



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

AUG 12 2015

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-101

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

CSC Services of Nevada, Inc.

Registered Agent for:

Amazon Services LLC

2215-B Renaissance Drive

Las Vegas, Nevada 89119

Re: **Stop Sale, Use, or Removal Order for the Unregistered and Misbranded Pesticide “Miraculous Insecticide Chalk” and the Unregistered Pesticide “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk”**
Docket No. FIFRA-10-2015-0141

Dear Madam or Sir:

This letter provides Amazon Services LLC (“Amazon”) notice that the U.S. Environmental Protection Agency, Region 10 (“EPA”) has issued a Stop Sale, Use, or Removal Order (“Order”) prohibiting the distribution or sale of the pesticide products, “Miraculous Insecticide Chalk” and “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk,” under Section 13(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (“FIFRA”), 7 U.S.C. § 136k(a). The enclosed Order is effective immediately upon receipt and pertains to all quantities of “Miraculous Insecticide Chalk” and “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” under Amazon’s control, ownership, or custody.

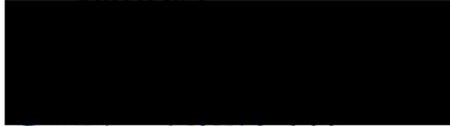
The EPA has determined that “Miraculous Insecticide Chalk” and “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” are unregistered pesticides because the product labeling bears pesticidal claims, the products are comprised of known pesticide ingredients, and the products are not registered with the EPA as pesticides. Therefore, the sale or distribution of these products violates Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A). This provision makes it unlawful to sell or distribute pesticides that are not registered with the EPA.

In addition, the labeling accompanying the “Miraculous Insecticide Chalk” products contains misleading statements. These statements render the products “misbranded” as that term is defined by Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A). Therefore, the sale or distribution of this product also violates Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E). This provision makes it unlawful to sell or distribute pesticides that are misbranded.

Pursuant to Section 13(a) of FIFRA, 7 U.S.C. § 136k(a), the products may not be sold, used, distributed, or removed except in accordance with the conditions outlined in the Order. Any violation of the Order may result in the imposition of civil or criminal penalties as prescribed by Section 14 of FIFRA, 7 U.S.C. § 136l. The Order does not preclude EPA from pursuing other enforcement actions related to this or any other case.

For additional information about this Order, please contact Mr. Chad Schulze at U.S. EPA Region 10, 1200 Sixth Avenue, Suite 900 (OCE-101), Seattle, Washington 98101, or at Schulze.chad@epa.gov. Mr. Schulze may be reached by telephone at (206) 553-0505. For any legal matters concerning this Order, including questions from legal counsel, please contact Brett Dugan, Office of Regional Counsel, at (206) 553-8562 or dugan.brett@epa.gov.

Sincerely,



Edward J. Kowalski
Director

Enclosure

cc: David A. Zapolsky
Secretary, Senior Vice President, and General Counsel
Amazon.com, Inc.
410 Terry Avenue North
Seattle, Washington 98109

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION X
1200 6th AVENUE, Suite 900
SEATTLE, WASHINGTON 98101

<i>In the Matter of:</i>)	ORDER
)	SECTION 13(a)
Amazon Services LLC)	
8329 West Sunset Road)	FEDERAL INSECTICIDE, FUNGICIDE
Suite 220,)	AND RODENTICIDE ACT
Las Vegas, Nevada 89113)	
)	Docket No. FIFRA-10-2015-0141
)	
<u>Respondent</u>)	

