

7792-1

10/05/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Roebic Laboratories, Inc.  
c/o Marla K. Jackson  
Brazos Associates, Inc  
106 Auburn Dr  
Carrollton, TX 75007-1451

OCT 05 2011

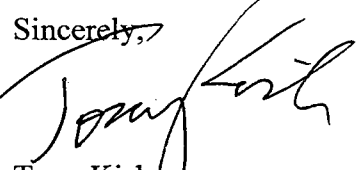
Subject: Application for Pesticide Notification (PRN 98-10)  
Roebic K-77 Root Killer  
EPA Registration No. 7792-1  
Decision No. 455242  
Submission Date: 9/7/11

Dear Ms Jackson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The Agency acknowledges the statement "Not for use in septic systems in the State of Massachusetts."

The label submitted with the application has been stamped "Notification" and will be placed in our records. If you have questions concerning this letter, please contact Dominic Schuler at (703) 347-0260 or via email at [schuler.dominic@epa.gov](mailto:schuler.dominic@epa.gov).

Sincerely,  
  
Tony Kish  
Product Manager 22  
Fungicide Branch  
Registration Division (7504P)



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 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

Amendment - Explain below.  Final printed labels in response to Agency letter dated \_\_\_\_\_

Resubmission in response to Agency letter dated \_\_\_\_\_  "Me Too" Application.

Notification - Explain below.  Other - Explain below.

NOTIFICATION  
OCT 05 2011

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

Notification to add a State of Massachusetts Septic-use restriction statement. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of 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 notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, 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:

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	2. Type of 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" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container

3. Location of Net Contents Information  
 Label  Container

4. Size(s) Retail Container  
2 lb

5. Location of Label Directions  
 on label

6. Manner in Which Label is Affixed to Product  
 Lithograph Paper glued Stenciled  Other \_\_\_\_\_

Section - IV

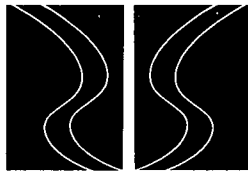
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Marla K. Jackson	Title Agent for Roebic Laboratories, Inc.	Telephone No. (Include Area Code) 972-939-8390
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**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 09-07-11



# Brazos Associates, Inc.®

1806 Auburn Drive • Carrollton, TX 75007-1451  
Phone: 972-939-8390 • Facsimile: 972-939-8370

**By Overnight Courier Service**

September 7, 2011

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***

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This submission is being made on behalf of our client, Roebic Laboratories, Inc. and in accordance with PR-Notice 98-10.

As requested by the State of Massachusetts Department of Environmental Protection (Wastewater Management Program), we have been required to add the following restrictive statement as underlined on page 2 of the attached label:

**“Not for use in septic systems in the State of Massachusetts.”**

Attached with this Notification, please find the following:

1. EPA Form 8570-1
2. One copy of printers proof labeling with the above statement underlined,
3. Letter of Agent Authorization from our client, Roebic Laboratories, Inc.





[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.

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## DIRECTIONS FOR USE

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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.][Not for use in septic systems in the State of Massachusetts.]

*{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

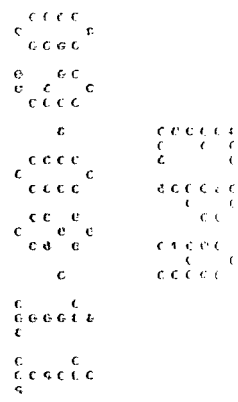
EPA Est. 7792-CT-1

Roebic Laboratories, Inc.

P.O. Box 927

25 Connair Road

Orange, Connecticut 06477 USA



[visit [www.roebic.com](http://www.roebic.com) to register for free reminder email]

**[UPC BAR CODE]**

Revised 09/07/2011

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