OCT 18 2004

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

EPA Registration No. 7687-3 Term of Issuance: conditional

Name of Pesticide Product: Root Force Foaming Root Destroyer
Notice of Pesticide: X Registration _____ Reregistration

This product is conditionally registered in accordance with Section 3(c)(7) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, provided you make the following label changes:

1. Under "Signal Word";

Change "Danger" to "Caution."

2. Add the following statements:

"EPA Reg. No. 7687-3" and "EPA Est. No. 7687-XX-XX."

- 3. Submit the test results of one year storage stability and corrosion characteristics studies for review and acceptance.
- 4. Under "Precautionary Statements";

Replace the "Precautionary Statements" with the following:

"Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wear [specify protective eyewear, if appropriate]. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco."

5. Under Directions for Use";

Add the following statements:

"When using this product indoor, the exhaust fan in the bathroom must be operating during application. If the fan is not available, the window must open during application."

6. Under "First Aid";

Replace these treatments with the following statements. Place "If in eyes" treatments as the first one.

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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.
- Call a poison control center or doctor for treatment advice.

If swallowed:

- 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.

If on skin:

- 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 an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

The following general statements should appear at the end of this section:

- Have the product container or label with you when calling a poison control center or doctor or going for treatment.
- Provide an emergency toll-free telephone number for assistance.

It is recommended that you place the above statements in a box.

6. Under "Environmental Hazards";

Add the following statement after "Do not apply to water . . . on labeling.": "Do not apply to areas where surface water is present or to intertidal areas below the mean high water mark."

7. Under "Storage and Disposal"

You state that the container is triple rinsed before disposal. The product is packaged in a water-soluble bag which is placed directly into the toilet bowl. Does this instruction apply to the water soluble bag or other container? Also, is the "jar" a part of the packaging? Please clarify these points in your final product labeling.

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- 8. The product density data indicates that the loose and packed density is 0.558 and 0.806 g/ml, respectively. Make corrections to ensure that the value reported in the
- 9. proposed confidential statement of formula (CSF) is the same as the value obtained in the study report.
- 10. The EPA Label Review Manual has specific instructions regarding label format (Chapter 3). You should follow these instructions in developing your labeling. The manual can be downloaded from the EPA web site, http://www.epa.gov/oppfod01/labeling/lrm/index.html.

A stamped copy of the label is enclosed for your record. Submit one 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 constitutes acceptance of these conditions.

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Stock No. 20-pending



ACCEPTED with COMMENTS in EPA Letter Dated

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

7687-3

OCT 18 2004

ROOT FORCETM Foaming Root Destroyer In Water Soluble Bags No Measuring! No Mixing! No Mess! Prevents and Clears Root-Blocked Sewers Does Not Contain Copper-Do Not Open Bags

Active Ingredient:

Dichlorbenil (2,6-dichlorobenzonitrile)

0.55%

Inert Ingredients

99.45%

TOTAL

100.00%

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

EPA REG No. 7687-pending

EPA EST No. O65387AR-001

Net Wt. 1 lb. (454 grams)
HERCULES® ROOT FORCE Foaming Root Destroyer
Read Entire Label Before Using

TO OPEN PRY OFF CAP WITH TOOL OR COIN

Hercules ROOT FORCETM is a blend of high foaming surfactants, fillers and the active ingredient dichlobenil, which kills roots and prevents the growth of new roots. When used as prescribed in DIRECTIONS, its foaming system acts as a vehicle, releasing a chemical herbicide, which clings to and is absorbed by infiltrating root tips. This kills the roots, which then decompose and are washed away without injury to the main tree or shrub. Because the product also clings to pipe surfaces new root growth from outside the pipe are inhibited. Hercules ROOT FORCETM can be used in lines leading to cesspools and septic tanks when used as directed.

This product is contained in convenient water-soluble bags to eliminate exposure to the contents of the package. IF THE BAG IS BROKEN OR LEAKING – PLEASE READ WARNING.

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 LABEL AND ALL PRECAUTIONARY STATEMENTS.