I. AUTHORITY

1. This Stop Sale, Use, or Removal Order (“Order”) is issued pursuant to the authority vested in the Administrator of the United States Environmental Protection Agency (“EPA”) by section 13(a) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (“FIFRA”), 7 U.S.C. § 136k(a), which authorizes the Administrator of the EPA to issue an order prohibiting the sale, use or removal of any pesticide or device by any person who owns, controls or has custody of such pesticide or device whenever there is reason to believe that, *inter alia*, the pesticide or device is in violation of any provision of FIFRA or the pesticide or device has been or is intended to be distributed or sold in violation of any provision of FIFRA.
2. This authority has been delegated from the EPA Administrator to the Director of the Office of Compliance and Enforcement for Region 10 through the Regional Administrator for Region 10.
3. Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A), provides that it shall be unlawful for any person in any State to sell or distribute to any person any pesticide that is not registered under section 3 of FIFRA.
4. Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), provides that it shall be unlawful for any person to distribute or sell to any person any pesticide which is adulterated or misbranded.
5. Section 2(s) of FIFRA, 7 U.S.C. § 136(s), defines a “person” as “any individual, partnership, association, corporation, or any organized group of persons whether incorporated or not.”

6. Section 2(u) of FIFRA, 7 U.S.C. § 136(u), defines a “pesticide,” in part, as “any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest.”
See also 40 C.F.R. § 152.15.
7. Section 2(t) of FIFRA, 7 U.S.C. § 136(t), defines a “pest” as “any insect, rodent, nematode, fungus, weed, or . . . any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism (except viruses, bacteria, or other micro-organisms on or in living man or other living animals) which the Administrator declares to be a pest under section [25(c)(1) of FIFRA].”
8. The regulation at 40 C.F.R. § 152.15 states that “a substance is considered to be intended for a pesticidal purpose, and thus to be a pesticide requiring registration, if: (a) the person who distributes or sells the substance claims, states, or implies (by labeling or otherwise) that the substance can or should be used as a pesticide; . . . (b) the substance consists of or contains one or more active ingredients and has no significant commercially valuable use as distributed or sold other than use for pesticidal purpose (by itself or in combination with any other substances); . . . and (c) the person who distributes or sells the substance has actual or constructive knowledge that the substance will be used, or is intended to be used, for a pesticidal purpose.”
9. Section 2(p) of FIFRA, 7 U.S.C. § 136(p), defines “label” as “the written, printed, or graphic matter on, or attached to, the pesticide or device or any of its containers or wrappers.” This section also defines “labeling” as “all labels and all other written, printed, or graphic matter (A) accompanying the pesticide or device at any time; or (B) to which reference is made on the label or in literature accompanying the pesticide or device”
10. Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), defines “to distribute or sell” as “to distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, release for shipment, or receive and (having so received) deliver or offer to deliver.”
11. The regulation at 40 C.F.R. § 152.3 further defines “distribute or sell” as “the acts of distributing, selling, offering for sale, holding for sale, shipping, holding for shipment, delivering for shipment, or receiving and (having so received) delivering or offering to deliver, or releasing for shipment to any person in any State.”
12. Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A), provides that “a pesticide is misbranded if its labeling bears any statement, design, or graphic representation relative thereto or to its ingredients which is false or misleading in any particular.”

