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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OCT 2 4 2005

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Vatren Jurin Manager Technical Services ClawEl Specialty Products 211 W. Route 125, P.O. Box 350 Pleasant Plains, IL 62677

Subject: Label Amendment: Adding pineapple (acceptable) and a marketing claims (unacceptable) SAF-T-Oil EPA Reg. No. 48813-1 Submission dated June 8, 2005

Dear Mr. Jurin:

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 comments:

The marketing statement you added to the label is unacceptable and must be removed from your label (cannot be added!). The statement declaring "Other Oils" as deficient is definitely unacceptable and your claim that your product is superior must be supported by data. Then, it may be acceptable to state that "Saf-T-Oil uniform coverage due to smaller droplets will reduce burn and stress to the plants".

A stamped copy "accepted with comments" of the label is enclosed for your records.

Please submit two (2) copies of the final printed label for our records. If you have any questions please call me at (703) 308-8328.

Sincerely, yours.

Akiva Abramovitch, Ph.D. Chemist Insecticide-Rodenticide Branch Registration Division (7505C)

MASTER LABEL

ACCEPTED with COMMENTS In EPA Letter Dated: OCT 2.4 2005 Under the Federal Insecticide Fungleiden, and Rodenticide Act. Ca amended, for the protectide registered under EPA heg. No.

Spray Oil Emulsion Fungicide, Insecticide and Miticide

Active Ingredient:	
Petroleum Oil	80.0%
Other Ingredients:	
Total:	

Sublabel A – Commercial/Agricultural Uses (Subject to the Worker Protection Standard)

Sublabel B – Non-Commercial/Residential Uses (Not Subject to the Worker Protection Standard)

EPA Reg. No. 48813-1

EPA Est. No. 48813-IL-1

Manufactured By:

[Space reserved for logo]

BRANDT CONSOLIDATED, INC.

P.O. Box 277 • Pleasant Plains, IL 62677 (217) 626-1031

USEPA MASTER LABEL - SAF T-OIL

SUBLABELIA = COMMERCIAL / AGRICULTURAL USE

[Space reserved for logo]

Other olls' larger droples can cause burn to the plant. Sate 1:011's smaller droplets provide uniform coverage with less burn or stress.

SAFTOIL

Spray Oil/Emulsion Fungicide, Insecticide and Miticide

Active Ingredient: Petroleum Oil Other/Ingredients: Total Total Unsulfonated Residue of Petroleum Oil 92.0% min

EPA Reg. No. 48813-1

FEPA Est. No. 48813-IL-1

NET CONTENTS: 2-5 Gallonsy/49:46 L (17.8 Lbs))

Manufactured By:

[Space reserved for logo] BRANDT CONSOLIDATED, INC. P.O. Box 277 SElector (Petrov II) (62677

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KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid breathing spray mists or vapors. Wash thoroughly with soap and water after handling. Avoid contamination of feed or foodstuffs.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

WPS USES: Handlers who may be exposed to the dilute through application or other tasks covered by the Worker Protection Standard (40 CFR Part 170) – in general, agricultural plant uses are covered – must wear: long-sleeved shirt and long pants, shoes plus socks and chemical resistant gloves (such as barrier laminate or nitrile rubber, neoprene rubber, or viton). Follow manufacturer's instructions for clean/maintaining PPE. If no such Instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

NON-WPS USES: Handlers who may be exposed to the dilute through application or other tasks NOT covered by the Worker Protection Standard (40 CFR Part 170) – in general, only agricultural plant uses are covered by the WPS – must wear: long-sleeved shirt and long pants, shoes plus socks and chemical resistant gloves (such as barrier laminate or nitrile rubber, neoprene rubber, or viton). After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes.

Apply this product only as specified on the label.

DIRECTIONS FOR USE

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

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

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 works on farms, forest, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry intervals. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 4 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: coveralls, chemical resistant gloves, and shoes plus socks.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries and greenhouses.

Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried.

