

1015-72

1/12/2009

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Michael Kellog  
Agent for Douglas Products and Packaging Company  
C/O Pyxis Regulatory Consulting, Inc  
4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

JAN 12 2009

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Registrant:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated December 16, 2008 for:

**EPA Registration 1015-72 ROO-PRU Super Tri Pak**

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Banza Djapao of my staff at 703-305-7269.

Sincerely,

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide - Section I**

1. Company/Product Number 1015-72	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Douglas Products and Packaging Company / ROO-PRU Super Tri Pak	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Douglas Products and Packaging Company c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ <b>NOTIFICATION</b> _____  Product Name _____ <b>JAN 12 2009</b> _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

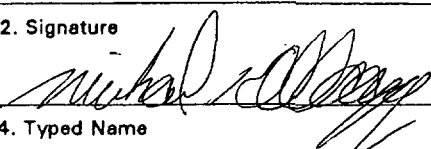
**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, 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.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt    No. per container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2x2.5 gal / 2x10 oz.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 12/16/08	

PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
www.PyxisRC.com

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December 16, 2008



COURIER DELIVERY

**NOTIFICATION**

**JAN 12 2009**

Jim Tompkins (PM 25)  
Document Processing Desk (**NOTIF**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

RE: Douglas Products and Packaging Company – ROO-PRU Super Tri Pak (EPA Reg. No. 1015-72)  
Revision to Container Disposal Instructions per PRN 2007-4

Dear Mr. Tompkins,

On behalf of Douglas Products and Packaging Company please find the enclosed label notification revising the container disposal instructions per PRN 2007-4 for ROO-PRU Super Tri Pak.

ROO-PRU Super Tri Pak consists of a metam-sodium component (packaged in 2.5-gallon plastic container) dichlobenil (packaged in 10 oz. plastic bottle) and a wetting-foaming agent (adjuvant).

In support of this notification submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the ROO-PRU Super Tri Pak labeling with changes tracked
3. One (1) copy of the ROO-PRU Super Tri Pak labeling with changes incorporated

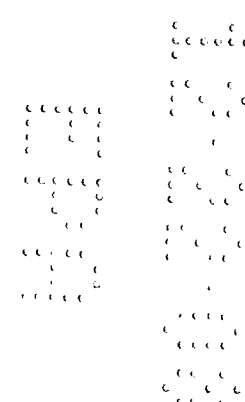
Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

cc: Wes Long; Douglas Products and Packaging Company



**RESTRICTED USE PESTICIDE**

Due to Acute Toxicity

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

**ROO-PRU® SUPER TRI PAK**

Only for use in a combination of metam-sodium, dichlobenil, and foaming agent as directed.

This product contains:

**1. ROO-PRU MS-32.7S**

<b>ACTIVE INGREDIENT:</b>	<b>% By Weight</b>
Metam-sodium (sodium methylthiocarbamate) .....	32.7%
<b>OTHER INGREDIENTS:</b> .....	<u>67.3%</u>
<b>TOTAL:</b> .....	100.0%

Contains 3.18 lbs. active ingredient per gallon.

**2. ROO-PRU DCB-85W**

<b>ACTIVE INGREDIENT:</b>	<b>% By Weight</b>
Dichlobenil (2,6-dichlorobenzonitrile) .....	85.0%
<b>OTHER INGREDIENTS:</b> .....	<u>15.0%</u>
<b>TOTAL:</b> .....	100.0%

**3. ROO-PRU WFA (Wetting-Foaming Agent)**

**KEEP OUT OF REACH OF CHILDREN  
DANGER - PELIGRO**

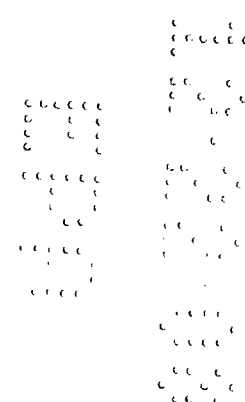
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.  
(If you do not understand the label, find someone to explain it to you in detail.)

