



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

December 17, 2025

Barbara Christianson
Director, Product Compliance
HCC Holdings, Inc.
20600 Emerald Parkway
Cleveland, OH 44135

Subject: Label Amendment - Registration Review Mitigation for Copper Compounds
Product Name: HERCULES BREAKTHRU R-D ROOT DESTROYER
EPA Registration Number: 7687-1
Case Number: 674794
Application Dates: March 1, 2024

Dear Barbara Christianson:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Copper Compounds Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for

shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Caleb Carr by phone at 202-566-0636, or via email at carr.caleb@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie R. Javier". The signature is fluid and cursive, with the first name "Julie" being the most prominent.

Julie Javier, Team Leader
Risk Mitigation and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

ENCLOSURE: Stamped label

FRONT PANEL

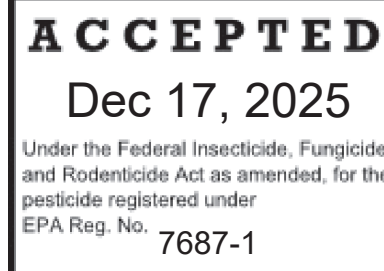
COPPER	GROUP	NOT CLASSIFIED	HERBICIDE
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20602 Net Wt. 2 lbs. 907g

HERCULES BREAKTHRU R-D Root Destroyer

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

Active Ingredient: Copper Sulfate Pentahydrate
(CAS No. 7758-99-8)..... 99.0%
Other Ingredients..... 1.0%
Total 100.0%
(Copper as metallic 25.2%)



DANGER!/PELIGRO:

KEEP OUT OF REACH OF CHILDREN. 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.) READ ENTIRE LABEL BEFORE USING. SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENT.

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Animals

DANGER/PELIGRO: Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Do not get in eyes, on skin or clothing. Wear goggles or face shield. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

FIRST AID/EMERGENCY: CALL 1-877-740-5015 FOR INSTRUCTIONS. Have product container or label when calling a poison control center or doctor for treatment advice, if possible.

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: Rinse hands thoroughly before touching eyes. Hold eyes open and rinse slowly and gently with water for 15-20 minutes. After the first five minutes, remove contact lenses if present and easy to do, and continue rinsing. Call poison control center or doctor for treatment advice. **IF SWALLOWED:** Immediately call a poison control center or doctor for treatment advice. A person should sip a glass of water if able to swallow. Do not induce vomiting unless directed to do so by a poison control center or doctor. Do not give anything away by mouth to unconscious person. **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 a doctor for treatment advice. **IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, and then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

BACK PANEL 1:

GUARANTEE

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

HERCULES BREAKTHRU R-D Root Destroyer

Read entire labels before using.

E.P.A. Registration No. 7687-1 E.P.A. Est. No. {Corresponding to Facility}

INTENDED USES: Hercules BreakThru R-D Root Destroyer is a concentrated compound formulated for root control in sewer lines. It can also be used in lines leading to cesspools and septic tanks when used as directed.

PROHIBITED USES: It is a violation of federal law to use this product in a manner inconsistent with this labeling. This product may not be sold or used in Connecticut or the San Francisco Bay Area. **Never pour product into sinks or tub drains.**

HOW IT WORKS: When used as prescribed in DIRECTIONS, its slow dissolving crystals release a chemical treatment which, over several days, is absorbed by infiltrating roots. This kills the roots which decompose and wash away without injury to the involved tree or shrub. The portion of the roots destroyed will not re-enter the sewer or the drain.

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 AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE LABEL.

PRE-APPLICATION PRECAUTIONS: DO NOT APPLY THIS PRODUCT IN A WAY THAT WILL CONTACT ADULTS, CHILDREN, OR PETS, EITHER DIRECTLY OR THROUGH DRIFT. DO NOT ALLOW ADULTS, CHILDREN, OR PETS TO ENTER THE TREATED AREA UNTIL DUSTS HAVE SETTLED.

Do not apply more than maximum annual application rate of 4 pounds of Hercules Breakthru R-D Root Destroyer (1 pound metallic copper) per year.