II. BACKGROUND

13. Amazon Services LLC (“Amazon”) is a corporation located and incorporated in the State of Nevada. Therefore, Amazon is a “person” as defined in section 2(s) of FIFRA, 7 U.S.C. § 136(s).
14. This Order refers to Amazon and all its divisions, offices, and branches, collectively, as “Amazon.”
15. Amazon is an electronic commerce company offering internet-based retail services to businesses and individuals.
16. Amazon offers sellers a service called “Fulfillment by Amazon.” As described by Amazon’s website (accessed via the URL <http://services.amazon.com/content/fulfillment-by-amazon.htm>), “Fulfillment by Amazon (FBA) is a service [Amazon] offers sellers that lets them store their products in Amazon’s fulfillment centers, and [Amazon] directly pack[s], ship[s] and provide[s] customer services for these products.”
17. Participants in the Fulfillment by Amazon service are required to assent to terms and conditions laid out in the document titled “Amazon Services Business Solutions Agreement” (“Agreement”).
18. The Section of the Agreement entitled “Selling on Amazon Service Terms” states, “The selling on Amazon Service . . . is a Service that allows you to offer certain products and services directly on the Amazon Sites.
19. The Agreement defines Amazon Sites to include “amazon.com.”
20. Section F-4 of the Agreement contains Amazon’s covenant to provide storage services for participants desiring to sell products using the Fulfillment by Amazon service.
21. Section F-5 of the Agreement states “As part of our fulfillment services, we will ship units from our inventory of Your Products to the shipping addresses in the Elected Country included in valid customer orders.”
22. On or around December 18, 2014, a website hosted on amazon.com contained an offer to sell the product entitled “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” (“3pcs Website”)
23. The 3pcs Website stated that the product entitled “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” was offered by “Makeaway” and “fulfilled by Amazon.”
24. On or around December 18, 2014, at least five websites hosted on amazon.com contained an offer to sell the product entitled “Miraculous Insecticide Chalk” (“Miraculous Websites”).

25. On or around December 18, 2014, each of the following sellers: KM Distribution, Tomorrow Neverdies, AZ Nationwide, Integrity Sales Unlimited, and prayshop (“Miraculous Sellers”), offered Miraculous Insecticide Chalk on the Miraculous Websites.
26. The Miraculous Sellers indicated on the Miraculous Websites that orders of “Miraculous Insecticide Chalk” were “fulfilled by Amazon.”
27. On December 18, 2014, Chad Christopher Schulze, Pesticide Enforcement Team Lead, United States Environmental Protection Agency, Region 10, purchased one “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” product through the 3pcs Website and five “Miraculous Insecticide Chalk” products through the Miraculous Websites, one from each of the Miraculous Sellers (“Schulze Order”).
28. The invoice for the Schulze Order contained Order Number 102-1508025-5639466.
29. On December 23, 2014, Mr. Schulze received a small cardboard box at the EPA Region 10 Office from “Amazon.com.” The return address on the shipping label stated: Amazon Fulfillment Services; 172 Trade Street; Lexington KY 40511; USA.
30. The packing slip inside the small cardboard box stated in part “your order of December 18, 2014 (Order ID 102-1508025-5639466).”
31. The cardboard box contained an invoice, five small boxes marked “Miraculous Insecticide Chalk” and three small boxes wrapped together in clear plastic with a label stating, “3pcs Cockroach Cockro...alk GUARANTEED TO WORK New.”
32. According to the invoice, Mr. Schulze only received products from three sellers, KM Distribution, Makeaway, and prayshop. The orders from AZ Nationwide, Tomorrow Never Dies, and Integrity Sales Unlimited appeared to be filled by prayshop.
33. Therefore, Makeaway, KM Distribution, and prayshop from at least December 18, 2014, through at least December 23, 2014, participated in the Selling on Amazon Service and the Fulfillment by Amazon Service for the purposes of selling the “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” product and the “Miraculous Insecticide Chalk” product.
34. The “Miraculous Insecticide Chalk” container and inner leaflet sold by KM Distribution and fulfilled by Amazon states, in pertinent parts:
 - Miraculous Insecticide Chalk
 - Kills Cockroaches and Ants Effectively Low Poisonous
 - Kills Cockroaches and Ants Effectively. Harmless to Human Being and Animal. Safe to Use.
 - This product and bug can kill efficiently the cockroach, ant, the louse, flea. In particular it has miraculous effect in killing parasites (mite, tick, louse, etc.) upon livestock.