**STATEMENT OF PRACTICAL TREATMENT**

- FIRST AID:** Immediately start the procedures given below and contact a Poison Control Center, a physician, or the nearest hospital. Report the type and extent of exposure, describe the victim's symptoms, and follow the advice given.
- IF ON SKIN:** Immediately flush skin with large amounts of running water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention immediately.
- IF IN EYES:** Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart to ensure rinsing of the entire surface of the eye and lids with water. Get medical attention immediately.
- IF INHALED:** Remove victim to fresh air. If not breathing, clear the victim's airway and start mouth-to-mouth artificial respiration. If breathing is difficult, give oxygen preferably with a physician's advice. Get medical attention

**NOTIFICATION**

**JAN 12 2009**



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immediately.

**IF SWALLOWED:** Immediately give several glasses of water but do not induce vomiting. If vomiting does occur, give fluids again. Have a physician determine if condition of patient will permit induction of vomiting or evacuation of stomach. Do not give anything by mouth to an unconscious or convulsing person.

**EPA Reg. No. 1015-72**

**EPA Est. No.**

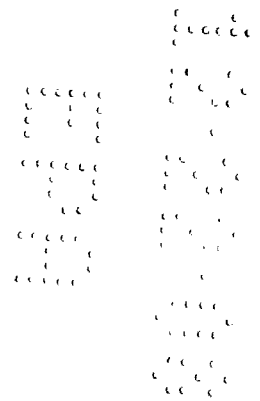
**Manufactured for:**

Douglas Products and Packaging Company  
1550 East Old 210 Highway  
Liberty, MO 64068

**Net Contents:**

- 1. **Metam-Sodium:** ROO-PRU MS-32.7S 5 (2x2 1/2 ) gal.
  - 2. **Dichlobenil:** ROO-PRU DCB-85W 20 (2x10) oz.
  - 3. **Wetting-Foaming Agent:** ROO-PRU WFA 2 (2x1) pt.
- Total 5 CMG\*

\*Chemical mix gallon



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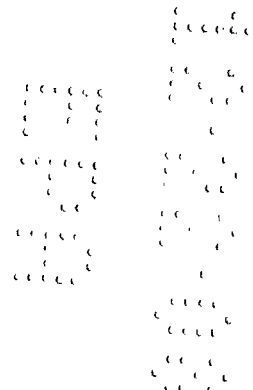
Left Panel – Outer Box Label

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

**CORROSIVE: CAUSES SKIN DAMAGE. MAY BE FATAL IF ABSORBED THROUGH THE SKIN.** Do not get on skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Harmful if swallowed. Harmful if inhaled. Irritating to eyes, nose, and throat. Avoid breathing vapor or spray mist. Irritating to eyes. Do not get in eyes.

**PROTECTIVE CLOTHING AND EQUIPMENT REQUIREMENTS**

1. The following protective clothing and equipment are required to be used by persons actually engaged in carrying out any operations that are likely to involve direct contact with metam-sodium including mixing, loading, equipment calibrations or adjustments, cleaning and repair of application equipment, entering into treated areas, sampling, clean up of spills, rinsate disposal, or any other activities likely to result in direct contact with the product. This protective equipment must also be used for any operations that are carried out within six feet of unshielded, pressurized hoses containing metam-sodium solutions.
  - Splash resistant eye protection
  - Body covering including shirt and long pants or long-sleeved clothing. When a closed system is not used, mixers and loader must also wear a chemical-resistant apron or cloth coveralls.
  - Chemical-resistant boots and gauntlet-type gloves.
2. The following protective equipment must be worn at all times by persons operating or monitoring application equipment.
  - Chemical-resistant footwear
  - Body covering including shirt and long pants or long-sleeved clothing
3. The following protective clothing and equipment must be immediately available at all times for use by persons operating or monitoring application equipment.
  - A proper fit tested NIOSH- or MSHA- approved half face respirator with organic vapor cartridge(s) plus splash resistant eye protection or NIOSH- or MSHA- approved full face respirator with organic vapor cartridge(s). This equipment must be worn in case of emergencies or leaks when the pungent, rotten egg, or sulfur-like odor of metam-sodium is detected.
  - Chemical-resistant gauntlet-type gloves. These must be worn when a person is engaged in carrying out any operation that is likely to involve direct contact with the product, including the operations listed in paragraph No. 1 above.