APPLICATIONS:

FIRST: Put on goggles or face shield.

TO OPEN: Pry off cap with tool or coin, keeping face away from cap area, which may instantaneously discharge harmful vapors.

TO CLEAR PARTIAL STOPPAGES: WHEN TO APPLY: For product to be most effective, plan application late in the evening after retiring or when there will be minimal water usage. This allows maximum initial chemical contact time with infiltrated roots and avoids wasting the product chemicals by over-diluting and flushing them out. **Toilet Option:** Use a total of 2 pounds of Hercules Breakthru R-D Root Destroyer (0.5 pounds metallic copper) in a single application as follows: Pour 0.5 pounds of product (0.125 pounds metallic copper) into toilet bowl nearest where sewer line exits to outside. Then flush to be sure all crystals are carried into exterior sewer line. Repeat this three times for the total allowed maximum application of 2 pounds of product (0.5 pounds metallic copper). Never pour product into sinks or tub drains. **Sewer Drain Option:** Remove sewer clean out plug nearest where sewer line exits to outside. Then pour entire 2 pounds of Hercules Breakthru R-D Root Destroyer (0.5 pounds metallic copper) directly into sewer line. Disperse into sewer line using a toilet flush or large water bucket. Reduce water usage for best effectiveness. The maximum application rate is 0.5 pounds metallic copper per application. The minimum retreatment interval is 6 months for toilets or sewer drain applications.

TO CLEAR COMPLETE STOPPAGE: First, some flow must be restored through sewer using a snake or sewer rod to enable dissolved product to travel to the root clogged portions of sewer. Then use 2 pounds of Hercules Breakthru R-D Root Destroyer (0.5 pounds metallic copper) using the treatment method described above. Allow several days to two weeks for infiltrated roots to absorb the dissolved chemical, die, decay, and wash away.

TO PREVENT ROOT STOPPAGES: **Toilet Bowl/Sewer Drain:** Use 2 pounds of Hercules Breakthru R-D Root Destroyer (0.5 lb. metallic copper) twice a year using “Partial Stoppages” method above. **In Sewer Mains:** Sprinkle 2 pounds of Hercules Breakthru R-D Root Destroyer (0.5 pounds metallic copper) once a year into each junction and terminal manhole. Be careful not to obstruct free flow of sewage. **In Storm Drains:** Do not apply more than 2 pounds of Hercules Breakthru R-D Root Destroyer (0.5 pounds metallic copper) per drain per year. This product may not be used in municipal or public storm drains and storm sewers. Do not apply product during periods of heavy storm flow. In dry weather, introduce controlled flow with a hose.

Clean-Up: Wash with soap and water after handling. Remove and wash clothing before reuse.

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: Pesticide wastes may be hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If this waste cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or Hazardous Waste Representative at the nearest EPA Regional Office for guidance. If partially filled: Call your local solid waste agency for disposal instructions. Never place unused products down any indoor or outdoor drain except as specified by the label.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Then offer for recycling, if available or puncture and dispose of in a sanitary landfill.

IN CASE OF SPILL: Sweep up into dustpan and then refer to Pesticide Disposal section above.

BACK PANEL 2:

HERCULES BREAKTHRU R-D Root Destroyer

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

Stormwater Advisory Statement: This product may be applied for the purposes of root intrusion control in storm drains or storm sewers that can discharge directly or indirectly into ephemeral or permanent waterbodies. This product must not be used in any municipal or public storm sewer or “MS4” system, or any storm drain system otherwise covered under an NPDES MS4 discharge permit. Copper will accumulate with repeated applications in the waterbodies to which treated storm drains/sewers discharge.

To the extent possible, avoid simultaneous treatments of multiple drain systems that discharge to the same waterbody. Staggering applications to individual stormwater collection points to allow interceding storm events to clear the product from previously treated drains can help reduce the impact to aquatic organisms in receiving waterbodies. Development of and adherence to, a pesticide management plan for storm drains is encouraged.

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

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