTECTIVE EQUIPMENT Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category G on an EPA chemical resistance category selection chart. Applicators (pilots in enclosed cockpits) must wear: Long-sleeved shirt and long pants and shoes plus socks. In addition, pilots must wear chemical-resistant gloves such as barrier laminate or viton, when entering or leaving an aircraft contaminated with pesticide residues. If taken into the cockpit, the gloves must be kept in an enclosed container to prevent contamination of the inside of the cockpit. Mixers and Loaders (who must use the closed system described elsewhere on this label) must wear: Coveralls over long-sleeved shirt and long pants, chemical resistant gloves such as barrier laminate or viton, chemical resistant footwear plus socks, chemical-resistant apron when cleaning equipment, mixing, or loading and protective eyewear, if the closed system is pressurized. All other handlers, including persons who (1) repair, clean, or maintain the parts of mixing, loading, or application equipment that may contain residues, (2) clean up spills, (3) handle open containers, or (4) dispose of this pesticide, must wear: Chemical-resistant protective suit, chemical resistant gloves, such as barrier laminate or viton, chemicalresistant footwear plus socks, protective eyewear, chemical-resistant headgear for overhead exposure, a respirator with either an organic vapor

removing cartridge with a prefilter approved for pesticides (MSHAMOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHAMIOSH approval number prefix T(-14(-). (



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Users must: Provide mechanical exhaust ventilation, if product is handled indoors. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them Clean respirators and replace cartidges or canisters according to instructions included with the respirators. Replace gloves frequently. Keep and wash PPE (coveralls, gloves, footwear, aprons, protective eyewear, etc.) separately from all other laundry. Wash PPE after each day's use, following the manufacturer's directions. If no such instructions, use detergent and hot water. Store PPE separately from personal ciciting. Keep personal work clothing (long-sleeved shirts, long pants, and sucks) worn while performing mixing, loading, application, and other handling and early entry tasks separate from household articles.

USER SAFETY RECOMMENDATIONS

Users should: Not rub eyes or mouth with hands.

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STOP work and get help right away if you feel sick in any way. See First Aid (Practical Treatment) section of this label. Call a doctor (physician), clinic, or hospital immediately. Explain that the victim has been exceed to parathion and describe his condition. After first aid is given (See First Aid Treatment Section) and if a doctor cannot come, take victim to clinic or hospital.

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

Remove clothing immediately if pesticide gets inside. Then wash toroughly and put on clean clothing. Remove PPE, all work clothing, and foctive immediately after handling this product. Wash the outside of gloves with scap and water before removing. Shower using scap and water. Wear only clean clothing when leaving job-do not wear contaminated clothing. The National Pesticide Telecommunication Network (NPTN) is available for

recommendations regarding poisoning management, emergency reatment, and other information regarding the toxicity of parathion. The toil-tee number for NPTN is 1-800-858-7378.

Repeated exposures to cholinesterase inhibitors such as are contained in this product may, without warning, cause prolonged susceptibility $\underline{\mathbf{n}}$ very small doses of any cholinesterase inhibitor.

Persons working with this product should have frequent blood tests of their cholinesterase levels. If the cholinesterase level falls below a critical point, no further exposure should be allowed until it has been determined by means of blood tests that the cholinesterase level has returned to normal. Before using this product, consult the Agricultural Extension Service or "Experimental Station for specific recommendations regarding such blood tests."

POISON SIGNS (Symptoms)

Parathion is a very dangerous poison. It rapidly enters the body on contact with all skin surfaces and eyes. Clothing wet with this material must be removed immediately. Exposed persons must receive prompt medical treatment or they may die.