Residential Sewer Line-Partial Stoppage: To use as a "preventive" and ensure root-free drainage lines use an 8 oz bag every three weeks during the growing season between March and August and follow with an 8 oz bag every eight weeks between September and March. If drainage is very slow use an 8 oz application twice a week until improvement is noticeable. The soluble bags are dropped (unopened) directly into toilet bowl. The water soluble bags will soften, dissolve and release the chemicals into the water. 2-3 minutes after addition flush the contents. Stirring will accelerate the dissolving process. The mechanical flushing action will activate the foaming surfactants and carry the active ingredients throughout the full dimensions of the sewer pipe. Restrict water usage for 6-8 hours after flushing. Only apply through toilet. The water soluble bags are there for your protection. If the bag is broken, empty contents into toilet, rinse container with water and pour into toilet and flush.

Complete Stoppage: If root growth is severe and there is complete blockage with no flow, manual removal with a snake or sewer rod may be required.

HERCULES CHEMICAL CO., Inc., Passaic, NJ 07055-9100 800-221-9330 www.herchem.com Mfg. for Hercules Chemical Co., Inc.

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS WARNING (IF BAG IS BROKEN)

Can cause substantial, but temporary, eye injury. Harmful if swallowed, inhaled, or absorbed through skin. Avoid contact with skin, eyes or clothing. Wear protection over face and eyes. Avoid breathing vapors. Wash hands, arms and face thoroughly with soap and warm water after handling material from opened or broken bags. Remove conta, minated clothing and wash before reuse. Prolonged exposure to contents of bag may cause allergic reaction in some individuals.

FIRST AID:

IF SWALLOWED: Call physician or poison control center. Drink promptly lots of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Do not induce vomiting or give anything by mouth to an unconscious person.

IF SPLASHED IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes, and get medical attention.

IN CASE OF SKIN CONTACT: Immediately wash skin with soap and water.

IF INHALED: Remove victim to fresh air. Get immediate medical attention. Only give CPR if properly trained and have protective equipment.

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

ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish and aquatic organisms.

Do not apply directly to water except as specified on labeling. Do not use near well or drinking water. Do not contaminate water when disposing of container or materials.

STORAGE AND DISPOSAL:

Store in original container and keep in locked storage area. Do not contaminate water, food or feed by storage or disposal. To dispose of container triple rinse and dispose of at local recycling (if allowable) or sanitary landfill. For accidentally opened bags dispose of contents into toilet and rinse jar thoroughly and dispose of water into toilet.

Bottom:

HERCULES CHEMICAL CO., Inc., Passaic, NJ 07055-9100 • www.herchem.com • 800-221-9330

Labeling for Individual Bags:

Hercules (Logo).

ROOT FORCE Foaming Root Destroyer™

Water Soluble Bags

Contents: Active Ingredient 0.55% dichlobenil

EPA Reg. No. 7687-Pending

Caution: Keep out of Reach of Children

Read all outer packaging and directions for use for additional precautions and instructions

Net Contents: 8 ounces

HERCULES CHEMICAL CO., Inc., Passaic, NJ 07055-7398 • www.herchem.com • 800-221-9330.

Labeling for Individual Bags:

Hercules (Logo).

ROOT FORCE Foaming Root DestroyerTM

Water Soluble Bags

Contents: Active Ingredient 0.55% dichlobenil

EPA Reg. No. 7687-Pending

Caution: Keep out of Reach of Children

Read all outer packaging and directions for use for additional precautions and instructions

Net Contents: 8 ounces

HERCULES CHEMICAL CO., Inc., Passaic, NJ 07055-7398 • www.herchem.com • 800-221-9330.

Type size (in mm):

Hercules (Logo)

ROOT FORCE Foaming Root Destroyer - 6

Water Soluble Bags - 5

Contents: Active Ingredient 0.55% dichlobenil - 4

EPA Reg. No. 7687-Pending - 4

Caution: - 6

Keep out of Reach of Children - 4

Read all outer packaging and directions for use for additional precautions and instructions - 4

Net Contents: 8 ounces - 4

HERCULES CHEMICAL CO., Inc., Passaic, NJ 07055-7398 • www.herchem.com • 800-221-9330. - 4

FRONT LABEL:

STOCK NO.

Product Name:

ROOT FORCE Foaming Root Destroyer In Water Soluble Bags

Tag Line:

No Measuring! No mess!

PREVENTS AND CLEARS ROOT-BLOCKED SEWERS

Active Ingredient: Dichlobenil Herbicide [Dichlorobenzonitrile 2.6]

0.55%

Inert Ingredients:

<u>99.45%</u>

Total:

100%

Front/Middle:

WARNING: KEEP OUT OF REACH OF CHILDREN.