GENERAL INFORMATION

This insecticide's mode of action is through suffocation of eggs, larvae and nymphs of Insects and mites and adults of soft-bodied insects. This mode of action necessitates total spray coverage. As a fungicide it interferes with the attachment of the pathogen to the host and acts as a suffocant. Use enough spray solution to completely penetrate the leaf canopy and cover both top and bottom of all of the leaves until wet without significant runoff. Most mature trees will require 20 to 500 gallons of spray solution per acre although citrus trees may require 15 to 1000 gallons of spray solution per acre. Row crops generally require 20 to 100 gallons of spray solution per acre. (Be sure to check with your equipment and local recommendations.)

SAF-T-OIL controls a wide range of mite and insect pests in the egg stage such as: spider and eriophyid mites, armored and soft scales, mealy bugs, psyllids, whitefiles, aphids, leafrollers, leaftiers, webworms, cankerworms, plant bugs, leafhoppers and adelgids. SAF-T-OIL will kill other immature forms if spray covers the insect.

USE PRECAUTIONS — All horticultural oils interfere with or slow plant transpiration and respiration during periods of evaporation. DO NOT apply during periods of drought or when plants exhibit moisture stress.

COMPATIBILITY — SAF-T-OIL is compatible with most commonly used insecticides and fungicides. Read and follow all precautions and limitations on labeling of all products used in tank mixtures. DO NOT use in combination with or immediately before or after spraying with fungicides such as captan, folpet, oxythiquinox (Morestan) or any product containing sulfur. Also do not use with Carbaryl (Sevin) or dimethoate (Cygon). Do not use with any product whose label recommends the use of no oils. Do not use in combination with NPK foliar fertilizer applications.

CHEMIGATION - Do not apply this product through any type of irrigation system.

TIMING THE TREATMENT — You must determine the precise timing to fit local growth and climatic conditions. This product can be applied up to day of harvest.

MIXING DIRECTIONS — Add sufficient water to the mixing tank to allow proper agitation. Add the correct amount of SAF-T-OIL to tank. Maintain agitation until solution is used. If other pesticides are to be added, do so after SAF-T-OIL has been thoroughly mixed.

RATE RECOMMENDATIONS

TREE CROPS

CROP	PEST	APPLICATION RATE Gallons of SAF-T-OIL per 100 Gallons of Water	TIME OF APPLICATION
Almond Apricot Cherry Plum Prune	Aphids Fruit Tree Leaf Roller Mites Scales Whitefiles	1-2 -	As Needed
Apple (all varieties)	Aphids Bugs (including Apple Red Bug) Fruit Tree Leaf Roller Mites (including European Red Mite) Powdery Mildew Scales (Hard, Soft, Scurfy) Whitefiles	1-2	As Needed
Avocado Banana Cocoa Coffee Macadamia Papaya	Bugs Leafhoppers Scales Sigatoka Leafrotler Thrips	1-2	As Needed
Citrus *	Blackfly Greasy Spot Mites Scales (Glover, Chaff, Purple, Yellow, Red, Snow, Brown and California) Sooty Mold Whitefiles	1-2	Fall Early Winter Post-bloom March-April

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Hops	Aphids Leaf Roller Mites Powdery Mildew Scales Whitefiles	1-2	As Needed
Nectarines Peach Pecan	Aphids Fruit Tree Leaf Roller Mites Scales Whitefiles	1-2	As Needed
Pear (all varieties)	Aphids Fruit Tree Leaf Roller Mites (including Pear leaf Blister Mite) Pear Psylla Powdery Mildew Scales Whitefiles	1-2	As Needed
Pineapple	Aphids Mealybugs Mites Scales	1-2	As Needed
Fig Kiwi Olive Pistachio Walnut **	Aphids Mites Scales	1-2	As Needed

* Citrus — Oils applied after October may increase cold damage to trees; applied in August and September may affect solids content, retard color.