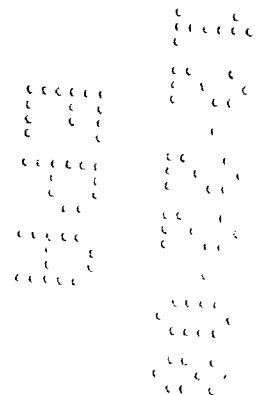


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Left Panel – Outer Box Label (cont.)

### USE PRECAUTIONS

Consideration must be given to all sewer service lines and building elevations and basements for the possibility of foam coming up out of drains. Consideration must be given to distance between houses and sewers to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps and drains with no traps that would allow foam to easily emerge. Building drains may be plugged to protect against backup and flooding. Follow the directions for measurement and use carefully to avoid using excess foam that may be forced up lateral lines to building drains. Lateral lines may be treated, but do not force excessive foam into service lines which may cause it to be forced up lateral lines into building drains. Building occupants should exit structures if the pungent, rotten egg or sulfur-like odor of metam-sodium is detected. Open windows and ventilate with fans. Flush drains with ample water if the odor comes from them. Use a squeegee, dust pan or wet vacuum and garbage bags for spills or backups and dispose of foam and liquid in an open drain or manhole. After removal of foam and liquid, wash area of spill or backup with water and detergent and flush down drain. If rugs or cloth are contacted, take outside and dry before laundering separately.



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Right Panel – Outer Box Label

**ENVIRONMENTAL HAZARDS**

Keep out of lakes, ponds or streams. Toxic to fish and aquatic life. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Equipment washwaters and wastes resulting from the use of this product may be disposed of on site according to label directions for use or at an approved waste disposal facility. Do not use in potable water systems. Do not use in storm, field or other drains unless effluent is treated in a sanitary sewer system. Keep off lawns and plants as they may be severely injured. Foam should be shoveled off planted areas immediately rather than washing off with water.

In case of chemical emergencies involving a spill, leaks, fire, exposure, or accident, contact CHEMTREC 1-800-424-9300.

**USE PRECAUTIONS:** High concentrations of these chemical in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants. Large scale applications to sewage collection systems in proximity to a treatment plant should be divided into smaller sectional treatments done at one or two day intervals to minimize effects on the sewage treatment process. Inform appropriate wastewater treatment plant officials prior to use so they may check for any unusual rotten egg or sulfur-like odor of metam-sodium above that of sewage and monitor the performance of filter beds or digesters. If the odor is detected at the sewage treatment plant or the biological breakdown process is adversely affected, root control applications should cease until normal conditions are established. Subsequent treatments should be reduced in size or volume and spread over greater time intervals.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use or store near heat or open flames.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Refer to the protective clothing and equipment information under PRECAUTIONARY STATEMENTS and use all required protective clothing and equipment. The metam-sodium and dichlobenil may be used only in combination and with a foaming agent to control roots in sewer systems according to the directions for use. They may be used only where wastewater treated for root control will be processed through a wastewater treatment facility.

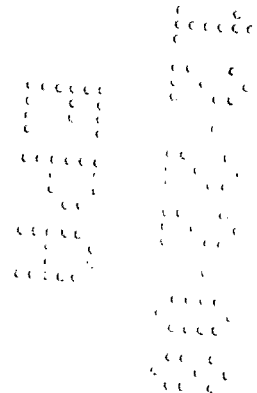
Refer to booklet label on inner package of metam-sodium for detailed directions for use.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal. Refer to booklet label on inner package of metam-sodium for detailed directions for use.

