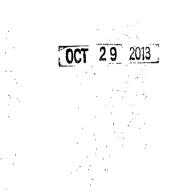
10/29/2013



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



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Gary Gaumer, President Preserve International Inc. P.O. Box 17003 Reno, NV 89511

Subject:

Notification; Per PR-Notice 98-10 Product Name: Sanosil HWP EPA Registration Number: 84526-2 Application Date: September 11, 2013

Dear Mr. Gaumer:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated September 11, 2013 for the product referenced above. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the updated odor claim falls within the scope of PRN 98-10. A copy of this notification will be placed in our records.

If you have any questions regarding this letter, please contact Amaris Johnson at johnson.amaris@epa.gov or call (703) 305-9542.

Sincerely,

Marshall Swindell 7 Product Manager 33 Regulatory Management Branch 1 Antimicrobial Division (7510P) Office of Pesticide Programs

SEPA	Environmental	Inited States I Protectio ngton, DC 204	-	×	] h-gistrati Amendm ] Other	
		Applicatio	n for Pestic	ide - Sectior	1 I	
1. Company/Product Numba 84526-2	)f	· · ·	<b>2. EPA</b> Mars	Product Manager hall Swindell		3. Proposed Classification
4. Company/Product (Name) SanoSil HWP	)		<b>PM</b> 33			None Restrict
5. Name and Address of Ap Sanosil International 91 Lukins Drive New Castle, DE 19720	plicant (Include ZIP Co s is a new address	ode)	(b)(i), i to: EPA	my product is sir	milar or identic	ce with FIFRA Section 3(c)(3 al in composition and labeling
			Section -	11		
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below.			Final printed labels in response to Agency letter dated "Me Too" Application. Other - Explain below.			
Child-Resistant Packaging	Unit Packaging		Section -		2. Type of C	
	Unit Packaging Yes No If "Yes"	No. per	Water Soluble Yes No If "Yes"	Packaging No. per		Metal Plastic Glass Paper
No Certification must be submitted 3. Location of Net Contents	Unit Packaging Yes No If "Yes" Unit Packaging wgt.		Water Soluble Yes No If "Yes" Package wgt	Packaging No. per container	occation of Label	Metal Plastic Glass Paper Other (Specify) Directions
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Child-Resistant Packaging Yes* No * Certification must be submitted 3. Location of Net Contents Label C 6. Manner in Which Label is 1. Contact Point (Complete Name Gary Gaumer	Unit Packaging Yes No If "Yes" Unit Packaging wgt. Information Container Affixed to Product	container 4. Size(s) Ret Lithog Paper Stencil for identification Certifica o this form and misleading state	Water Soluble Yes No If "Yes" Package wgt ail Container ail Container Section - I n of individual to I Title President, Prese tion all attachments ti	Packaging No. per container J Dother No. per S. L S. L S. L S. L S. L S. L S. L S. L	Decessary, tc praz	Metal Plastic Glass Paper Other (Specify) Directions g accompanying product coss this esplication.) reliphone No. (Include Area Code 775-853-9776 S. Date: Application Received (Stamped)



World Headquarters P.O. Box 17003, Reno, NV 89511 • Bus: (775) 853-9776 • Fax: (775) 406-3413 • USA: (800) 995-1607 Tennessee Operation 1213 Empire Avenue, Memphis, TN 38107 • Bus: (901) 272-0031 • Fax: (901) 726-6446 California Operation 1355 Paulson Road, Turlock, CA 95380 • Bus: (209) 664-1607 • Fax: (209) 664-1728

September 12, 2013

Mr. Marshall Swindell U.S. Environmental Protection Agency Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) 1200 Pennsylvania Avenue, N.W. Washington DC 20460-0001

Re: Notification to add odor claim.

Dear Mr. Swindell:

Preserve International, with authorization from Sanosil International, hereby submits this notification for Sanosil International's product Sanosil HWP, EPA registration number 84526-2.

