UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

SEP 12 2002

Voluntary Purchasing Groups, Inc. c/o Mary Beth Endres
Brazos Associates, Inc.
2001 Diamond Ridge Drive
Carrollton, TX 75010-4509

Dear Ms. Endres:

Subject:

J

Hi-Yield Root Killer

EPA Registration No. 7401-326

Re: Label Amendment to update labels per PRN's 2001-1 and 2001-6

Your application dated June 4, 2002

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable provided you make the following changes:

1. In the Storage and Disposal block, revise the format to read:

STORAGE AND DISPOSAL

Pesticide Storage:

Pesticide Disposal:

Container Disposal:

- 2. Precautionary Statements the Environmental Hazards section should be placed in the Precautionary Statements Block after the Hazards to Humans and Domestic animals section.
- 3. The First Aid statements must be on the front panel.

Please submit one (1) copy of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Sincerely,

Cynthia Giles-Parker Product Manager (22)

Fungicide Branch

Registration Division (7505C)

enclosure

HI-YIELD® ROOT KILLER

[SEWER PIPE ILLUSTRATION WITH ROOT INTRUSION]

Kills Roots and Fungus In Sewer Pipes and Septic Tank Drain Fields

ACTIVE INGREDIENT:

Copper Sulfate Pentahydrate*	99.00%
INERT INGREDIENTS:	<u>1.00%</u>
TOTAL:	100.00%

^{*}Copper as elemental not less than 25.20%

KEEP OUT OF REACH OF CHILDREN

DANGER

See Back Panel For Additional Precautionary Statements

ACCEPTED with COMMENTS In EPA Letter Dated:

SEP | 2 2002

Net Weight 1 1/2 Lbs.

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

=7401-326

[BACK PANEL]

DIRECTIONS FOR USE

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

Hi-Yield® Root Killer is formulated to quickly and economically kill and dissolve roots from trees and shrubs that have entered the sewer line. When used every 3 to 4 months, Hi-Yield® Root Killer will prevent root stoppage and fungus growth. It kills the roots that have entered the pipe lines without harm to trees and shrubs outside the sewer. It will not corrode sewer or drain pipes leading into or out of septic tanks, and it will not harm necessary bacterial action in septic tanks or cesspools. By keeping pipes clear of roots and fungi, Hi-Yield® Root Killer will prevent the formation of odorous gases.

The ideal time to apply this product is before retiring at night, when the use of utilities is low. Top apply, pour 1/3 of the crystals into the toilet bowl. Immediately flush the toilet repeatedly until all the crystals have been flushed down. Repeat this procedure until the entire contents have been flushed down. As a preventive against stoppage, make the above application every 3 to 4 months.

For complete stoppage, use 4 to 6 lbs. and repeat in 7 to 10 days. If serious or complete blockage occurs, rodding may be necessary to assure some flow before treatment. This product may also be used through a distribution box direct to septic tank drainfield. Add sufficient water by hose or pail to carry crystals to point of root penetration or blockage. Do not apply this product through tub or sink drains.

STORAGE AND DISPOSAL

STORAGE: Store in original container. Keep in an area inaccessible to children and pets. DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive. Causes eye damage. Do not get into eyes. Wear goggles or face shield when handling. Wash hands after handling. May be harmful or fatal if swallowed.

[BACK PANEL CONTINUED]

.	FIRST AID et container or label with you when calling a poison control center or doctor, or ent. You may also contact 1-800-222-1222 or 1-800-900-4044 for emergency nt information.
If in eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If 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 swallowed	 Call 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on the labeling

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith. Voluntary Purchasing Groups, Inc. warrants that this product conforms to the chemical description on the label and that the limit of any liability incurred shall be the purchase price paid by the user or buyer.

Voluntary Purchasing Groups, Inc. P.O. Box 460 Bonham, TX 75418

> EPA Reg. No. 7401-326 EPA Est. No. 7401-TX-1

REVISED: 06-04-02 S:\MAIN\VOLUNTARY PURCHASING GROUPS\LABELS\HY ROOT KILLER