- **DIRECTION FOR USE – 1.**The chalk is more effective to use at night.Draw several parakkel lines each 2 to 3 cm apart across the track,which the insect used to take or around the insect’s hidden lyingplace. The insect will be killed whes it touches the powder of the chalk. **2.**Draw two to three circles around the feet of the food cabinet, the bait for the insects or the garbage pile. **3.** The chalk may be into several pieces before using. In drawing the lines, try to leave mire powder on yt so as to acquire better results.*(sic)*

35. At the time of purchase (December 18, 2014), KM Distribution’s website for Miraculous Insecticide Chalk hosted on amazon.com stated:

Miraculous Insecticide Chalk
by Torasia Market
59 customer reviews| 8 answered questions

Price: \$4.70 & FREE Shipping on orders over \$35. Details

In Stock.
Sold by KM Distribution and Fulfilled by Amazon. Gift-wrap available.

Want it tomorrow, Dec. 19? Add it to a qualifying order within 19 hr 55 mins and choose Same-Day Delivery at checkout. Details

Kills cockroach and ant effectively.
Harmless to human being and pets

36. The “Miraculous Insecticide Chalk” container and inner leaflet sold by prayshop and fulfilled by Amazon states, in pertinent parts:

- Miraculous Insecticide Chalk New
- Kills Cockroaches and Ants Effectively Low Poisonous
- The miraculous insecticide in highly effective, low poisonous. It kills cockroaches, ants, lice, and flea.
- This miraculous chalk is a kind of contact insecticide. The insect’s nervous system will fail to function and it will die within 4-10 hours, after touching the powder with any part of its body.

- **DIRECTION FOR USE** – 1. The chalk is more effective to use at night. Draw several parallel lines each 2 to 3 cm apart across the track, which the insect used to take or around the insect’s hidden lying place. The insect will be killed when it touches the powder of the chalk. 2. Draw two to three circles around the feet of the food cabinet, the bait for the insects or the garbage pile. 3. The chalk will not produce pollution. Just wash your hands with water after handling the chalk. 4. The chalk may be cut into several pieces before using. In drawing the lines, try to leave more powder on it so as to acquire better results.

37. At the time of purchase (December 18, 2014), prayshop’s page for “Miraculous Insecticide Chalk” hosted on amazon.com stated:

Miraculous Insecticide Chalk

by Torasia Market

59 customer reviews| 8 answered questions

Price: \$7.50 & FREE Shipping on orders over \$35. Details

In Stock.

Sold by prayshop and Fulfilled by Amazon. Gift-wrap available.

Want it tomorrow, Dec. 19? Add it to a qualifying order within 1 hr 35 mins and choose One-Day Shipping at checkout. Details

Kills cockroach and ant effectively.

Harmless to human being and pets

38. The “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” container sold by Makeaway and fulfilled by Amazon states, in pertinent parts:

In English:

- 3pcs Cockroach Cockro...alk GUARANTEED TO WORK new
- Cypermethrin 1.1%

English translation of original Chinese:

- Asia Pacific Brand. This chalk kills cockroaches & ants. The registration number is ...
- Instructions: To kill, only need to apply it at places where bugs might appear.
- Warnings: Wash hands with water after application & keep it away from children and pets.
- Storage: keep it at a place where is dry, avoid excessive heat & contact with air, to achieve maximum effect.

English translation of original Thai:

- Insecticide Chalk for Roach and Ant
- Active Ingredient
- Insecticide Chalk for Cockroach and Ant Steamship Brand
- Benefit: Use to terminate cockroach and ant by direct exposure. When any body parts of the cockroach touches the chalk, its nervous system will stop working and the cockroach will die soon later.
- Direction: Only with Insecticide Chalk for Roach and Ant Steamship Brand, you can terminate cockroach and ant by marking their passage. Apply at night and wipe off in the morning.
- Caution: After handling this poisonous object, you must wash your hands with soap and water each time.