Some of the signs and symptoms of poisoning are: Headache, nausea, vomiting, cramps, weakness, blurred vision, pin-point pupils, tightress in chest, labored breathing, nervousness, sweating, watering of eyes crooking or frothing of mouth and nose, muscle spasms and coma.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish, aquatic invertebrates, and wildlife. Birds in treated area may be killed. Shrimp and other aquatic organisms may be killed at recommended application rates. For terrestrial uses, do not apply directly to water, to areas where the surface water is present, or to intertidal areas below the mean high water mark. Runoff and drift from target areas maybe hazardous to aquatic organisms in adjacent aquatic sites. Do not contaminate water when disposing of equipment washwaters. This product is estemply toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

APPLICATION RESTRICTIONS

Aerial Application Only: Ethyl parathion may only be applied aetaly, and only by a certified commercial applicator as defined in FIFRA 2(e); HUMAN FLAGGERS ARE STRICTLY PROHIBITED DURING AERIAL AFFLICA TION.

No Spray or Drift On Any Person: Do not apply this product in a way that will contact any person, either directly or through drift. During application keep ALL persons out of (1) the treated area plus any area within 100 feet of the treated area, and (2) any additional area where there is a danger of drift. Keep all livestock and pets away from treated area and where there is danger of drift.

Areas Where Application is Prohibited: Do not apply this product within 100 feet of buildings, public roads, or bodies of water. Do not apply within 100 feet of property lines, unless the owner of the adjacent property has given prior written consent to the application and has been informed of the timing of the application and the appropriate entry restrictions. Crop Limitations: This product must not be applied to any crop other than alfalia, barley, com, cotton, sorghum, soybeans, and wheat. Any treated crop must be harvested only by mechanical means. Hand harvesting of treated crop is prohibited.

Chemigation Prohibited: Do not apply this product through any type of irrigation system.

Drift Reduction Measures: Do not apply this product if the wind exceeds 10 miles per hour. Apply only from nozzles located not more than 75% of the distance from the center of the aircraft to the wing tip or helicopter rotor tip.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions pertaining to the restrictedentry intervals, and notification to workers. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS).

IMPORTANT: The exceptions in the WPS pertaining to personal protective equipment, restricted-entry intervals, and notification to workers do NOT apply when this product is used.

Restrictions on Entry to Treated Areas: Do not enter or allow any person to enter into entry-restricted areas (treated areas plus areas within 100 feet of treated areas) during the restricted entry interval (REI) of 3 days (6 days for com) and during any longer period of time prescribed by state law or regulation. Entry into entry-restricted areas (including early entry that would otherwise be permitted under the WPS) by any person is PROHIBITED, except for persons who are (1) handlers performing crop-advisor tasks or (2) workers performing irrigation-related tasks.

Restrictions for All Persons Who Enter Entry-Restricted: When any person enters the treated areas or within 100 feet of the treated area before the expiration of REI all of the following requirements must be complied with:

- No entry is permitted, except for persons who are performing crop-advisor tasks or irrigation-related tasks,
- No person is allowed to enter or remain in entry-restricted areas during application and until four (4) hours after application is complete,
- No person is allowed to remain in any entry-restricted area for a total of more than one (1) hour in any 24-hour period,
- Each person must wear the personal protective equipment specified for early entry on this label.
- 5) Each person must be provided the protections in the WPS and in this labeling. If the two requirements are not identical, the requirements that are the most restrictive must befollowed.
- Each person, except owners of the farm and members of their immediate family, must have received training as follows:
- (a) Currently certified as an applicator of restricted-use pesticides, OR
 (b) Currently trained as a handler under the requirements of the WPS, OR
- (c) Currently trained as a worker under the requirements of the WPS and, in addition, is informed, (i) how to put on, use, and take off PPE correctly, (ii) about the importance of washing thoroughly after removing PPE, and (iii) how to prevent, recognize, and give correct first aid for heat illness.
- 7) Before entering the entry-restricted area, each person must have read the product fabeling or been informed in a manner the person can understand of all the labeling requirements related to safe use of the pesticide, including signal word, human hazard precautions, first aid instructions, symptoms of poisoning, and personal protective equipment requirements for early entry.
- Appropriate measures to prevent heat illness must be taken for each person.
- 9) Each person must be provided a decontamination site that is reasonably accessible and is within 1/4 mile of that person. (Exception: if the site where the person is working is more than 1/4 mile from the nearest point reachable by vehicle, the decontamination site may be at the access point.) Each decontamination site must contain an adequate supply of soap and single-use towels and an adequate amount of water for routine washing, emergency eye, flushing, and emergency whole body washing. The water must be of a quality and temperature that will not cause illness or injury when it contacts the skin or eyes or if it is svalk/ved/5 The site must also contain a clean change of clothing, such as a coveralk e
- 10) Each person must carry an eye-flush dispenser containing at feast one pint of water that meets the quality and tamperature criteria listed for decontamination water in (9) above.
- 12) Each person must wash thoroughly after removing PRS
 13) Personal protective equipment wom during early entry must of be wom home. No person other than owners of the farm and members of their immediate family, may take home— before it is cleaned— PPE wom during early entry.

