

73342-4

6/11/2013

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Rebecca M. Horton
Ambrands
2030 Powers Ferry Road
Suite 370
Atlanta, GA 30339

JUN 11 2013

Subject: Label Amendment
Product Name: Image Herbicide Consumer Concentrate
EPA Registration Number: 73342-4
Application Dated: May 17, 2013

Dear Ms. Horton,

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

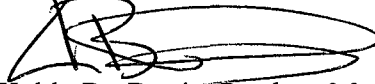
Please note that marketing claims made on the pesticide label must be substantiated by data maintained in your files. If data supporting the marketing claims made on the product label is not available, then those claims must be removed.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA §12(a)(1)(E). 40CFR §156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A stamped copy of your label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products released for shipment after eighteen (18) months from the date of this letter or the next printing of the label, whichever occurs first, must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

If you have any questions, please contact Emily Hartman of my staff at (703) 347-0189 or hartman.emily@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kable Bo Davis', written over a horizontal line.

Kable Bo Davis, Product Manager 25
Herbicide Division
Registration Division
Office of Pesticide Programs

IMAGE® Herbicide Consumer Concentrate

[Additional Brand Name(s): IMAGE® Ready-to-Spray Herbicide Consumer Concentrate]

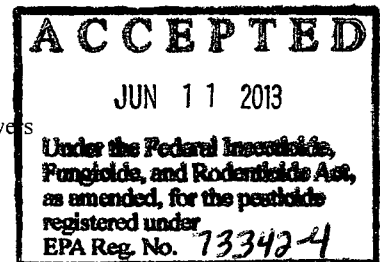
Optional Marketing Statements:

- Kills Nutsedge
- Nutsedge Killer
- Kills Really Tough Weeds [in Lawns]
- [Also] Kills Dollarweed, Wild Onion, Sandbur, Annual Bluegrass
- Can be used to treat listed weeds in dormant Bermudagrass
- Kills tough weeds in dormant Bermudagrass
- Kills summer and winter weeds
- For use on Bermudagrass, Zoysiagrass, St. Augustinegrass and other listed grasses
- Kills Yellow and Purple Nutsedge
- Kills [nutsedge], [chickweed], [white clover], [dandelion], [kyllinga][Poa annua][annual bluegrass] and other listed weeds
- ONE PINT TREATS [COVERS] 4,000 SQUARE FEET**
- 24 FL. OZ. TREATS [COVERS] 6,000 SQUARE FEET**
- 32 FL. OZ. TREATS [COVERS] 8,000 SQUARE FEET**

A Selective Herbicide for Use in Established:

- Bermudagrass
- Buffalograss
- Centipedegrass
- St. Augustinegrass
- Zoysiagrass
- And Selected Landscape Ornamentals and Groundcovers

CONTROLS NUTSEDGE Wild Onion and Sandbur



Optional Marketing Statements (when packaged in RTS applicator):

- Connect and Spray Applicator
- Treats 8,000 sq ft.

Optional Marketing Statements when packaged in 2.5 fl oz single-cartridge for use in [AMDRO Spray delivery system sprayer]:

- Contains XXX cartridges
- Each 2.5 fl.oz. cartridge makes 1 Gal. of spray
- Can be used to spot treat listed weeds in dormant Bermudagrass

[Note to EPA: Front panel marketing label may include graphics representing product use; e.g., pictures with names of weeds such as nutsedge, dollar weed, annual bluegrass (poa annua), wild onion and garlic]

ACTIVE INGREDIENT:

Ammonium salt of imazaquin (2-[4,5-dihydro-4-methyl-4(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-quinolinecarboxylic acid)*3.3%

OTHER INGREDIENTS96.7%

TOTAL100.0%

*Equivalent to 3.14% 2-[4,5-dihydro-4-methyl-4(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-quinolinecarboxylic acid.(1 pint contains 0.6375 pounds of active ingredient as the free acid)

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back [Inside/Side/Other Panel] for Additional Precautionary Statements and First Aid.
(See inside for additional Precautionary Statements, First Aid, and complete Directions For Use.)

Net Contents: _____

EPA Reg No. 73342-4

EPA Est. No. 5905-GA-01_A, 2217-KS-02_B, 59144-GA-1_C,
071106-GA-003_D, 071106-GA-004_E, 74750-GA-1_F,
70815-GA-001_G

Subscript used is first letter of Run Code on Container.

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

Harmful if inhaled or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and pets out of the treated area until sprays have dried.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call (800) 265-0761 for emergency medical information.

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.

