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11-19-2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

NOV 19 2010

Ms Maria K. Jackson
Agent for Roebic Laboratories, Inc
25 Connair Road
Orange, CT 06477

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Registrant:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated October 6, 2010 for:

EPA Registration 7792-1 Roebic k-77 Root Killer

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-5335 or Eleanor Thornton of my staff at 703-305-6799.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Mastradone".

Paul Mastradone, Acting Leader
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 7792-1	2. EPA Product Manager Tony Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Roebic K-77 Root Killer	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) Roebic Laboratories, Inc. 25 Connair Road Orange, CT 06477 <input type="checkbox"/> Check if this is a new address	6. Expedited Review . In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION NOV 19 2010
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

"Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes" Unit Packaging wgt. No. per container		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Package wgt No. per container			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2 lb		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Marla K. Jackson	Title Agent for Roebic Laboratories, Inc.	Telephone No. (Include Area Code) 972-939-8390

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature 	3. Title Agent for Roebic Laboratories, Inc.
4. Typed Name Marla K. Jackson	5. Date 10/06/2010

D# 441099

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Brazos Associates, Inc.®

1806 Auburn Drive • Carrollton, Texas 75007-1451

Phone: 972-939-8390 • Facsimile: 972-939-8370

E-mail: marla@bai.us.com

By Courier Service

October 10, 2010

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attn: Tony Kish
Product Manager 22

Dear Mr. Kish:

Subject: *Label Notification*
Roebic K-77 Root Killer
EPA Reg. No.: 7792-1

This submission is being made on behalf of our client, Roebic Laboratories, Inc. Per my recent phone conversation with Mr. Paul Mastradone in response to the Agency's letter of July 26, 2010, we are re-submitting the attached Notification to revise labeling as requested in PR-Notice 2007-4. Our previous submission date of May 24, 2010 was denied as Section - III of the Application for Pesticide Form was not filled out. The Agency noted that they made numerous attempts to contact us to correct this, but only one email was sent and before we could respond, the letter of July 26, 2010 was received. Please note above all contact information.

You will find with this submission, Section - III of the Application for Pesticide Form completed. Also, in reference to the Agency's letter of July 26, 2010, Roebic's other product registration "Roebic Root EndZ" EPA Reg. No. 7792-5, will not be re-submitted as the product will be discontinued. As your workload and time allows, we would greatly appreciate your reviewing and accepting this application as soon as possible as we are coming upon the deadline for compliance with PR-Notice 2007-4.

One (1) copy of draft labeling is attached with the changes underscored.

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NOTIFICATION

NOV 19 2010

[FRONT LABEL PANEL]

ROEBIC®

K-77

DESTROYS ROOTS

ROOT KILLER

For Sewer [& Septic] Pipes

[Optional proposed text on this label appears in brackets - the final label may include some or all of the optional text]

ACTIVE INGREDIENT:

Copper sulfate pentahydrate* 99%

INERT INGREDIENTS:..... 1%

TOTAL:..... 100%

*Metallic copper equivalent, 25.2%

Keep Out of Reach of Children

DANGER

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If in eyes	<ul style="list-style-type: none"> • 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 eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Call 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 do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

See [back][side] panel for additional precautionary statements

Net Wt. 32 oz. (2 lbs.)/908 grams

[BACK/SIDE LABEL PANEL]

ROEBIC® K-77 ROOT KILLER

ROEBIC Root Killer kills existing roots in pipes. Retreatments at 6 to 12 month intervals may be necessary to control new or abnormally heavy root intrusion. Works year round without harming surrounding trees, ground cover or natural bacteria content of septic tanks and cesspools. Safe for all plumbing and plastic pipes.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

1. Use at night before retiring.
2. Pour 1/3 of bottle into toilet bowl and flush. Immediately repeat this step until all of the product has been flushed into the sewer pipe. For low-flow toilets, additional flushings may be required to completely remove Roebic Root Killer crystals from the toilet bowl to the sewer pipe. You may also add contents directly to the septic tank drainfield through the distribution box. Add sufficient water to carry crystals to root growth in pipes.
3. Do not apply Roebic Root Killer through tub or sink drains.

[NOTE: Not for sale or use in the State of Connecticut][State law does not allow use of this product in sewage systems in the State of Connecticut][or][Not for sale or use][in the California counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma.][Not for use in septic systems in the State of Florida.]
{Note to Agency: Area use restrictions may or may not appear on product sold in states other than Connecticut, California or Florida.}

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a dry place. Avoid storage near food or feed products. Keep away from Children.

Pesticide Disposal and Container Handling: Nonrefillable container. Do not reuse or refill this container. If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[BACK/SIDE LABEL PANEL]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin irritation. Do not get in eyes, on skin, or on clothing. Wear protective eyewear (safety glasses). May be fatal if swallowed. Wash thoroughly with soap and water before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Keep away from children and pets.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not apply to water except as specified on labeling.

EPA Reg. No. 7792-1 EPA Est. 7792-CT-1

Roebic Laboratories, Inc.
P.O. Box 927
25 Connair Road
Orange, Connecticut 06477 USA

[visit www.roebic.com to register for free reminder email]

[UPC BAR CODE]

Revised 10/06/2010
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