AGRICULTURAL USE REQUIREMENTS (CONTINUED)

Personal Protective Equipment for Early Entry: PPE required for early entry to treated areas that is permitted on this label is: Coveralls over long-sleeved shirt and long pants, chemical-resistant gloves such as bartier laminate or viton, chemical-resistant footwear, protective eyewear and chemical-resistant headgear for overhead exposure. Notification About Application And Entry Restrictions: Notify workers (other than workers who are members of the farm owners' immediate family) of the application by warning them orally if they will be within ¼ mile of the treated area. In addition, treated areas must be posted with WPS signs at (or 100 feet outside) all usual points of entry or at (100 feet outside) all the corners of the treated areas affording maximum visibility.

NOTIFICATION TO FARM OWNER/OPERATOR

A certified commercial applicator must not apply this parathion product on a farm until he or she makes sure the owner of the farm (or person responsible for managing the farm) has the following information in writing: (1) specific location and description of the area to be treated, (2) time and date of application, (3) product name, EPA registration number, and active ingredients, (4) the entry restrictions including the restricted-entry interval, (5) the requirement for both oral warnings to workers and posting of treated areas, (6) the requirement that crops treated with parathion be harvested mechanically and the prohibition on hand harvesting, (7) the incident reporting requirements set forth on this label, and (8) any other labeling requirements concerning the protection of workers or other persons during or after application. This requirement is satisfied if the owner / operator of the farm has a copy of this labeling.

PROTECTION OF APPLICATORS AND MIXER/LOADERS Applicator Protection: The cockpit of the aircraft used to apply this

product must be fully enclosed while this product is being applied. No pilot may apply this product if the pilot has earlier during the day of application performed any mixing/loading activities (other than acting as an observer) involving any pesticide product containing parathion. Human flaggers are prohibited.

Mixer/Loader Protection: An observer must be present during all mixing/ loading activitles in order to furnish assistance in the event of an accident. The observer must not act as a mixer/loader and need not wear personal protective equipment.

This product must be mixed and loaded in a closed system, as described below:

The liquid pesticide must be removed from its original shipping container and transferred through connecting hoses, pipes, and/or couplings that are sufficiently tight to prevent handlers or other persons from contacting the parathion concentrate, use dilution, or rinsate solution. A complete seal by dry break or screw-on coupling to the opening of the original container shall be required.

All hoses, piping, tanks, and connections used in the system shall be of a type appropriate for the product being used and the pressure and vacuum levels involved. The system shall be designed and operated so that the concentrated form of this product is not under more than 25 psi of pressure at any point in the system beyond or downstream from a pump producing positive pressure. The closed system must be adequate to make necessary measurements of the product being used. External sight gauges shall be equipped with valves so that the flow of pesticide to the sight gauge can be shut off in case of breakage or leakage from the gauge. Dry-break coupling shall be used for all hose connections that may be disconnected during normal mixing-loading operations (excluding periodic maintainenance). A coupling shall be considered to be a dry-break coupling only if its manufacturer certifies that less than 2ml of liquid escape per disconnect.