39. At the time of purchase (December 18, 2014), Makeaway's website for "3pcs Cockroach Cockroaches Bugs Ants Roach Kills" hosted on amazon.com stated:

3 pcs Cockroach Cockroaches Bugs
Ants Roach Kills Chalk
GUARANTEED TO WORK.
by thai-etc-group
18 customer reviews

Price: \$11.44 & FREE Shipping on orders over \$35.
Details

In Stock.
Sold by Makeaway and Fulfilled by Amazon. Gift-wrap available.
Want it tomorrow, Jan. 22? Order within 7 hrs 23 mins and choose One-Day Shipping at checkout. Details

Roach Chalk kills Cockroaches/Ants/Bugs ***Ship From USA
Brand new, sealed, never open
Size : 7 cm long (5 grams each chalk)
Quantity : 3 boxes ***If you want the item within 3 days.
Click Makeaway Fulfillment by amazon.
Free Lighters.

40. On March 11, 2015, EPA Region 10 labeled, bagged and shipped three chalk products to the Washington State Department of Agriculture Chemical and Hops Laboratory (“WSDA CHL”) for analysis. The products sent for analysis included, one “Miraculous Insecticide Chalk” sold by KM distribution one “Miraculous Insecticide Chalk” sold by prayshop and one of the three containers of “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” sold by Makeaway.
41. On March 30, 2015, EPA Region 4 conducted an inspection at the Amazon Fulfillment Services warehouse located at 172 Trade Street, Lexington, Kentucky 40511. The inspector collected a statement from the Safety Specialist for the warehouse describing the distribution of an insecticidal chalk shipment that was returned to the warehouse on January 4, 2015.
42. On April 14, 2015, EPA received the lab results from the WSDA CHL. The results showed that the “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” sold by Makeaway and fulfilled by Amazon contained 1.1% cypermethrin, the “Miraculous Insecticide Chalk” sold by KM distribution and fulfilled by Amazon contained 260 parts per million (ppm) cypermethrin and 230 ppm deltamethrin, and the “Miraculous Insecticide Chalk” sold by prayshop and fulfilled by Amazon contained 3,860 ppm deltamethrin (no cypermethrin).
43. Cypermethrin and deltamethrin are well known pesticide active ingredients that have no significant commercially valuable use as distributed or sold other than use for pesticidal purpose.

III. BASIS FOR THE ORDER

44. EPA has reason to believe on the basis of inspection that at least on or around December 23, 2014, Amazon distributed or sold five “Miraculous Insecticide Chalk” products and one “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” product as the term “distribute or sell” as defined at Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg) and 40 C.F.R. § 152.3.
45. EPA has reason to believe on the basis of inspection that Amazon intends to further distribute or sell “Miraculous Insecticide Chalk” products and “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” products via the Selling on Amazon Service and/or the Fulfillment by Amazon Service as the term “distribute or sell” is defined at Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg) and 40 C.F.R. § 152.3.
46. The statements made on the labeling accompanying the “Miraculous Insecticide Chalk” and “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” products described in paragraphs 34 through 39, above, render these products pesticides as defined by Section 2(u)(1) of FIFRA, 7 U.S.C. § 136(u)(1), and 40 C.F.R. § 152.15(a)(1).
47. The composition of “Miraculous Insecticide Chalk” and “3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk” described in paragraph 42, above, render these products pesticides as defined by Section 2(u)(1) of FIFRA, 7 U.S.C. §136(u)(1), and 40 C.F.R. 152.15(b).

48. "Miraculous Insecticide Chalk" is not registered as a pesticide under Section 3 of FIFRA.
49. "3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk" is not registered as a pesticide under Section 3 of FIFRA.
50. Therefore, EPA has reason to believe on the basis of inspection that the products "Miraculous Insecticide Chalk" and "3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk" are in violation of FIFRA as unregistered pesticides whose distribution or sale violates Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A).
51. The labeling accompanying the pesticide product "Miraculous Insecticide Chalk" sold by KM Distribution and fulfilled by Amazon states in part, "Harmless to human being and Animal. Safe to Use." These claims are misleading and render the product misbranded as that term is defined by Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A).
52. Therefore, EPA has reason to believe on the basis of inspection that the pesticide product "Miraculous Insecticide Chalk" sold by KM Distribution and fulfilled by Amazon is in violation of FIFRA as a misbranded pesticide whose distribution or sale violates Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).
53. The labeling accompanying the pesticide product "Miraculous Insecticide Chalk" sold by prayshop and fulfilled by Amazon states in part, "Harmless to human being and pets" These claims are misleading and render the product misbranded as that term is defined by Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A).
54. Therefore, EPA has reason to believe on the basis of inspection that the pesticide product "Miraculous Insecticide Chalk" sold by prayshop and fulfilled by Amazon is in violation of FIFRA as a misbranded pesticide whose distribution or sale violates Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

