

7687-3

05/08/2013

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

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Forest Hampton III  
HCC Holdings, Inc.  
4700 West 160<sup>th</sup> St.  
Cleveland, OH 44135

MAY 08 2013

Subject: Label Amendment – Update Language, Format, Company Name, and Address  
Root Force  
EPA Reg. No. 7687-3  
Application dated – February 14, 2013

Dear Mr. Hampton:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

Amended labeling will supersede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Submit one (1) copy of final printed labeling before you release the product for shipment. If you have any questions regarding this letter, please contact Maggie Rudick at (703) 347-0257 or [rudick.maggie@epa.gov](mailto:rudick.maggie@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis".

Kable Bo Davis  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)

DRAFT LABEL

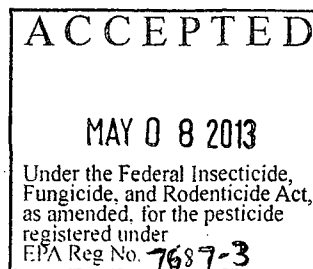
**FRONT PANEL:**

BREAKTHRU

ROOT FORCE™

Foaming Root Destroyer In Water Soluble Bags

- No Measuring! No Mixing! No Mess!
- Prevents and Clears Root-Blocked Sewer Lines
- Will Not Harm Pipes, Trees or Plants



Active Ingredient: Dichlobenil (2, 6-dichlorobenzonitrile) .....0.55%

Other Ingredients: .....99.45%

Total .....100.0%

**CAUTION:**

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.**

<b>FIRST AID</b>	
<b>IF SWALLOWED:</b>	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.
<b>IF ON SKIN OR CLOTHING:</b>	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.
<b>IF INHALED:</b>	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.
<b>IF IN EYES:</b>	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.
<b>FOR EMERGENCY: CALL 1-877-740-5015 FOR INSTRUCTIONS.</b> Have product container or label when calling a poison control center or doctor for treatment advice, if possible.	

Net Wt. 25 lbs. 11,340 g; 50 - 8 oz. bags or Net Wt. 1 lb. 454 g; 2 - 8 oz. bags  
 DO NOT OPEN BAGS

**BACK PANEL 1:**

HERCULES Root Force

E.P.A. Registration No. 7687-3 E.P.A. Est. No. 065387AR-001

**INTENDED USES:** Hercules BREAK-THRU ROOT FORCE is a blend of high foaming surfactants, fillers and the active ingredient dichlobenil, which kills roots and prevents the growth of new roots in residential sewer lines.

**HOW IT WORKS:** 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 growths from outside the pipe are inhibited.

**PACKAGING PRECAUTION:** This product is contained in convenient water-soluble bags to eliminate exposure to the contents of the package. The water soluble bags are there for your protection. IF THE BAG IS BROKEN OR LEAKING – FIRST READ AND FOLLOW PRECAUTIONARY STATEMENTS BEFORE HANDLING. Then, empty contents into toilet, rinse container with water and pour into toilet and flush.

**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.**

**PREPARATION:** Ventilation: When using this product as directed, harmful vapors may be given off by dissolving bag chemicals. The exhaust fan in the bathroom must be operating during application. If the fan is not available, a window must be open during application. Avoid contact: Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application

**APPLICATIONS:**

**TO OPEN: PRY OFF CAP WITH TOOL OR COIN.**

**Residential Sewer Line – Partial Stoppage:** Apply through toilet only. If drainage is very slow, use one 8 oz. application twice a week until improvement is noticeable. Drop one soluble bag (unopened) directly into toilet bowl. The water soluble bag will soften, dissolve and release the chemicals into the water. Stirring will accelerate the dissolving process. Then, 2-3 minutes after the addition, flush toilet. 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.

**Preventive Treatments:** To use as a “preventive” and ensure root-free drainage lines, use one 8 oz. bag every three weeks during the growing season between March and August and follow with one 8 oz. bag every three weeks between September and March. Use the same application method given above under “Partial Stoppage”.