The purpose of the treatment is that the active ingredient, hydrogen peroxide, neutralizes odors when they form, by oxidation.

With this cover, please find the enclosed documents:

1- One copy of the Application for Pesticide, EPA Form 8570-1.

2- Authorization to represent

3- Three copies of the proposed label.

#### Please stamp one of the enclosed labels and return it to the address listed on the application.

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 I may be of further assistance, please feel free to contact me at 775-853-9776. Gegauner preservence a

Sincerely, Preserve International

Gate E. Gaumer President

#### (Note: Bold, italicized text is information for the reader and is not part of the label).

### Sanosil® HWP

Bactericide-Fungicide-Virucide<sup>\*</sup> For Hospital/Institutional/ Industrial/Animal Facility/Farm Use General Disinfectant Concentrate

NOTIFICATION Date Reviewed: 10/2-9/13 Reviewed By: A-Johnson

Active Ingredients:	
Hydrogen Peroxide	.50.0%
Silver	0.1%
Other Ingredients	<u>49.9</u> %
Total1	

#### KEEP OUT OF REACH OF CHILDREN

#### DANGER

See [back] [side] [right] [left] panel for additional precautionary statements.

Net Contents: (as indicated on container)

EPA Reg. No. 84526-2 EPA Est. No. (as indicated on container)

[See bottom or side for Lot/Data code]

Questions? Comments? [symbol of telephone] Call: (1-877-726-6745) [or] Visit us at (www.sanosilglobal.com) Made in [Switzerland] [USA] Distributed by: Sanosil International, LLC, 91 Lukens Drive, New Castle, Delaware 19726 [or an authorized Sanosil International distributor (insert name)]

# <u>Optional Marketing Claims: (note that these claims may or may not appear on the commercial label: in addition. the claims may be used as bullet points or in a paragraph format)</u>

#### Miscellaneous Claims

Introductory New (this claim will only be used for the first six months after commercial introduction) (Unscented) (Scent free) Bleach (Chlorine) (Bleach and Chlorine) (Alcohol) free (formula) (technology) (disinfection) (disinfectant) (sanitization) (sanitizer) Contains no phosphorous (compounds) Dries quickly Dual Action (active) (system) (formula) Everyday formula Fast, Easy, Effective Modern (Classic) On-the-go The (disinfectant) (sanitizer) for the new era. Deodorizes sponges Contains hydrogen peroxide, which breaks down into water and oxygen.

#### General Product Performance/Usage Claims

(Bactericidal) (Bactericide) (Disinfectant) (Disinfects] [Daily] [Multi-Action] (Multi-Purpose) (Multi-Room) (Multi-surface) (Disinfectant) (Sanitizer) (Virucidal\*) (Virucide\*) (Kills pathogenic bacteria and viruses\*) Sanosil HWP can be used on bathroom and shower surfaces, walls, floors, tile, fiberglass, grout and plastic. Controls kitchen odors caused by (insert bacteria) (bacteria) Controls pet odors caused by (bacteria)

(This product) Deodorizes by killing (many) (bacteria) that cause odors.

Deodorizing by killing odor-causing (bacteria) at their source

Eliminates (removes) odors (caused by) (bacteria)

Gets rid of odors by killing the (bacteria) (that cause them)

Gets to the heart of odors

Helps prevent the build-up of odors by killing odor-causing bacteria (on hard non-porous non-food contact surfaces)



#### General Product Performance/Usage Claims - continued

#### Odor fighter

Perfect for eliminating your toughest odors at their source

(This product) Eliminates odors at their source

(This product) prevents odors at their source caused by (bacteria)

To eliminate odors use (this product) around (insert use sites) (insert use surfaces){insert use sites)

Disinfects hard non-porous non-food contact surfaces (such as) (insert use sites)

Disinfects (insert use sites) (and) (insert use surfaces)

For Hospital Use (graphics)

For use in hospitals as a (disinfectant)

For use (on) (in) (insert use sites)(insert use surfaces)

For use in institutional, animal care, restaurants, food-handling establishments and industrial facilities.

