

7687-1

11/23/2004

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NOV 23 2004

Erastus Muchioki
Compliance and Safety Manager
Hercules Chemical Co., Inc.
111 South SW
Passaic, NJ 07055

Subject: R-D Root Destroyer
EPA Reg. No. 7687-1
Your amendment dated November 9, 2004

Dear Mr. Muchioki:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

1. In the section "Hazards to Humans and Domestic Animals":
 - a. Change the sentence "Can cause substantial, but temporary, eye injury" to "Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eyewear."
 - b. Change the sentence "Causes skin irritation" to "Causes severe skin irritation."
 - c. Change the sentence "May cause sensitizing reactions in certain individuals" to "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."
2. In the section "First Aid":
 - a. The routes of exposure must be listed in order of decreasing acute toxicity: list in the following order: If in eyes; If on skin or clothing; If swallowed; If inhaled.
 - b. Change the subheader "INCASE OF SKIN CONTACT" to "IF ON SKIN OR CLOTHING."
 - c. In the subsection "IF SWALLOWED", change the instructions to read
 - Call a poison control center or doctor immediately for treatment advice.
 - Have person sip a glass of water if able to swallow.

- Do not induce vomiting unless told to by a poison control center or doctor.
 - Do not give anything to an unconscious person.
- d. The "Note to Physician" should be located in close proximity to the First Aid statement but should be clearly distinguished from it. In other words, it should not be placed within the First Aid statement, but should appear below the last First Aid statement.
- e. Place the First Aid section within a box or otherwise set it off from the rest of the label.
3. Change the "Storage and Disposal", instructions to read:

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

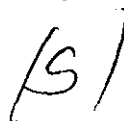
PESTICIDE STORAGE: Store in original container and keep in a locked storage area.

PESTICIDE 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 for disposal instructions. Never placed unused product down any indoor or outdoor drain except as specified by this label.

One copy of the label stamped "Accepted with comments" is enclosed for your records. This label supercedes all labels previously accepted for this product. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,



Dennis McNeilly
Acting Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure

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ACCEPTED
with COMMENTS
In EPA Letter Dated:
NOV 23 2004

FRONT Primary Panel.

20602
R-D
Root Destroyer

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

7687-1

Prevents and Clears
Root-Blocked Sewer Lines. Effective Slow-
Dissolving Crystals

Active Ingredient: Copper Sulphate, Pentahydrate..... 96.9%
Inert Ingredients: 3.1%
(copper as metallic 24.6%)

DANGER
KEEP OUT OF REACH OF CHILDREN. HARMFUL OR FATAL IF SWALLOWED.
CORROSIVE TO EYES. READ ENTIRE LABEL BEFORE USING. SEE SIDE
PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

Net Wt. 2 lbs. (907 g)

SIDE PANELS.

Guarantee

Hercules Chemical Co., Inc. guarantees the purchaser that R-D will perform
as stated when used according to directions, or purchase price will be refunded by
Hercules upon presentation of guarantee coupon inside each container along with sales
slip. No photocopies, please.

HERCULES R-D Root Destroyer

Read entire label before using.

E.P.A. Registration No. 7687-1 E.P.A. Est. No. 7687NJ01

TO OPEN: PRY OFF CAP WITH TOOL OR COIN.

Hercules R-D Root Destroyer is a concentrated chemical compound formulated for root
control. When used as
prescribed in DIRECTIONS, its slow dissolving crystals release a chemical treatment
which is absorbed by infiltrating roots. This kills the roots which decompose and wash
away without injury to the main tree or shrub. The portion of roots destroyed will not re-
enter the sewer or drain. Hercules Break-Thru R-D can be also used in lines leading to
cesspools and septic tanks when used as directed.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER
INCONSISTENT WITH ITS LABELING. BEFORE USING, READ DIRECTIONS ON

PACKAGE INSERT ENCLOSED, AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE LABEL.

To clear partial stoppages: Use 2 to 4 pounds in a single application. Pour R-D into toilet bowl nearest sewer line 1/2 lb. at a time and flush for each 1/2 lb. to be sure all crystals are carried to sewer line OR remove clean out plug and pour entire pckg. directly into sewer line. Flush into sewer with water. NEVER POUR R-D INTO SINK OR TUB DRAINS.

To clear complete stoppages: Some flow must be restored using a snake or sewer rod to enable dissolved R-D to travel to the root clogged portion of the sewer. Use 4 to 6 pounds at one time, or 4 pounds for two consecutive weeks.

In most cases, several days must be allowed for the infiltrating roots to absorb the dissolved chemical, die, decay, and wash away. To prevent root stoppages in house and building sewer connections: Use 2 pounds of R-D twice each year. Use same method as for partial stoppages. To avoid wasting R-D by flushing through a largely unobstructed sewer, apply it in the evening before retiring or during other low flow periods for best results. In sewer mains: Sprinkle two pounds once a year into each junction and terminal manhole. Be careful not to obstruct free flow of sewage.

In storms drains: Do not apply R-D during periods of heavy storm flow. When dry, introduce controlled flow with a hose. Use same dose as in "sewer mains" above. Serious conditions may require larger, more frequent dosage.

Precautionary statements

Hazards to Humans and Domestic Animals

DANGER: Corrosive to eyes. Can cause substantial, but temporary, eye injury. Harmful if swallowed, inhaled, or absorbed through the skin. Avoid contact with skin, eyes, or clothing. Causes skin irritation. May cause sensitizing reactions in certain individuals.

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Drink large quantities of water, or if available, drink promptly lots of milk, egg white or gelatin solution. Avoid alcohol. Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsions may be needed.

IF IN EYES: Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing. Call poison control center or doctor for treatment advice.

INCASE OF SKIN CONTACT: 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 INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. Hercules Toll free no. 800-221-9330

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

STORAGE AND DISPOSAL

Store in original container and keep in locked storage area. Do not contaminate water, food or feed by storage or disposal. Do not reuse the plastic bag or empty container.

Rinse plastic bag thoroughly before discarding in trash.

This product may not be sold in Connecticut or San Francisco Bay Area.

Hercules Chemical Co., Inc. Passaic, N.J. 07055; 1-800-221-9330; www.herchem.com

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