**PESTICIDE STORAGE:** Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetation matter. Do not store near pet or livestock quarters. Store in a well ventilated area. Keep containers tightly closed when not in use. Do not store below 0°F. The liquid components of this TRI-PAK become cloudy or crystallize at lower temperatures. Warm or store at higher temperatures and mix to dissolve crystals and assure uniformity before use.

**PESTICIDE DISPSOAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of 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:**

ROO-PRU MS-32.7S container: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available 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.

**Formatted: Font: Bold**

ROO-PRU DCB-85W container: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available 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.

**Deleted: Plastic Pail:** Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.¶

Outer Box: Dispose of empty box in a sanitary landfill or by incineration or, if allowed by state and local law, by burning. If burned, stay out of smoke.

**Deleted: Plastic Jar:** Completely empty jar into application equipment. Then dispose of empty jar in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.¶

**LIMITATION OF LIABILITY...READ CAREFULLY**

See enclosed booklet.

ROO-PRU is a registered trademark of Douglas Products and Packaging Company.

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Inner Metam-Sodium Booklet Label

**RESTRICTED USE PESTICIDE**

Due to Acute Toxicity

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

**ROO-PRU®  
MS-32.7S**

*A Nonsystemic Fumigant Solution for pruning roots in wastewater collecting sytems*

Only for use as a combination of metam-sodium, dichlobenil and foaming agent as directed.

ACTIVE INGREDIENT:	% By Weight
Metam-sodium (sodium methylthiocarbamate) .....	32.7%
OTHER INGREDIENTS: .....	67.3%
TOTAL: .....	100.0%

Contains 3.18 lbs. active ingredient per gallon.

**KEEP OUT OF REACH OF CHILDREN  
DANGER - PELIGRO**

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

**STATEMENT OF PRACTICAL TREATMENT**

- FIRST AID:** Immediately start the procedures given below and contact a Poison Control Center, a physician, or the nearest hospital. Report the type and extent of exposure, describe the victim's symptoms, and follow the advice given.
- IF ON SKIN:** Immediately flush skin with large amounts of running water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention immediately.
- IF IN EYES:** Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart to ensure rinsing of the entire surface of the eye and lids with water. Get medical attention immediately.
- IF INHALED:** Remove victim to fresh air. If not breathing, clear the victim's airway and start mouth-to-mouth artificial respiration. If breathing is difficult, give oxygen, preferably with a physician's advice. Get medical attention immediately.
- IF SWALLOWED:** Immediately give several glasses of water but do not induce vomiting. If vomiting does occur, give fluids again. Have a physician determine if condition of patient will permit induction of vomiting or evacuation of stomach. Do not give anything by mouth to an unconscious or

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convulsing person.

FOR ADDITIONAL PRECAUTIONARY STATEMENTS: See Inside Booklet

In case of significant spills call CHEMTREC 1-800-424-9300

**EPA Reg. No. 1015-72**

**EPA Est. No.**

**Manufactured for:**

Douglas Products and Packaging Company

1550 East Old 210 Highway

Liberty, MO 64068

**Net Contents: 2.5 Gallons**

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**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMAN AND DOMESTIC ANIMALS  
DANGER**

**CORROSIVE: CAUSES SKIN DAMAGE. MAY BE FATAL IF ABSORBED THROUGH THE SKIN.** Do not get on skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Harmful if swallowed. Harmful if inhaled. Irritating to eyes, nose, and throat. Avoid breathing vapor or spray mist. Irritating to eyes. Do not get in eyes.