In mixing/loading operations do not pour this product from its container. Before opening the container, make sure that the container is resting securely on the ground or a sturdy support, with the top (opening) end up and approximately level.

Remove the product from the container only by use of a vacuum-producing pump system connected to a probe system that is listed by the State of California under that State's program establishing criteria for closedsystem handling of Toxicity Category I pesticides. Examples of California listed systems are the Chemprobe(R) Model II system sold by Cherlor Mfg. Co., Inc., P.O. Box 2174, Salinas, CA 93902, telephone 408-422-5477 or the Protect-O-Loader Model XM-1 system sold by Protecto Mfg. Co., 20189 Firerock Road, Bend, OR 97701; telephone 503-382-6886. The probe system shall be screwed into the threaded opening in the top of the container to form a watertight connection, using appropriate adapters provided by the probe manufacturer as necessary. The instructions provided by the seller of the probe system shall be followed, except that a removable probe may not be removed from the container until the container is empty and the container and probe have been thoroughly rinsed as required by this section.

The closed-system must provide for adequate rinsing of any removable probe and of all containers that are not labeled for return to the registrant. Rinsing must be done using a liquid that contains no pesticide. The rinsing system must be capable of spray-rinsing the inner surface of the container. The rinse solution shall be removed from the pesticide container concurrent with the introduction of the rinse medium. The rinse solution shall go into pesticide mix tank or applicator vehicle via the closed system. The system shall be rinsed according to the specifications of the manufacturer of the probe system, or, in the absence of such specifications, by moving at least one half of the container volume through the system. A minimum pressure of 15 psi shall be used for the spray rinse. Parathion containers shall be protected against excessive pressure during the container rinse operation. Measures shall be taken to prevent the spray rinse procedure from causing an increase in pressure on the inside of the container walls of more than 5 psi. Either the operator of the closed system must have available at the time of operation a complete set of written instructions for proper operation of the system, or the certified applicator must document in writing before an operator uses the closed system that the operator has been adequately trained in the proper operation of the system.

INCIDENT REPORTING

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A telephone notification must be made if mixing, loading, or use of a product containing parathion results in inadvertent or unexpected human exposure to the product or illness resulting from exposure to the product, spill of the product, an investigation by federal, state or local authorities of allegations involving drift of the product, or the deaths of blrds or other wildlife. The certified applicator or the owner of the treated land must notify by telephone the Chief, Compliance Branch, Office of Compliance Monitoring, U.S. EPA, at 202-260-3375 within seven days of becoming aware of the incident. GENERAL INFORMATION

Aircraft should apply the recommended amount of SEIS-TRES 6-3 in ½ to 3 gation of water per acre. Always use sufficient water for adequate coverage of the crop foliage.

Where a dosage range is given, use the lower rate on small or young plants or with light insect infestations. Use the higher rate on mature plants or with heavy insect infestation.

The amount given to use are the amounts of SEIS-TRES 6-3 to apply per acre per application. The hazards and precautions for handling SEIS-TRES 6-3 are equally applicable to it after dilution with water for spray application. ALFALFA: For control of Aphids, Alfalfa weevil larvae and Adult weevils, Alfalfa caterpillars, Armyworms (up to third instar), Climbing cutworms and Grasshoppers, use ¼ to ²/₃ pint per acre. For Webworms and Spider mites, use ½ pint per acre. For Tortricid moths and Clover leaf weevils, use ²/₄ pint per acre. Do not spray legumes during bloom period to avoid injury to honey bees. CA and NV regulations limit the use of this material to not more than ¹/₃ pint per acre. Do not apply within 15 days of harvest, cutting, or forage use. The restricted-entry interval is 3 days.