**Complete Stoppages:** If root growth is severe and there is complete blockage with no flow, mechanical removal with a snake or sewer rod may be required. If flow is still slow, use the same application method given above under “Partial Stoppage”. Reapply every 1-2 years to keep pipes free from root blockages, depending upon the severity of root growth.

**Municipal Sewer Line - Partial Stoppage:** The soluble bags are dropped (unopened) directly into waste lines upstream from the root incursion. The water soluble bags will soften, dissolve and release the chemicals into the water. If flow is slow in waste line, follow Root Force addition with 4 to 5 gallons of water per pound of Root Force to activate and support the foaming process. The activated foaming surfactants will carry the active ingredients throughout the full dimensions of the waste pipe.

**Complete Stoppages:** If root growth is severe and there is complete blockage with no flow, mechanical removal with a snake or sewer rod may be required. If flow is still slow, use the same application method given above under "Partial Stoppage". Reapply every 1-2 years to keep pipes free from root blockages, depending upon the severity of root growth.

ROOT FORCE APPLICATION TABLE		
Pipe Diameter (inches)	Pipe Length (Feet)	Root Force Amount (LBS)
8-18"	600-800	25 to 30
6-8"	100-200	6
4-6"	100-200	5
6-8"	50-100	4
4-6"	50-100	3
6-8"	Up to 50	2
4-6"	Up to 50	1

**BACK PANEL 2:**

HERCULES Root Force

**PRECAUTIONARY STATEMENTS:**

**Hazards to Humans and Animals**

*[To be placed on label intended for residential use]*

**CAUTION:**

**Do not open bags.** Bag contents are harmful if swallowed, absorbed through skin, or inhaled. Avoid contact with skin, eyes or clothing, and avoid breathing dusts/vapors. Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. If a bag is broken, empty content into toilet, rinse the plastic container with water and pour into toilet and flush. Users should remove clothing immediately if pesticide gets inside clothing. Then wash thoroughly and put on clean clothing.

*[To be placed on label intended for occupational use]*

**CAUTION:**

**Do not open bags.** Bag contents are harmful if swallowed, absorbed through skin, or inhaled. Avoid contact with skin, eyes or clothing, and avoid breathing dusts/vapors. If bag is broken, empty content into waste line, rinse container thoroughly, and dispose of water into waste line, if not on job-site place contents in container and dispose of at an approved waste disposal facility.

**PERSONAL PROTECTIVE EQUIPMENT:** Applicators and other handlers must wear long-sleeved shirt, long pants, shoes plus socks and chemical resistant gloves. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

**USER SAFETY RECOMMENDATIONS:**

User should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**ENVIRONMENTAL HAZARDS:** Surface Water: This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on label. Do not apply to areas where surface water is present or to intertidal areas below the mean high water mark. Ground Water: This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in ground-water contamination. **Do not use near well or drinking water. Do not contaminate water when disposing of container or materials.**

*[To be placed on label intended for residential use]*

**STORAGE AND DISPOSAL:**

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

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

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Non-refillable container. Do not reuse or refill this container. To dispose of plastic container, triple rinse and place in trash or offer for recycling if available. For accidentally opened bags, dispose of contents into toilet, then triple rinse container thoroughly and pour rinsate into the toilet. Then follow instructions above for container disposal.

*[To be placed on label intended for occupational use]*

**STORAGE AND DISPOSAL:**

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

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

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Non-refillable container. Do not reuse or refill this container. For accidentally opened bags, empty the remaining contents into the waste line. Triple rinse container as follows: Empty the remaining contents into application site. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application site or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill or by incineration. Do not burn unless allowed by state and local ordinances.

HCC HOLDINGS, INC.  
An Oatey Affiliate • 4700 West 160th Street • Cleveland, Ohio 44135  
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