For use on hard, non-porous surfaces located in: (insert use sites)

Great for spot disinfection (target performance)

Simply spray (this product) on hard nonporous surfaces that you and your family and pets come in contact with everyday (including): (insert use surfaces)

(This product) (disinfects) (and) (sanitizes) (deodorizes) (the following surfaces) (insert use surface)

(This product) (disinfects) (and) (sanitizes) (in) (the following areas) (insert use sites) Treats, does not cover up (No need to rinse after use) as a sanitizer and disinfectant

Use on hard to reach areas (like nooks and crannies)

Use this product (in) (under) (around) (on) (insert use site)

Ready to use

Use this product (on) (insert use surfaces)

#### Specific Sanitizing Claims

An effective sanitizer for non-food contact surfaces (for use in (insert use sites)) (Sanitizer)

Great for use as a non-food contact surface sanitizer in (insert use sites).

Kills (Destroys) (Eliminates) 99.9% of bacteria

Kills (Destroys) (Eliminates) 99.9% of bacteria on hard, non-porous surfaces

Kills (Destroys) (Eliminates) 99.9% of bacteria on hard, non-porous (kitchen)(bathroom) (surfaces).

Kills 99.9% of antibiotic-resistant bacteria (methicillin-resistant *Staphylococcus aureus*) (MRSA) Kills 99.9% of (household) (kitchen) bacteria on hard, non-porous, non-food contact surfaces.

#### Specific Disinfecting Claims

(Controls)(Kills) odor-causing (bacteria)

Disinfection Control (Formula)

Disinfects (sanitizes) and deodorizes by killing bacteria and controlling their odors.

(Salmonella) (Staph) (MRSA) (Enterobacter Aerogenes) control

Effective against (bacteria)

Eliminates bacteria (viruses<sup>\*</sup>) (and) (odors) on hard non porous surfaces that you (and) (your family) (your children) come into contact with everyday

Fights (and) (kills) odors

(Bacteria) (Virus<sup>\*</sup>) (killer) (destroyer)(eliminator)

Kills the viruses<sup>\*</sup> associated with the flu and the common cold.

Kills the (flu) (common cold) virus

Kills antibiotic resistant bacteria (MRSA)

Kills (Destroys) (Eliminates) (of) (bacteria) on hard non porous surfaces

Kills antibiotic resistant bacteria (Methicillin Resistant) (Staphylococcus aureus) (MRSA)

Kills (bacteria) (eliminates odors) (and) (deodorizes)

Kills (bacteria) (whenever) you need it

Kills (household) (kitchen) (bacteria) on hard non porous, nonfood contact surfaces On hard, non-porous, non-food contact surfaces this product kills bacteria

(This product) (controls) (kills) the (bacteria) that cause unpleasant odors (at the source),

(This product) (helps) reduce cross contamination of (antibiotic resistant bacteria) (on hard, non-porous surfaces)

(This product) (helps) (aids) in the reduction of cross contamination of (antibiotic resistant bacteria) (on hard, non-porous surfaces)

(This product) (helps) (fight the spread of) (antibiotic resistant bacteria) (on hard, nonporous surfaces)

(This product) kills the (bacteria) that cause (bad) odors

(This product) kills bacteria on hard non porous, nonfood contact surfaces in your home and in public places.

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read the entire label before using the product.

Preparation of Use Solution: Dilute 1 part of Sanosil HWP with 9 parts water (1:9)

Prior to disinfection or sanitization, preclean the targer surface. Apply the use-solution to hard, nonporous surfaces, thoroughly wetting surfaces with a cloth, mop, sponge or sprayer. For sprayer applications, spray 6-8 inches from the surface.