** Walnut - Apply late spring to mid-summer only. Do not apply after husk split.

VEGETABLE AND FIELD CROPS

CROP	PEST	APPLICATION RATE Gallons of SAF-T-OIL Per 100 Gallons of Water	TIME OF APPLICATION
Asparagus Bean Cucumber Eggplant Melon Peanut Pepper Pumpkin Radish Squash Tomato	Aphids Beetle Iarvae Leafhoppers Leaf Miners Mites Thrips Whiteflies	1-2	As Needed
Cabbage Cauliflower Celery Cole Crops Lettuce Onion	Aphids Leafhopper Leaf Miners Loopers Mites Plant Bugs Thrips Whiteflies	1-2	As Needed

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Corn (Sweet, Field, Seed) Popcorn Sugar Beet	Aphids Leaf Miners Mites Whiteflies	1-2	As Needed
Cotton	Aphids Bollworm eggs and larvae Leafhoppers Loopers Mites Plant Bugs Thrips Whiteflies	1-2	As Needed
Grasses (Grown for Seed)	Mites Powdery Mildew Rust	1-2	As Needed
Potato Sweet Potato	Aphids Leaf Miners Mites Whiteflies	1-2	As Needed
Торассо	Leaf Miners Mites Whitefiles	1-2	As Needed

SMALL FRUITS

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CROP	PEST	APPLICATION RATE Galions of SAF-T-OIL Per 100 Galions of Water	TIME OF APPLICATION
Bushberries Caneberries Strawberry	Aphids Mites Powdery Mildew Rust Sawfly Scales Whiteflies	1-2	As Needed
Grape	Botrytis Leafhoppers Leaf Miners Mealybugs Mites Powdery Mildew Scales Whitefiles	1-2	As Needed

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USEPA MASTER LABEL - SAF-T-OIL

CROP	PEST	APPLICATION RATE Gallons of SAF-T-OIL Per 100 Gallons of Water	TIME OF APPLICATION
Conifers Flower, Foliage and Bedding Plants Omamentals*	Aphlds Black Spot Leaf Miners Mites		
Shade Trees Shrubs	Plant Bugs Powdery Mildew Psyllids Rust Sawfly Scales Whitefiles	1-2	As Needed

***ORNAMENTAL PLANTS** — Oil might remove the glaucous (blue) bloom from such evergreens as Colorado Blue Spruce and Koster Spruce. Use with caution and reduced dosage for summer application on Japanese Red Maple, Amur Maple and Black Walnut. Use with caution and reduced dosage for dormant application on Sugar Maple and Redbud.

GREENHOUSE ORNAMENTALS

CROP	PEST	APPLICATION RATE Gallons of SAF-T-OIL Per 100 Gallons of Water	TIME OF APPLICATION
Azalea Camellia Carnation Fuchsia Gladiola Hibiscus Iris Lily Mums Orchids Poinsettia Rhododendron Rose Vines	Aphids Fungus Gnat Leaf Miners Mealy Bugs Mites Powdery Mildew Rust Scales Thrips Whiteflies	1-2	As Needed

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry, locked area out of reach of children. Protect from excessive heat. Keep container tightly closed in storage to prevent entry of water.

PESTICIDE DISPOSAL: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning, if burned, stay out of smoke.

CONDITIONS OF SALE

Seller's guarantee shall be limited to contents and merchantability of the product and the terms of the label and subject thereto. The buyer assumes any risks to persons or property arising out of use or handling. Because the time, place, rate of applications and other conditions of use are beyond seller's control, seller's liability from storage, handling and use of this product is limited to replacement of product or refund of purchase price.

SUBLABEL B - NON-COMMERCIAL/RESIDENTIAL USE

[Space reserved for logo]

Other oils' larger droplets can cause burn to the plant. Saf-T-Oil's smaller droplets provide uniform coverage with less burn or stress.

SAF-T-OIL

Spray Oil Emulsion Fungicide, Insecticide and Miticide

ORNAMENTALS • VEGETABLES • CITRUS • SMALL FRUITS • TREE FRUITS & NUTS

Controls Aphids, Mites, Scales, Whiteflies and Other Soft-Bodied Insects

For use only in Home Fruit and Vegetable Gardens, Home Greenhouses, Interior Plantscapes, Omamental Gardens, Parks, Golf Courses and Public or Private Lawns or Grounds

Active Ingredient:	
Petroleum Oil	
Other Ingredients:	
Total	

EPA Reg. No. 48813-1

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EPA Est. No. 48813-1L-1

NET CONTENTS: 1 Gallon / 3.78 L or Smaller

Manufactured By:

[Space reserved for logo]

BRANDT CONSOLIDATED, INC.