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 the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

DIRECTIONS FOR USE

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

Not for use on plants being grown for sale or other commercial use, or for commercial seed production or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown on golf courses or lawns and grounds.

Observe all cautions and limitations on this label. The use of IMAGE Consumer Concentrate not consistent with this label may result in plant injury. Keep container closed to avoid spills and contamination.

Storage & Disposal

Pesticide Storage: KEEP FROM FREEZING. Do not store below 32°F. Store in a cool, dry place inaccessible to children or pets.

Pesticide Disposal: *If partially filled* — Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Container Disposal: *If empty* — Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available.

GENERAL INFORMATION

IMAGE Consumer Concentrate selectively kills (controls) tough weeds like purple and yellow nutsedge, wild onion and garlic, dollarweed, annual bluegrass, and others as listed. It can be used to kill (control) weeds in bermudagrass, St. Augustinegrass, buffalograss, centipedegrass, or zoysiagrass lawn and also in certain landscape ornamentals and groundcovers (see KILL (CONTROL) OF WEEDS IN ORNAMENTALS). IMAGE is mainly absorbed by the roots of sprayed weeds and is translocated throughout the weed to provide complete kill. Complete kill should occur in 3-5 weeks.

[Note to EPA: to include graphics demonstrating weed kill]

1. IMAGE is absorbed into the weed directly after application
2. Weed is yellow and wilted in 1-2 weeks
3. Weed is dead in 3-5 weeks

MIXING INSTRUCTIONS

APPLICATION METHOD Trigger or Pump-up Sprayer			USE RATE
[graphic of trigger sprayer]	[graphic of pump-up sprayer]	Spot Weed Treatment	Mix 2.5 fl. oz. (5 Tablespoons) in 1 gal. of water. [2 teaspoons in 16 fl. oz.]. Spray to wet.
		Large Area Treatment	Mix 0.8 fl. oz. (1-1/2 Tbs.) in 1 gallon of water to cover 200 sq. ft.
Hose-end Sprayers			USE RATE
[graphic of hose-end sprayer]			Use at the rate of 24 fl. oz. Image to cover 6,000 sq. ft. of lawn. Apply in sufficient water (i.e. 5 gallons per 1000 sq. ft.) to insure adequate coverage.
For ORTHO® Dial 'n Spray®, pour 24 oz. Image into jar, set metering dial at 4 tsp. and uniformly apply until jar is empty over 6,000 sq. ft.			
Ortho® and Dial 'n Spray® are registered trademarks of OMS Investments, Inc.			
[AMDRO Spray Delivery System Name]			USE RATE
[graphic of single-cartridge sprayer]			Apply as a spot treatment to wet the weeds to the point of runoff. [One 2.5 fl. oz. Image cartridge covers 625 sq. ft. of lawn.]

(Optional Hose-end Ready Spray)

Apply at the rate of 24 oz. Image to cover 6,000 sq. ft. of lawn
(1 quart Image to cover 8000 sq. ft.)

[hose-end ready spray graphic]

1. Make sure knob control lever is in the OFF position. Shake well and attach to hose.
2. Turn water on at faucet, aim nozzle toward lawn and turn control lever to ON to begin spraying. The product will automatically siphon and mix with water.
3. When finished, turn control lever to OFF position. Turn faucet off. Discharge residual water pressure by turning control lever ON and OFF again.

(Alternate Hose-end Sprayer Directions for applicable packaging)

Apply at the rate of 24 oz. Image to cover 6,000 sq. ft. of lawn
(1 quart Image to cover 8000 sq. ft.)

[hose-end ready spray graphic]

1. Make sure the handle is in the upright position and locked **OFF** position. Shake container well and attach spray nozzle to hose.

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70815-GA-001_G

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- 2. Turn water on at faucet, aim nozzle toward lawn, bend tab back, and rotate handle clockwise towards the hose connection in the **ON** position to begin spraying. The product will automatically siphon and mix with water.
- 3. When finished turn the handle counterclockwise until the handle is in the upright position and locked position. Turn faucet off. Discharge residual water pressure by turning the handle **ON** and **OFF** again. Unscrew spray nozzle from hose.

[Alternate use directions for 2.5 fl.oz. single-cartridge [AMDRO] delivery system.]

[Optional Summary Table for 2.5 fl.oz. single-cartridge [AMDRO delivery system.]

