04/28/2005

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7687-1

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

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

APR 2 8 2005

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 December 2, 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 list of ingredients, add the word "Total" and "100.0%" under the other entries
- 2. Delete the following from the section immediately following the signal word "DANGER": "Harmful or fatal if swallowed. Corrosive to eyes."
- 3. Change the section "Hazards to Humans and Domestic Animals" to read as follows: "DANGER: Causes irreversible eye damage. Harmful if absorbed through the skin or inhaled. Do not breath dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin or on clothing. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.
- 4. Place the First Aid section within a box or otherwise set it off from the rest of the label.

One copy of the label stamped "Accepted with comments" is enclosed for your records. 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,

Cand Saddle for

Cynthia Giles-Parker Product Manager (22) Fungicide Branch Registration Division (7505C)

Enclosure

ACCEPTED HILL COMMENTS In IPA Lucier Dured: APR 28 2005

Under the Roderd Increasing and Research Increasing and State and

FRONT Primary Panel.

20602 R-D Root Destroyer

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

DANGER

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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 package. 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. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eyewear. Harmful if swallowed, inhaled, or absorbed through the skin. Avoid contact with skin, eyes, or clothing. Causes severe skin irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

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FIRST AID:

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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.

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 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 by a poison control center or doctor. Do not give anything to an unconscious person.

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

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

ENVTRONMENTAL 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

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

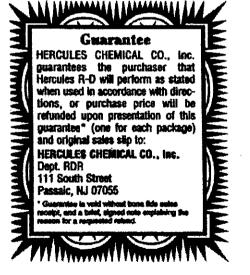
PESTICIDE STORAGE: Store in original container and keep in a locked storage area. PESTICIDE DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recyciling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by this label.

This product may not be sold in Connecticut or San Francisco Bay Area. Hereinles Chemical Co., Inc. Passaic, N.J. 07055; 1-800-221-9330; www.herchem.com © 29:04 HCCI #3255



HERCULES CHEMICAL CO., INC. 111 South Street Passaic, NJ 07055-9100





Now

without any obligation, you can trust Hercules to send you a semi-annual reminder and avoid the uncomfortable and often costly results of a root-blockad sewer.

Just fill in the attached card, detach and mail it today. You are automatically enrolled as a Hercules R-D "TWO-TIMER". Every 6 months from the date you first used R-D, we'll

send a little reminder. And you'll never again be troubled by the fear and danger of recurring root stoppages.

Please enroll me as an R-D "two-timer"

(No need to enroll if you are now receiving reminders) (please print or type)

Name		·····	
Address			······
City	State	Zip	
My R-D Dealer is:			
Name			<u>. </u>
Address	· · · · · · · · · · · · · · · · ·		<u> </u>
City		Zip	
Luced R-D on (data)			

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