P.O. Box 277 • Pieasant Plains, IL 62677 (217) 626-1031

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

if Swallowed:	 Immediately call a poison control center or doctor for treatment advice. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give ANY liquid to the person. 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 polson 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 the 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 mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

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 the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Contains petroleum distillate - do not induce vomiting since vomiting may pose aspiration pneumonia hazard.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid breathing spray mists or vapors. Avoid contamination of feed or foodstuffs. Applicators should wear long-sleeved shirt and long pants; shoes plus socks and chemical resistant gloves (such as barrier laminate or nitrile rubber, neoprene rubber, or viton). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep all persons (other than applicator) and pets out of treated areas until sprays have dried.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water. Drifts and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Apply this product only as specified on the label.

Do not allow people (other than applicator) or pets on treatment areas during application. Do not enter treatment areas until spray has dried.

GENERAL INFORMATION

This insecticide's mode of action is through suffocation of eggs, larvae and nymphs of insects and mites and adults of soft-bodied insects. This mode of action necessitates total spray coverage. As a fungicide it interferes with the attachment of the pathogen to the host and acts as a suffocant. Use enough spray solution to completely penetrate the leaf canopy and cover both top and bottom of all of the leaves until wet without significant runoff. Most mature standard trees will require 3 to 4 gallons of spray solution per tree although citrus trees may require as much as 8 to 15 gallons of spray solution per tree. Fruits, vegetables, and omamentals generally require 1 to 2 gallons of spray solution per 1,000 sq. ft.

SAF-T-OIL controls a wide range of mite and insect pests in the egg stage such as: spider and eriophyid mites, armored and soft scares, mealy bugs, psyllids, whitefiles, aphids, leafrollers, leaftiers, webworms, cankerworms, plant bugs, leafhoppers and adelgids. SAF-T-OIL will kill other immature forms if spray covers the insect.

USE PRECAUTIONS — All horticultural cils interfere with or slow plant transpiration and respiration during periods of evaporation. DO NOT apply during periods of drought or when plants exhibit moisture stress.

TIMING THE TREATMENT — You must determine the precise timing to fit local growth and climatic conditions. This product can be applied up to day of harvest.

MIXING DIRECTIONS — SAF-T-OIL mixes readily with water. A pump up sprayer or trigger sprayer may be used. Fill the sprayer half full with water, add the appropriate rate of SAF-T-OIL and continue filling the sprayer. For best results, spray formulation should be mixed well and often.

RATE RECOMMENDATIONS

TREE FRUITS & NUTS

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CROP	PEST	APPLICATION RATE Tbsp. of SAF-T-OIL per 1 Gallon of Water	TIME OF APPLICATION
Almond Apricot Cherry	Aphids Fruit Tree Leaf Roller Mites	2.5-5.0	As Needed
Plum Prune	Scales Whitefiles		

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USEPA MASTER LABEL -- SAF-T-OIL

Apple (all varieties)	Aphids Bugs (including Apple Red Bug) Fruit Tree Leaf Roller Mites (including European Red Mite) Powdery Mildew Scales (Hard, Soft, Scurfy) Whitefiles	2.5-5.0	As Needed
Avocado Banana Cocoa Coffee Macadamia Papaya	Bugs Leafhoppers Scales Sigatoka Leafroller Thrips	2.5-5.0	As Needed
Citrus *	Blackfly Greasy Spot Mites Scales (Glover, Chaff, Purple, Yellow, Red, Snow, Brown and California) Sooty Mold Whitefiles	2.5-5.0	As Needed
Nectarines Peach Pecan	Aphids Fruit Tree Leaf Roller Mites Scales Whiteflies	2.5-5.0	As Needed
Pear (ali varieties)	Aphlds Fruit Tree Leaf Roller Mites (including Pear leaf Blister Mite) Pear Psylla Powdery Mildew Scales Whitefiles	2.5-5.0	As Needed
Pineapple	Aphids Mealybugs Mites Scales	2.5-5.0	As Needed
Fig Klwi Olive Pistachio Walnut **	Aphids Mites Scales	2.5 – 5.0	As Needed

* Citrus — Oils applied after October may increase cold damage to trees; applied in August and September may affect solids content, retard color.