Where to Use	A Selective Herbicide for Use in Established: Bermudagrass St. Augustinegrass Buffalograss Zoysiagrass Centipedegrass And Selected Landscape Ornamentals and Groundcovers
Kills	Tough Summer weeds including yellow nutsedge, purple nutsedge, annual sedge*, green kyllinga, rice flatsedge, globe sedge, dollarweed*, violets*, Virginia buttonweed*, field sandbur, crabgrass*, bahiagrass* perennial ryegrass, tall fescue, common chickweed, dandelion*, white clover Tough Winter weeds including annual bluegrass* (<i>Poa annua</i>), hairy bittercress, lawn burweed, tall fescue, red sorrel, common chickweed, wild onion, cutleaf evening primrose, perennial ryegrass, dovetail geranium, buttercup, knawel, cudweed, purple deadnettle, Carolina geranium, wild garlic, henbit, black medic, parsley-piert, mouseear chickweed, white clover, dandelion*
When to Use	May be applied prior to or soon after emergence of the weeds listed with the exception of wild onion and wild garlic which must be emerged at application time for control.
[How Much to Use]	Mixes [Dilutes] automatically [when] [as] [you] [spray]
[Coverage]	[2.5-fl.oz.] [covers] [625] sq. ft.

*more than one application may be needed

The [AMDRO Spray Delivery System Name] is a patent pending innovative home lawn, landscape, and perimeter tank spray system. Spot treat weeds with this easy to use system.

- 1. Unscrew the tank cap and fill the tank with water up to the one gallon indicator. [The tank holds one gallon of water.]
- 2. Remove the [sprayer][wand][applicator] from the tank holster and unfold the [sprayer][wand][applicator].
- 3. Select the [cartridge][bottle] [pesticide] [herbicide] labeled for intended use. READ THE ENTIRE PRODUCT LABEL PRIOR TO USE.
- 4. Remove the cap from the [cartridge][bottle][herbicide]. [Each [cartridge][bottle] contains 2.5 fl. oz. of [product][liquid].][Each 2.5 fl.oz. [cartridge][bottle] of concentrate makes one gallon of [liquid][ready-to-use] spray.]
- 5. Insert the [cartridge][bottle] [pesticide] [herbicide] into the top of the sprayer and twist until tight.
- 6. Press the trigger to spot spray [weeds] as listed on the product label.
- 7. When finished spot treating remove the [cartridge][bottle] [pesticide] [herbicide]. Replace the cap on the [cartridge][bottle] [pesticide] [herbicide]. Follow label Storage and Disposal instructions for product [pesticide][herbicide] [cartridge] [bottle].
- 8. After spot spraying rinse the [sprayer][wand][applicator] according to the RINSE: USE DIRECTIONS.

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EPA Est. No. 5905-GA-01_A, 2217-KS-02_B, 59144-GA-1_C,
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70815-GA-001_G

Subscript used is first letter of Run Code on Container.

RINSE: USE DIRECTIONS

1. Remove the [cartridge][bottle][pesticide][herbicide]. Ensure that there is water in the one gallon tank.
2. Press and hold the [trigger][sprayer] for 10 seconds to flush the [sprayer][wand][applicator] with clean water from the tank.

CHANGE [CARTRIDGE][BOTTLE]: USE DIRECTIONS

1. Remove the [cartridge][bottle][herbicide] currently loaded in the [AMDRO Spray Delivery System Name].
2. Follow label Storage and Disposal instructions for product [pesticide] [herbicide] [cartridge] [bottle].
3. Press and hold the [trigger][sprayer] for 10 seconds to flush the [sprayer][wand][applicator] with clean water from the tank.
4. Select a new [cartridge][bottle][pesticide][herbicide] labeled for intended use. READ THE ENTIRE PRODUCT LABEL PRIOR TO USE.
5. Insert the [cartridge][bottle][pesticide][herbicide] into the top of the sprayer and twist until tight.
6. Press the trigger to spot spray [weeds] as listed on the product label.
7. When finished spot treating remove the [cartridge][bottle][pesticide][herbicide]. Replace the cap on the [cartridge][bottle][pesticide][herbicide]. Follow label Storage and Disposal instructions for product [pesticide] [herbicide] [cartridge] [bottle].
8. After spot spraying, rinse the [sprayer][wand][applicator] according to the RINSE Use Directions. Store the [AMDRO Spray Delivery System Name] OR RINSE and change [cartridge][bottle].

NOTE: IF OUTPUT SPRAY IS DIMINISHED OR SPUTTERING, DO THE FOLLOWING:

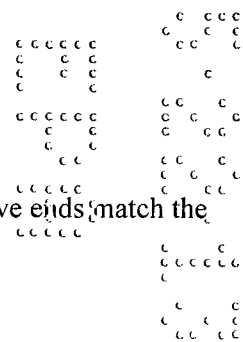
1. Check that there is water remaining in the one gallon tank. If not, refill the tank with water.
2. Check that there is liquid remaining in the [cartridge][bottle]. If not, change to a new [cartridge][bottle].