<u>To Disinfect</u>: Let stand for ten (10) minutes (to air dry) (rinsing not required) (If desired) (wipe with) (paper towel) (clean dish towel) (or) (absorbent material).

<u>To Sanitize</u>: Let stand for 5 (five) minutes (to air dry) (rinsing not required) (If desired) (wipe with) (paper towel) (clean dish towel) (or) absorbent material).

<u>To Deodorize</u>: Spray on surfaces as needed (let air dry)

Do not use on polished wood, painted surfaces, leather, rayon fabrics, or acrylic plastics.

#### **Refilling or Spray Bottles**

To refill (spray bottles):

- 1. (Remove) Remove trigger sprayer (or) cap from empty bottle
- 2. (Pour) Unscrew cap on refill and pour contents directly into empty bottle.
- 3. (Use) Replace trigger sprayer and use as you normally would (or) unscrew cap and transfer your trigger to this bottle.

The Sanosil HWP use-solution kills the following bacteria and viruses:

#### Bacteria:

Pseudomonas aeruginosa (Pseudomonas) (ATCC # 15442) Staphylococcus aureus (Staphylococcus) (Staph) (ATCC 6538) Salmonella enterica (Salmonella) (ATCC 10708) (Methicillin Resistant) Staphylococcus aureus (Staph) (MRSA) (ATCC 33592) Enterobacter aerogenes (ATCC 13048) Escherichia coli (E coli) (ATCC 11229)

#### <u>\*Viruses</u>

Human Immunodeficiency Virus type 1 (HIV) (Stain HTLV-III<sub>B</sub>) Influenza A strain Hong Kong (flu virus) (ATCC VR-544) Influenza A (H5N1) (influenza) (flu virus) (Strain VNH5N1-PR8/CDC-RG CDC #2006719965) Rhinovirus type 37 (Rhinovirus) (common cold virus) (ATCC BR-1147, Strain 151-1)

#### Fungi

Trichophyton mentagrophytes (ATCC 9533)

#### SURFACES (- Graphic — depicting surface)

#### Hard Non-porous Surfaces

Enamel, Sealed Granite, Brass, Glass, Chrome, Glazed ceramic tile, Copper, Glazed Porcelain, Stainless Steel, Linoleum, cultured marble, Vinyl (tile), synthetic marble. Do not use on glasses, dishes and utensils or other food contact surfaces.

Bathroom surfaces, Exterior surfaces of (Microwave [oven], Oven, Refrigerators), Bathtub (Tub), Examination tables, Mirror, Remote controls, Telephones, Bed Frame Fixtures, No wax floors, (Resilient)(ceramic)Floor, Bed Springs, Floors, non-wood baby furniture, Salad Bar Sneeze Guards, Bidet Faucets (non-wood), Cabinets, garbage (cans) (pails), (non-wood) chairs, Shower (Stall) (Area), Cat litter boxes, (non-wood) crib, Shower (curtain)(plastic)(liner) (and glass-topped), Furniture (non-wood), Highchair (non-wood), Sinks (basin), Clean-up carts, Sports equipment, Nonfood contact Counter (Countertop), Crystal, (Non-wood) Outdoor Stretchers, (Household) tools (patio), Nonfood contact table (tabletops), Desk Laminate (surfaces), Parquet Tin (Diaper) changing tables, Lamps, Patient Chairs,

Nonfood contact (Counters) and (tables), Linen carts, Plastic Toilet (Seats) (areas), Diaper Pails, Plastic (baby) (Children)Toys, (Toilet) (Urinal), Litter boxes, Plastic Laundry Basket (Con-(Hamper), Under sinks Dish Racks, Plastic mattress covers, Door Knob (handle), Washable Wall Paper, Dressing carts, Wheelchairs, Metal Portable Toilets, Whirlpool interiors, Metal Blinds, Recycling bins, Windows (windowsills), (Electronic) remote controls

