

Mr. David Lawler
Roebic Laboratories, Inc.
25 Connair Road
P.O. Box 927
Orange, CT 06477

AUG 31 1987

Dear Mr. Lawler:

Subject: Amendment - Revised Labeling/Updated Formula
Roebic Root Killer Formula K-77
EPA Registration No. 7792-1
Your Submission Dated August 6, 1987

The updated formula statement is acceptable and has been included in our files. It is understood that the formula dated August 4, 1987 replaces previously accepted formulas for this product.

Revised labeling submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable. A stamped copy of labeling is enclosed for your records.*

Your change of address must be recorded in our Registration Support and Emergency Response Branch. Please notify that office as soon as possible:

Lela Sykes, TS-767C
EPA, Registration Division
401 M Street SW.
Washington, DC 20460

Sincerely yours,

Richard F. Mountfort *RFM*
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

*Although we have no objection to the statement "Safe for pipes and plumbing", it overshadows the precautionary language immediately following it in its

15633; I:Mountfort; MF-10; KENCO; 8/23/87; CB:lf:sh:tg

SYMBOL	ORIGINATOR	present position.	Relocate this statement to a more suitable position	removed			
SURNAME		from precautionary text.					
DATE							

8/3/87

K-77 ROEBIC®

Root Killer

with comment
792-1



once a year

s/b
DANGER:
The artist will make the change.

Safe for pipes and plumbing

DANGER: Keep out of reach of children. May be harmful or fatal if swallowed. Corrosive to eyes.

See back panel for additional precautionary statements.

Active ingredient Copper Sulfate Pentahydrate 99%

Inert ingredients 1%

Copper as elemental not less than 25.20%

Net wt. 32 oz. (2 lbs)

908 grams.

K-77 Root Killer

ROEBIC Root Killer kills roots in pipes and eliminates the job of clearing pipes surrounding trees, ground cover or natural cesspools. Safe for plastic pipes.

DIRECTIONS FOR USE:
IT IS A VIOLATION OF FEDERAL LAW TO INCONSISTENT WITH ITS LABELING.

1. Use at night before retiring.
 2. Pour 1/3 of bottle into toilet bowl and flush. Do not flush if you have been used and discard container. You may flush the septic tank drainfield through the drain to carry crystals to root growth in pipes.
 3. Do not apply Root Killer through tub or shower.
- PESTICIDE AND CONTAINER DISPOSAL:**
DO NOT REUSE BOTTLE. WRAP BOTTLE AND DISCARD IN A SAFE PLACE.
HAZARDS TO HUMANS

"DANGER" Causes severe eye and skin irritation if through the skin or inhaled. May cause skin irritation in individuals. Avoid contact with the skin. Wash with dust. Protective clothing, including goggles, should be worn. Wash with soap and water after handling. Remove before reuse. **KEEP OUT OF REACH OF CHILDREN.**

ENVIRONMENTAL PRECAUTIONS:
This pesticide is toxic to some organisms. Do not apply to water.

FIRST AID:
If swallowed, drink plenty of water. Call a doctor. If SWALLOWED, do not induce vomiting. If in eyes, flush with water. If on skin, wash with soap and water. If inhaled, get fresh air. No damage to clothing. EPA Reg. No. 100-100-01

ROEBIC
25 Contain