[Two [cartridges][bottles] can be stored on the back of the [AMDRO Spray Delivery System Name]] .

[Optional:] CHANGING BATTERIES:

If sprayer does not operate or spray performance declines significantly, change the four AA alkaline batteries in the sprayer handle as follows:

1. Remove the [cartridge][bottle].
2. Slide the battery cover open in the underside of sprayer handle.
3. Allow battery cover to swing open.
4. Remove old batteries.
5. Replace with four AA alkaline batteries. Make sure the positive and negative ends match the direction indicated on the inside of the battery door.
6. Close battery door and slide the door until latch is closed.



[AMDRO® Spray Delivery System Name] Helpful Hints

- Remove yellow tab and insure batteries are inserted correctly
- Fill the [AMDRO® Spray Delivery System Name] with one gallon of water prior to loading the cartridge
- Do not discard red caps-keep for storage

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70815-GA-001_G

Subscript used is first letter of Run Code on Container.

- Do not engage the trigger when the wand is folded
- Twist nozzle to switch from mist to stream
- Do not store [AMDRO® Spray Delivery System Name] in excessive heat or cold
- Remove [AMDRO® Spray Delivery System Name] cartridge. Spray water for 10 seconds before switching cartridge or storing
- Never put chemical into the tank. Only water should be put into the tank
- Read the entire label for the selected [AMDRO® Spray Delivery System Name] cartridge prior to use. Observe all precautions and follow directions carefully

APPLICATION INSTRUCTIONS

- Wear long-sleeved shirt, long pants, shoes and socks when applying this product.
- Use only on well-established, non-stressed, labeled lawngrasses with a dense and uniform stand. TEMPORARY YELLOWING MAY OCCUR.
- Water in within 1-7 days after application to wash the IMAGE into the root zone where the greatest weed control activity occurs.
- For difficult to kill weeds, a second application can be made 6 weeks after the initial application.
- For best results, do not mow immediately before or for 48 hours after application.
- IMAGE may injure tall fescue. Do not use on tall fescue when it is used as a desirable turfgrass.
- Wait at least 1½ months after treatment before reseeding, winter overseeding, or plugging lawns.
- Not for use on newly planted or plugged lawns – nor on winter overseeded lawns, such as ryegrass, when the overseeded grass is desirable.
- Avoid application to soil where annual bedding plants may be planted the following year, or plant injury may result.
- Try to avoid overlaps when spraying. Apply only when wind is no more than 10 mph.
- Avoid drift onto vegetables, flowers and unlabeled ornamental shrubs and plants as injury may result.
- Do not graze or feed treated grass clippings. Do not apply in vegetable gardens.
- Do not apply in greenhouses.

KILL [CONTROL] OF SUMMER WEEDS		
To kill [sun graphic]	yellow nutsedge	purple nutsedge
	annual sedge*	green kyllinga
	rice flatsedge	globe sedge
	dollarweed*	violets*
	Virginia buttonweed*	field sandbur
	crabgrass*	bahiagrass*
	perennial ryegrass	tall fescue
	common chickweed	dandelion*
	white clover	

Do not apply during the cooler winter months when turf and weeds are not actively growing. Do not apply just prior to or during transition or during periods of very slow turf growth or severe discoloration could occur.

*More than one application may be needed.

KILL [CONTROL] OF WINTER WEEDS		
To kill [snowflake graphic]	annual bluegrass* (<i>Poa annua</i>)	hairy bittercress
	tall fescue	lawn burweed
	common chickweed	red sorrel
	cutleaf evening primrose	wild onion
	dovetail geranium	perennial ryegrass
	knawel	buttercup
	purple deadnettle	cudweed
	wild garlic	Carolina geranium
	black medic	henbit
	mouseear chickweed	parsley-piert
	dandelion*	white clover

Time applications to follow the first killing frost. IMAGE may be applied prior to or soon after emergence of the weeds listed with the exception of wild onion and wild garlic which must be emerged at application time for control. DO NOT USE ON ST. AUGUSTINEGRASS FOR WINTER WEED CONTROL or other labeled turfgrasses that do not go dormant.

*More than one application may be needed.