#### HOUSEHOLD USE SITES (- Graphic — depicting surface)

Attic (damp), Storage Area Rooms, Laundry Room, Public eating places Automobile, Den, Study, Litter boxes, Public places Basement, Dining Room, Living Room, (Public) restrooms Bathroom, Dorm lockers, Sunroom Bedroom, Family Room, Mobile Home, Supermarket (grocery store) Boat, Garage, Mud Room, Tool Shed Camper Home, House, Nursery, Vacation home Car, (Home) Workshop, Pet areas, Vehicles, Recreational Vehicle (RV) Closets, Kitchen, Playroom

#### **PROFESSIONAL USE SITES (Graphic — depicting surface)**

Airplane, Factory, Kitchen, Public places Air conditioning and/or heating vents Ambulance, Gymnasium (gym), Laboratory, (Public) restrooms Blood Bank, Health Care Facility, Manufacturing Plant, Public telephones (booth) Boat, Health Club, (Medical) Clinic, Recreational Center Bowling Alley, Hospital, Military Installation, Restaurant Business, Hotel, Motel, Nursery, Child Care, Schools, School Cafeteria, Infirmary, Nursing Home, School Bus Campground (facility), Industrial, Building Office (Buildings), Shelters Clinics, Institutional, Patient Rooms, Sick rooms College (Institutional), Bathroom, Pharmacy, Toll Booth Commercial Building, (Institutional) kitchen, Physicians Office, Train Interiors Convenience stores (Institutional), Laundromat, Playground (facility), Veterinary (office)(clinic) Day Care Centers, (Institutional) Restroom, Public eating places, Waiting Rooms Dental Office, Kennel, Public facility, Warehouse, Club **Doctors Office** 

Hospitals

#### CLEANING POULTRY & LIVESTOCK DRINKING WATER LINES

 For drinking water lines 500 feet in length or less, using water holding tanks, make a 3% Sanosil HWP stock solution by mixing 3 gallons of Sanosil HWP with 97 gallons of water.
 For drinking water lines exceeding 500 feet in length, using holding tanks, make a 3% Sanosil HWP stock solution by mixing 6 gallons of Sanosil HWP with 194 gallons of water.

Pump the 3% Sanosil HWP stock solution, completely filling the drinking water lines.
 If the drinking water lines are not supplied by water from holding tanks, you may either prepare a 3% Sanosil HWP stock solution in a 50 gallon tank by mixing one and one-half (1&1/2) gallons of Sanosil HWP with forty-eight (48.5) gallons of water, pumping this solution into the water line, repeating this process as often as needed, until water line is filled or you may fill the water line, using a proportioner, set to inject undiluted Sanosil HWP at a rate of 1:33 (3%).

5. After the waterline is filled with the 3% Sanosil HWP solution, activate nipple drinkers to insure solution contact with drinkers.

6. Allow the 3% Sanosil HWP solution to remain in the water lines for 24 – 48 hours.

7. Flush lines with fresh water until water is visibly clear.

#### Disinfection and Deodorzing Animal Housing Facilities and Buildings. Farm Equipment. Poultry Premises. Coops. Trucks and Crates

1. Remove all animals/poultry from the facilities, items/areas to be disinfected.

- 2 Remove gross soils, liters, droppings, etc with a warm water flush or by sweeping.
- 3. Empty all troughs, racks, and other feeding and watering equipment.
- 4. Thoroughly clean all surfaces with detergent or cleaning solution and rinse with water.
- 5. Prepare a disinfecting use solution by adding 1 oz of Sanosil HWP to 9 ounces of water.
- 6. Make sure area is well-ventilated prior to initiating treatment.
- 7. To disinfect, saturate surfaces with a disinfecting solution for at least 10 minutes.
- 8. Prior to reuse, thoroughly scrub treated feed equipment (e.g, feed racks, troughs, fountains, etc.) with a detergent and rinse with water.
- 9. Keep animals/poultry out of treatment areas and/or do not use treated equipment until solution has been completely absorbed and air dried.