**PROTECTIVE CLOTHING AND EQUIPMENT REQUIREMENTS**

1. The following protective clothing and equipment are required to be used by persons actually engaged in carrying out any operations that are likely to involve direct contact with metam-sodium including mixing, loading, equipment calibrations or adjustments, cleaning and repair of application equipment, entering into treated areas, sampling, clean up of spills, rinsate disposal, or any other activities likely to result in direct contact with the product. This protective equipment must also be used for any operations that are carried out within six feet of unshielded, pressurized hoses containing metam-sodium solutions.
  - Splash resistant eye protection
  - Body covering including shirt and long pants or long-sleeved clothing. When a closed system is not used, mixers and loader must also wear a chemical-resistant apron or cloth coveralls.
  - Chemical-resistant boots and gauntlet-type gloves.
2. The following protective equipment must be worn at all times by persons operating or monitoring application equipment.
  - Chemical-resistant footwear
  - Body covering including shirt and long pants or long-sleeved clothing
3. The following protective clothing and equipment must be immediately available at all times for use by persons operating or monitoring application equipment.
  - A properly fit tested NIOSH- or MSHA- approved half face respirator with organic vapor cartridge(s) plus splash resistant eye protection or NIOSH- or MSHA- approved full face respirator with organic vapor cartridge(s). This equipment must be worn in case of emergencies or leaks when the pungent, rotten egg, or sulfur-like odor of metam-sodium is detected.
  - Chemical-resistant gauntlet-type gloves. These must be worn when a person is engaged in carrying out any operation that is likely to involve direct contact with the product, including the operations listed in paragraph No. 1 above.

**USE PRECAUTIONS:** Consideration must be given to all sewer service lines and building elevations and basements for the possibility of foam coming up out of drains. Consideration must be given to distance between houses and sewers to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps and drains with no traps that would allow foam to easily emerge. Building drains may be plugged to protect against backup and flooding. Follow the directions for measurement and use carefully to avoid using excess foam that may be forced up lateral lines to building drains. Lateral lines may be treated, but do not force excessive foam into service lines which may cause it to be forced up lateral lines into building drains. Building occupants should exit structures if the pungent, rotten egg or sulfur-like odor of metam-sodium is detected. Open windows and ventilate with fans. Flush drains with

ample water if the odor comes from them. Use a squeegee, dust pan or wet vacuum and garbage bags for spills or backups and dispose of foam and liquid in an open drain or manhole. After removal of foam and liquid, wash area of spill or backup with water and detergent and flush down drain. If rugs or cloth are contacted, take outside and dry before laundering separately.

#### ENVIRONMENTAL HAZARDS

Keep out of lakes, ponds or streams. Toxic to fish and aquatic life. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Equipment washwaters and wastes resulting from the use of this product may be disposed of on site according to label directions for use or at an approved waste disposal facility. Do not use in potable water systems. Do not use in storm, field or other drains unless effluent is treated in a sanitary sewer system. Keep off lawns and plants as they may be severely injured. Foam should be shoveled off planted areas immediately rather than washing off with water.

In case of chemical emergencies involving a spill, leaks, fire, exposure, or accident, contact CHEMTREC 1-800-424-9300.

USE PRECAUTIONS: High concentrations of these chemical in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants. Large scale applications to sewage collection systems in proximity to a treatment plant should be divided into smaller sectional treatments done at one or two day intervals to minimize effects on the sewage treatment process. Inform appropriate wastewater treatment plant officials prior to use so they may check for any unusual rotten egg or sulfur-like odor of metam-sodium above that of sewage and monitor the performance of filter beds or digesters. If the odor is detected at the sewage treatment plant or the biological breakdown process is adversely affected, root control applications should cease until normal conditions are established. Subsequent treatments should be reduced in size or volume and spread over greater time intervals.

#### PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

#### DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Refer to the protective clothing and equipment information under PRECAUTIONARY STATEMENTS and use all required protective clothing and equipment. The metam-sodium may be used only in combination ROO-PRU DCB 85W and ROO-PRU WFA wetting/foaming agent to control roots in sewer systems according to the directions for use. **They may be used only where wastewater treated for root control will be processed through a wastewater treatment facility.**

#### GENERAL

1. Determine which collection system lines have known root problems and require treatment with root control chemicals.
2. Best results are obtained if the pipe to be treated is cleaned with a high pressure jet cleaner prior to the chemical treatment. When roots are mechanically cut or severely damaged by the cleaning process allow 60 to 90 days for root regrowth to start prior to chemical treatment.
3. Following treatment allow 60 to 90 days for the roots to die and decompose prior to assessing the effectiveness of the treatment.