KILL (CONTROL) OF WEEDS IN ORNAMENTALS AND GROUND COVERS

IMAGE is effective in killing (controlling) the listed weeds in established landscape plantings. Apply IMAGE spray solution to the area where weeds occur. Applications should only be made over the top of or around the listed ornamentals. APPLICATION TO THE FOLIAGE OR ROOT ZONE OF UNLABELED ORNAMENTALS, PERENNIALS, OR ANNUAL BEDDING PLANTS MAY RESULT IN SEVERE PLANT INJURY. Use only on well-established, non-stressed plants. Ornamentals which are known to be severely injured by IMAGE include azalea, ligustrum (privet), viburnum, pieris, abelia and roses.

IMAGE CAN BE APPLIED TO THE FOLLOWING ORNAMENTALS:

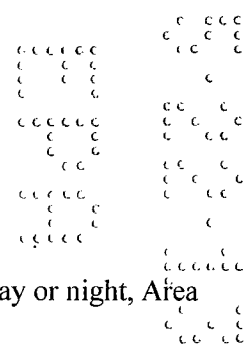
Indian Hawthorne	(<i>Raphiolepis indica</i>)	
Dwarf Yaupon Holly 'Schillings Dwarf'	(<i>Ilex vomitoria</i>)	c c c c c c c c c c c c c c c c c c c c
Blue Pfitzer Juniper 'Pfitzeriana Glauca'	(<i>Juniperus chinensis</i>)	c c c c c c c c c c c c c c c c c c c c
Helleri Holly 'Helleri'	(<i>Ilex crenata</i>)	c c c c c c c c c c c c c c c c c c c c
Red Tip Photinia	(<i>Photinia X fraseri</i>)	c c c c c c c c c c c c c c c
Yucca	(<i>Yucca pendula</i>)	
Wax Myrtle	(<i>Myrica cerifera</i>)	

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Burford Holly 'Burfordii'	<i>(Ilex cornuta)</i>
Gardenia 'Miami Supreme'	<i>(Gardenia jasminoides)</i>
Flame of the Woods	<i>(Ixora coccinea)</i>
Confederate Jasmine	<i>(Trachelospermum jasminoides)</i>
Parsons Juniper 'Parsoni'	<i>(Juniperus conferta)</i>
Blue Pacific Juniper 'Blue Pacific'	<i>(Juniperus conferta)</i>
Blue Rug Juniper 'Wiltonii'	<i>(Juniperus horizontalis)</i>
Red Crape Myrtle 'Red'	<i>(Lagerstroemia indica)</i>
Asiatic Jasmine 'Minima'	<i>(Trachelospermum asiaticum)</i>
Giant Liriope 'Evergreen Giant'	<i>(Liriope muscari)</i>
Variegated Liriope 'Silvery Sunproof'	<i>(Liriope muscari)</i>
Pachysandra	<i>(Pachysandra terminalis)</i>
Mondograss	<i>(Ophiopogon japonicus)</i>
Hosta 'Lancifolia'	<i>(Hosta sp.)</i>
Society Garlic	<i>(Tulbaghia violacea)</i>



[In case of an emergency endangering life or property involving this product, call day or night, Area Code 800-265-0761.]
 [For more information, please visit our website at www.imageforweeds.com.]

NOTICE: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent

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with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call [xxx-xxx-xxxx] [the National Pesticide Information Center at 1-800-858-7378].

Image is a registered trademark of Central Garden & Pet.



Manufactured for:

Ambrands
2030 Powers Ferry Road, Ste. 370
Atlanta, GA 30339

[Batch Code to be inserted at production.]

Made in USA

[Small package, 2.5 fl oz cartridge label for single-cartridge delivery system use]

IMAGE herbicide consumer concentrate

NET CONTENTS 2.5 fl oz (73.93 ml)

ACTIVE INGREDIENT:

Ammonium salt of imazaquin (2-[4,5-dihydro-4-methyl-4(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-quinolinecarboxylic acid)* 3.3%

OTHER INGREDIENTS 96.7%

TOTAL 100.0%

*Equivalent to 3.14% 2-[4,5-dihydro-4-methyl-4(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-quinolinecarboxylic acid.(1 pint contains 0.0375 pounds of active ingredient as the free acid)

Keep out of reach of children

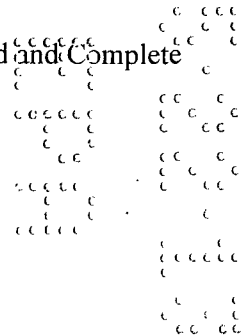
CAUTION

See accompanying box and insert for Additional Precautionary Statements, First Aid and Complete Directions for Use.

AMBRANDS, 2030 Powers Ferry Road, Suite 370, Atlanta, GA 30339

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