HARMFUL IF SWALLOWED OR INHALED. CAN CAUSE SKIN OR EYE

IRRITATION.

Read Entire Label and Insert Before Using.

E.P.A. Registration No. 7687 E.P.A. Est. No. 065387-AR-001

Bottom/Front:

Net Wt. 1 lb. (454 g)

(2) 8 oz.-bags

One of two "side" panels:

Top:

Hercules ROOT FORCE is a concentrated chemical compound formulated for root control. When used as prescribed in DIRECTIONS, its foaming system acts as a vehicle, releasing a chemical herbicide 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 ROOT FORCE can be used in lines leading to cesspools and septic tanks when used as directed.

This product is contained in convenient water-soluble bags to eliminate exposure to the product's chemicals. IF THE BAG IS BROKEN OR LEAKING – PLEASE READ WARNING.

Middle:

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.

Bottom:

Guarantee: Hercules Chemical Co., Inc. guarantees the purchaser that ROOT FORCE 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.

Read Entire Label Before Using

Two of two side panels:

Top:

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals

WARNING (IF BAG IS BROKEN):

Can cause substantial, but temporary, eye injury. Harmful if swallowed, inhaled, or absorbed through the skin. Avoid contact with skin, eyes, or clothing. Wear protection over face/eyes. Avoid breathing vapors. Avoid splashing or spray mist. Wash hands, arms, and face thoroughly with soap and warm water after handling. Remove contaminated clothing and wash it before reuse. Prolonged use may cause allergic reaction in some individuals.

FIRST AID:

IF SWALLOWED: Call physician or poison control center. Drink promptly lots of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Do not induce vomiting or give anything by mouth to an unconscious person.

IF SPLASHED IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes, and get medical attention.

IN CASE OF SKIN CONTACT: Immediately wash skin with soap and water.

IF INHALED: Remove victim to fresh air. Get immediate medical attention. Only give CPR if properly trained and have protective equipment.

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

ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish and aquatic organisms.

Do not apply directly to water except as specified on labeling. Do not use near well or drinking water. Do not contaminate water when disposing of container or materials.

STORAGE AND DISPOSAL:

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

Bottom:

HERCULES CHEMICAL CO., Inc., Passaic, NJ 07055-9100 • www.herchem.com • 800-221-9330

Hercules (Logo). Directions for Use.

Product Name – Top of page:
New ROOT FORCE Foaming Root Destroyer
With Water Soluble Bags
Sub-Title:
No measuring. No mess.
Prevents and Clears Root-Blocked Sewers

WARNING: KEEP OUT OF REACH OF CHILDREN.
HARMFUL IF SWALLOWED OR INHALED. CAN CAUSE SKIN OR EYE INJURY.

READ ENTIRE LABEL AND ALL DIRECTIONS BEFORE USING.

DIRECTIONS

IT IS A VIOLATION OF FEDRAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. BEFORE USING, READ THESE DIRECTIONS, AS WELL AS ALL PRECAUTIONARY SATEMENTS ON PACKAGE LABEL.

These soluble bags are to be dropped (unopened) directly into toilet or main trap (BUT NEVER INTO BASIN, SINK, OR TUB). The bags dissolve in two minutes and can then be flushed through the drainage lines. Stirring will accelerate dissolving process.

PARTIAL STOPPAGE: To use as a "preventive" and ensure root-free drainage lines, use an 8 oz. bag every three weeks during growing season (approximately between March and August), and follow with an 8 oz. bag every eight weeks (September through February).

If drainage is slow, root growth may require more intensive treatment. Use an 8 oz. application twice each week until noticeable improvement. Then return to preventive treatment as directed above.

COMPLETE STOPPAGE: If root growth is severe and there is complete blockage, manual removal with a snake or sewer rod may be required.

Hercules ROOT FORCE Foaming Root Destroyer is a concentrated chemical compound formulated for root control. The roots absorb this chemical with their water supply, are killed in the process, decompose, and wash away. It is important to note that the part of the roots destroyed in this manner will never again re-enter the sewer or drain.

Hercules ROOT FORCE is acceptable for use in lines leading to cesspools and septic tanks, and will not injure trees or shrubs where used as directed.

Guarantee

Hercules Chemical Co., Inc. guarantees the purchaser that ROOT FORCE 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 sip. No photocopies, please.

HERCULES CHEMICAL CO., Inc., Passaic, NJ 07055-7398 • www.herchem.com • 800-221-9330.