4. Establish your treatment sequence. In order not to affect previously treated sections, start with the uppermost manhole section of the line to be treated.
5. Check all safety equipment for serviceability. USE THE EQUIPMENT and follow the procedures as described under the, "Protective Clothing and Equipment Requirements" on this label and as prescribed by OSHA for confined space entry.
6. Equipment Calibration: It is recommended that equipment calibration be checked daily or any time conditions of operation change. Due to variation in equipment and conditions, consult and follow the equipment manufacturer's recommendations on calibration procedures. Contact your chemical supplier for the nonpesticidal formulation to use for calibration purposes.
7. Calculate quantity of ROO-PRU/water mix to prepare.

NOTE: FUTURE REFERENCE IN THIS BOOKLET WILL BE MADE TO CHEMICAL MIX (mixture of the three components of the Tri Pak and water) AND CHEMICAL MIX GALLON [CMG] – (mixture of the three chemical components, i.e., 1 gallon MS 32.7S + 4 ounces DCB-85W + 0.4 pints WFA = slightly more than 1 gallon).

The following table provides the recipe for the ROO-PRU chemical mix for Foam Fill application:

1 gallon	MS 32.7S + 4 oz. DCB-85W + 0.4 pt. WFA	= 1 CMG
2 gallon	MS 32.7S + 8 oz. DCB-85W + 0.8 pt. WFA	= 2 CMG
2 ½ gallon	MS 32.7S + 10 oz. DCB-85W = 1.0 pt. WFA	= 2.5 CMG
1 Tri-Pak = 2.5 CMG		
1 Super Tri-Pak = 5 CMG		

Tests show that the chemical mix is stable for at least 7 days prior to use.

**Chemical Preparation:** Prior to diluting chemical with water, mix the three ingredients together by adding the contents of one (1) 10 oz. bottle of ROO-PRU DCB-85W and one (1) pint bottle of ROO-PRU WFA to one (1) 2 ½ gallon container of ROO-PRU MS 32.7S.

Replace 2 ½ gallon cap and invert repeatedly until thoroughly mixed then pour contents into chemical/water mix tank or blend chemical mix and water just prior to the foam equipment. DO NOT store the mixed chemical for more than 7 days. Remix chemical prior to use. DO NOT prepare more chemical/water mix than can be used in one day.

- A. Determine total footage of pipe by pipe diameter and method of treatment, i.e., foam fill or foam spray to be treated in a given day. Use promptly after mixing. DO NOT allow chemical/water mix to stand overnight. DO NOT allow solution to stand (mild agitation is necessary to keep the DCB-85W in suspension). Flush all equipment with water after each days use. Disassemble valves and clean thoroughly.
- B. The two methods of calculating the ROO-PRU mix ratio and amount of chemical mix/water solution to prepare are dependent on pipe diameter and method of application. Pipe diameter 10" or less require filling the entire pipe void with foam (Foam Fill). Pipe diameters of 12" or larger are more economically treated by using a nozzle designed to place foam directly on the root masses and pipe surface (Foam Spray). In addition to pipe size, other factors may dictate the method of application, i.e., wastewater level and velocity of flow, root density, etc,

**Foam Fill:** Four (4) Inch (+) Pipe (entire pipe void)

Foam characteristics desired: dry, dense, and cohesiveness similar to shaving cream.

Application Procedures for Foam Fill Requirements, Mixing and Calculations  
Sewer Pipe Capacities are:

Diameter/Inch	Gal./Foot	Diameter/Inch	Gal./Foot
4	0.7	16	10.5
6	1.5	18	13.5
8	2.5	20	16.3
10	4.0	21	18.0
12	6.0	24	23.5

1. Check sewer pipe capacity table above to determine total foam required. Pipe capacity (foam/foot) x (length of section) + (10-25%) = foam volume required.
2. After determining foam volume in gallons required to fill the section(s) of sewer line to be treated with foam, use the following table to determine the ROO-PRU/water solution required.