#### **Poultry Hatchery Disinfection**

1. Remove any eggs, chicks, poultry and feeds along with all gross soils and other hatchingrelated debris.

2. Thoroughly clean all surfaces with an appropriate detergent or cleaning solution; then rinse with water.

3. Prepare a disinfecting solution by adding 1 oz. of Sanosil HWP to 9 oz. of water.

4. Make sure area is well-ventilated prior to initiating treatment.

5. Apply disinfecting solution via wiping, mopping, or spraying (use a coarse spray device onto the surface to be treated. Let the use-solution soak in on the treated surface for at least 10 minutes and then allow to air dry.

6. Reintroduce eggs and chicks after all surfaces have dried.

## Commercial AGRICULTURAL OR INDUSTRIAL water system injection for the oxidization of odors when they form:

In well systems, the Sanosil HWP is injected with a peristaltic pump through a t/4 inch plastic tube (or other comparable injection system) inserted into the well all the way to the well intake screens. The most distant faucet is tested with a supplied test strip until a residual of 25-50 ppm hydrogen peroxide is detected indicating that the system has been thoroughly treated. The comparation pump should then be adjusted to deliver 25 ppm on a consistent basis to the water system.

|||

When treating the watering system for sick animals, the most distant faucet is tested with a test strip until a residual of 100-1,000 ppm hydrogen peroxide is detected indicating that the system has been thoroughly treated. When this level is reached the injection is immediately reduced until the test strip indicates the 25 ppm is reached and the system is maintained at the 25 ppm level. This process can be repeated monthly to ensure a clean water system and avoid screen clogging.

#### Fogging

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Fogging of Sanosil HWP can be used for treating hard, nonporous surfaces in rooms as an adjunct following regular manual cleaning and disinfecting of room surfaces. Sanosil HWP ready to use product is recommended for use in fogging operations as a supplemental measure either before or after regular cleaning and disinfecting procedures. Fog until the area is moist using foggers according to manufacturing's use directions.

#### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Danger. Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed. Do not get in eyes, on skin or on clothing. If fogged, avoid breathing spray mists. Wear protective eyewear such as goggles, face shield or safety glasses and protective clothing (long-sleeved shirt and long pants, socks, rubber gloves and chemical resistant footwear). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

#### FIRST AID

<u>If in eyes</u>: 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.

<u>If on skin:</u> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment.

<u>If swallowed:</u> call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything to an unconscious person. *If product diluted in accordance with the directions for use, gets on skin, medical attention is not required.* 

**NOTE TO PHYSICIAN:** Probably mucosal damage may contraindicate the use of gastric lavage.

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

(If container size is 5 gallons or larger, use the following Environmental Hazards statement). **Environmental Hazards** 

Do not discharge effluent containing this product into lakes, streams, estuaries, oceans prother 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 into sewer systems without containing the local sewage treatment plant authority. For guidance, contact your contact water board or Regional Office of the EPA.

#### PHYSICAL AND CHEMICAL HAZARDS

This product is incompatible with oxidizing and reducing agents.

#### STORAGE AND DISPOSAL

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

Sanosil HWP EPA Master Label 9/12/2013 4

<u>Pesticide Storage:</u> Keep out of direct sunlight and away from heat. Do not freeze. Store in original container in areas inaccessible to small children and pets.

<u>Pesticide Disposal:</u> 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:

*Plastic(Note to Reviewer: One of the following statements will be used)* Nonrefillable container. Do not reuse or refill this container unless the directions for use allow to refill empty container with this product. -or-

Nonrefillable container. Do not reuse or refill this container.

If product leaking or spills should occur, please dilute with water and dry with absorbent material, or dilute with water as it is flushed into waste water drain. Offer for recycling, if available or (replace cap and) discard in trash.