IV. ORDER

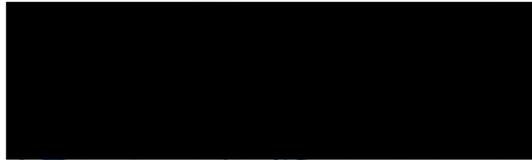
55. Pursuant to the authority of section 13(a) of FIFRA, 7 U.S.C. § 136k(a), EPA hereby orders Amazon to **immediately cease** the sale, use, or removal of the unregistered or misbranded "Miraculous Insecticide Chalk" products and the unregistered "3pcs Cockroach Cockroaches Bugs Ants Roach Kills Chalk" products (collectively "Violative Products") under its ownership, control or custody, wherever such products are located, except in accordance with the provisions of this Order.
56. This Order shall extend to all quantities of the Violative Products intended for sale, distribution, and/or any stocks returned to Amazon from its sellers, customers, or other end-users.

57. The Violative Products shall not be used, sold, offered for sale, held for sale, shipped, delivered for shipment, received, or having so received, shall not be delivered, or offered for delivery.
58. Amazon may move or remove any Violative Products from any facility or establishment ONLY in the following circumstances:
- (a) Movement or removal to dispose of any Violative Products in accordance with all applicable federal, state, and local laws, provided Amazon provides written proof of disposal to Chad Schulze, Office of Compliance and Enforcement, United States Environmental Protection Agency, 1200 Sixth Avenue, Suite 900, Mail Stop OCE-101, Seattle, Washington 98101, Schulze.chad@epa.gov.
 - (b) Movement or removal of any Violative Products between facilities and/or warehouses owned and controlled by Amazon or its affiliates, provided Amazon provides a written accounting prior to the movement of the products to be moved, including the quantities of products to be moved, the address of the facility from which the products will be moved from, and the address of the destination facility, to Chad Schulze, Office of Compliance and Enforcement, United States Environmental Protection Agency, 1200 Sixth Avenue, Suite 900, Mail Stop OCE-101, Seattle, Washington 98101, Schulze.chad@epa.gov.
 - (c) Any movement or removal of any Violative Products other than movement or removal authorized by Paragraphs 58(a) or 58(b), above, shall constitute a violation of this Order.
59. Amazon may seek federal judicial review of the Order pursuant to Section 16 of FIFRA, 7 U.S.C. § 136n. The issuance of this Order shall not constitute a waiver by EPA of its remedies, either judicial or administrative, under FIFRA or any other federal environmental law to address this matter or any other matters or unlawful acts not specified in this Order.
60. This Order shall be effective immediately upon receipt by Amazon or any agents of Amazon.
61. This Order shall remain in effect unless and until revoked, terminated, suspended, or modified in writing by EPA.
62. If any provision or provisions of this Order is/are subsequently held to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired thereby and they shall remain in full force and effect.

V. OTHER MATTERS

63. For any additional information about this Order, please contact Chad Schulze, Pesticide Enforcement Team Lead, at 206-553-0505. For any legal matters concerning this Order, including questions from legal counsel, please contact Brett Dugan, Assistant Regional Counsel, at 206-553-8562.

8/12/2015
Date



Edward J. Kowalski, Director
Office of Compliance and Enforcement