Foam Produced Per Gallon of Solution:

To Water	Add ROO-PRU	Amount of Foam Produced
25.0 Gal.	1.0 CMG	540 gal.
50.0 Gal.	2.0 CMG	1,080 gal.
62.5 Gal.	2.5 CMG	1,350 gal. (1 Tri-Pak)
125.0 Gal.	5.0 CMG	2,700 gal. (1 Super Tri-Pak)
200.0 Gal.	7.5 CMG	4,050 gal. (1 ½ Super Tri Pak)

3. Main Line: Insert chemical discharge hose through the entire section of pipe to be treated. Start foam generating equipment and withdraw discharge hose at a rate calibrated to fill the line to capacity until foam appears at input manhole. Refer to equipment manual for the specific calibrated rate of hose retraction.
4. Building Service Lines: USE EXTREME CAUTION. Always plug building side of cleanout to prevent backup into building. Always treat from cleanout closest to building down to sewer main. Attach the chemical discharge hose to a pneumatic type by-pass pumping plug. Insert and position the plug in the service line cleanout and inflate in the cleanout to prevent foam from overflowing and/or the plug blowing out. CAUTION: CHEMICAL OVERFLOWING OR SPILLED ON GROUND ADJACENT TO THE CLEANOUT MAY CAUSE DAMAGE TO DESIRABLE PLANTS AND LANDSCAPING.

Once the plug has been securely inflated, pump foam into the line until required amount has been discharged into the service line. Refer to the equipment manual for specific calibration rate.

**FOAM SPRAY:** Twelve (12) Inch and Larger Pipe (directed to roots and pipe surface).

Foam characteristics desired: Wet, dense, noncohesive. Splatters when applied to manhole walls.

1. Reduce the amount of ROO-PRU WFA (wetting/foaming adjuvant) to one half (1/2) when preparing chemical mix, i.e.:

1.0 CMG	=	0.2 pt. WFA
2.0 CMG	=	0.4 pt. WFA
2.5 CMG	=	0.5 pt. WFA

The excess WFA may be kept and used as a calibration agent.

- See the table below to determine the reference quantity of foam spray needed per foot of pipe, then multiply by the length of pipe to be treated to determine the total amount of finished foam needed.

Pipe Diameter	Foam Gal./Ft.	Pipe Diameter	Foam Gal./Ft.
12"	4	32-36"	12
14"	8	40-42"	14
16"	10	44-48"	16

These reference quantities of foam may be adjusted to account for varying root and flow conditions within the pipe. Foam Gal./Foot x Total = Finished Foam Needed

- In order to determine the amount of chemical mix solution to prepare from the total amount of foam spray required, divide foam spray required by 20 (20 gallons of foam spray are produced from 1 gallon of chemical mix solution) refer to the following table for solution mixing instructions to obtain the proper chemical mix to water (volume/volume).

To Water Coat	Add ROO-PRU	Total Solution	Foam Spray
14 gal.	1 CMG	15 gal.	300 gal.
28 gal.	2 CMG	30 gal.	600 gal.
35 gal.	2.5 CMG	37.5 gal.	750 gal.
70 gal.	5 CMG	75 gal.	1500 gal.

- Foam Spray Application: Insert the chemical discharge hose through the entire section of pipe to be treated, install foam spray nozzle and position about 2 inches above the flow line of the pipe. Start foam generating equipment and withdraw the chemical hose at rate calibrated to foam spray the specified diameter. Refer to equipment manual for specific calibration rate.

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetation matter. Do not store near pet or livestock quarters. Store in a well ventilated area. Keep containers tightly closed when not in use. Do not store below 0°F. The liquid components of this TRI-PAK become cloudy or crystallize at lower temperatures. Warm or store at higher temperatures and mix to dissolve crystals and assure uniformity before use.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of 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:** Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available 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.

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**LIMITATION OF LIABILITY...READ CAREFULLY**



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