CORN (field, hybrid, sweet and pop): For control of Roatworm (adults), use 'h pint per acre. For Aphids, Armyworms (up to third instar), Fall armyworms, Budworms, Spider mites and Climbing cutworms, use ½ pint per acre. For Stink bugs use ½ pint per acre. For European com borer control use ³/s pint per acre. Apply first spray when 75% of com plants show Shothole feeding and follow with two additional sprays at 5 to 7 day intervals. Use sufficient water per acre to provide complete coverage and be certain whorls of plants are well treated. Do not apply to com during the pollen shed period. Do not apply within 12 days of harvest, cutting, or forage use. The restricted-entry interval is 6 days.

COTTON: For control of Cotton leafworms, Fleahoppers, Lygus bugs, Red spider mites, Thrips and Garden webworms, use ½ pint per acre. For control of Cabbage loopers and Boll weevils, use ²/s to 1 '/s pint per acre. For Bollworms and Budworms, use 1 '/s pints per acre. For Aphids, Cotton leaf perforators, Armyworms (up to third instar), Stink bugs and Sattmarsh caterpillars, use 1 pint per acre. Application to cotton should be made at 4 to 5 day intervals until control is obtained. The restricted-entry interval is 3 days. Do not apply within 12 days of harvest.

SMALL GRAINS (wheat, barley): For control of Armyworms (up to third instar), Fall armyworms, Winter grain mites and Thrips, use ½ pint per acre. For Aphids (greenbugs) use ½ pint per acre. For Grasshoppers and Brown wheat mites, use ½ pint per acre. For Climbing cutworms, Leafhoppers and Say's plant bugs, use ½ to ½ pint per acre. For Chinch bugs and False chinch bugs, use 1 pint per acre. Do not apply within 15 days of harvest, cutling or forage use. The restricted-entry interval is 3 days.

SORGHUM: For control of Com earworms, Com leaf aphids, False chinch bugs and Sorghum webworms, use 1/a pint per acre. For Sorghum midges, use 1/a pint per acre. Leaf injury may occur on some hybrid varieties of

sorghum. Spray a few rows a week or so before booting to test effects upon plants. Do not apply within 12 days of harvest, cutting, or forage use. The restricted-entry interval is 3 days.

SOYBEANS: For control of Two-spotted mites, use ½ pint peracre. For Stink bugs, use ½ pint peracre. For Stink bugs, use ½ pint per acre. For Bollwoms, Fall armywoms, Green⁴ cloverworms, Velvet bean caterpillars and Webworms, use ¼ pint per acre. Do not apply more than 2 applications per glowing/season. Do not apply later than 30 days before harvest. The restricted entry interval is 3 days. •

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STORAGE AND DISPOSAL

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Do not contaminate water, food, or feed by storage or disposal. STORAGE: Store in a dry tocation away from children, animals, foods, feeds, seeds, and other agricultural chemicals. Keep container closed when not using. Do not allow water into container as this may cause deteritoration of product. Personnel must wear the personal protective equipment specified for "All Other Handlers" listed in the "Hazards to Humans" section of this label when handling open containers or cleaning up spills. Do not store under conditions where temperature may exceed 120°F or below 45°F. Keep storage area locked when not in use. In the event of spillage or leakage, soak up material with absorbent clay, sand, sawdust, or other absorbent materials while wearing appropriate protective equipment. Scrape up and dispose of in accordance with information given under "Pesticide Disposal" section. In case of fire or other emergency, report at once by toll-free telephone to 800-424-9300.

PESTICIDE DISPOSAL: Pesticide wastes are acutely 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 DISPOSAL (Returnable/Refillable Sealed Container): Do not break seals or add any material to the container. Do not rinse container or empty any residue from container. This container must be returned intact after use to the point of purchase.

WARRANTY - CONDITION OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

In no case shall Drexel or the Setter be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not In strict accordance with directions given herewith. The forgoing Is a condition of safe by Drexel Chemical Company and is accepted as such by the Buyer.