** Walnut - Apply late spring to mid-summer only. Do not apply after husk split.

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CROP	PEST	APPLICATION RATE Tbsp. of SAF-T-OIL Per 1 Gallon of Water	TIME OF APPLICATION	
Asparagus Bean Cucumber Eggplant Melon Peanut Pepper Pumpkin Radish Squash Tomato	Aphids Beetle Iarvae Leafhoppers Leaf Miners Mites Thrips Whiteflies	2.5-5.0	As Needed	
Cabbage Cauliflower Celery Cole Crops Lettuce Onion	Aphids Leafhoppers Leaf Miners Loopers Mites Plant Bugs Thrips Whiteflies	2.5-5.0	As Needed	
Com (Sweet) Popcom Sugar Beet	Aphids Leaf Miners Mites Whiteflies	2.5-5.0	As Needed	
Potato Sweet Potato	Aphids Leaf Miners Mites Whiteflies	. 2.5-5.0	As Needed	

SMALL FRUITS

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CROP	PEST	APPLICATION RATE Tbsp. of SAF-T-OIL Per 1 Gallon of Water	TIME OF APPLICATION
Bushberries (Blueberry, Currant, Elderberry, Gooseberry, Huckleberry) Caneberries (Blackberry, Loganberry, Raspberry) Strawberry	Aphids Mites Powdery Mildew Rust Sawfly Scales Whiteflies	2.5-5.0	As Needed
Grape	Botrytis Leafhoppers Leaf Miners Mealybugs Mites Powdery Mildew Scales Whitefiles	2.5-5.0	As Needed

USE SITES	PEST	APPLICATION RATE Tbsp. of SAF-T-OIL Per 1 Gallon of Water	TIME OF APPLICATION
Conifers	Aphids		
Flower, Foliage and Bedding	Black Spot		
Plants	Leaf Miners		
Omamentals*	Mites		
Shade Trees	Plant Bugs		
Shrubs	Powdery Mildew	2.5-5.0	As Needed
	Payllids		
	Rust		
	Sawfly		
	Scales		
	Whiteflies		

SHADE TREES, SHRUBS, ORNAMENTALS, FLOWER AND FOLIAGE PLANTS

***ORNAMENTAL PLANTS** — Oil might remove the glaucous (blue) bloom from such evergreens as Colorado Blue Spruce and Koster Spruce. Use with caution and reduced dosage for summer application on Japanese Red Maple, Amur Maple and Black Walnut, Use with caution and reduced dosage for dormant application on Sugar Maple and Redbud.

HOME GREENHOUSE ORNAMENTALS

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USE SITES	PEST	APPLICATION RATE Tbsp. of SAF-T-OIL Per 1 Gallon of Water	TIME OF APPLICATION
Azalea Camellia Camation Fuchsia Gladiola Hibiscus Iris Lily Mums Orchids Poinsettia Rhododendron Rose Vines	Aphids Fungus Gnat Leaf Miners Mealy Bugs Mites Powdery Mildew Rust Scales Thrips Whitefiles	2.5-6.0	As Needed

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry, locked area out of reach of children. Protect from excessive heat. Keep container tightly closed in storage to prevent entry of water.

DISPOSAL INSTRUCTIONS: If Empty: Do not reuse this container. Place in trash or offer for recycling if available. if Partially Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

CONDITIONS OF SALE

Seller's guarantee shall be limited to contents and merchantability of the product and the terms of the label and subject thereto. The buyer assumes any risks to persons or property arising out of use or handling. Because the time, place, rate of applications and other conditions of use are beyond seller's control, seller's liability from storage, handling and use of this product is limited to replacement of product or refund of purchase price.