



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

August 14, 2020

Tasha Lott  
Regulatory Agent  
Roebic Laboratories, Inc. c/o Landis International  
3185 Madison Highway  
P.O. Box 5126  
Valdosta, GA 31603-5126

Subject: Registration Review Label Mitigation for Copper Compounds  
Product Name: ROEBIC K-77 ROOT KILLER  
EPA Registration Number: 7792-1  
Application Date: 02/1/2019  
Decision Number: 553388

Dear Tasha Lott:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Copper Compounds Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

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If you have any questions about this letter, please contact Darius Stanton by phone at 703-347-0433, or via email at [Stanton.darius@epa.gov](mailto:Stanton.darius@epa.gov).

Sincerely,

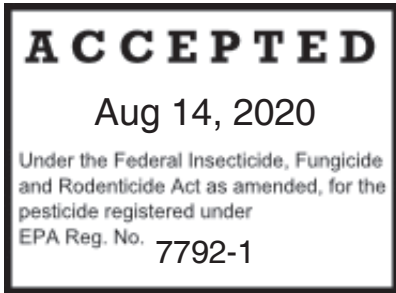
A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

COPPER	GROUP	NOT CLASSIFIED	HERBICIDE
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[FRONT LABEL PANEL]



**ROEBIC® K-77**  
**ROOT KILLER**  
**DESTROYS ROOTS**  
 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\* (CAS No. 7758-99-8)..... 99%

**OTHER INGREDIENTS:**..... 1%

**TOTAL:** .....100%

\* Metallic copper equivalent, 25.1%

**KEEP OUT OF REACH OF CHILDREN**  
**DANGER**

<b>FIRST AID</b>	
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"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed:	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing:	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage. For emergency assistance, please call toll free 1-800-424-9300.	

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

Net Wt. 32oz. (2lbs.)/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. No more than two applications per calendar year. 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  $\frac{1}{3}$  of bottle (0.67 lbs. product/0.17 lbs. metallic copper) 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 K-77 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 2 to 3 gallons of water to carry crystals to root growth in pipes.
3. Do not apply Root Killer through tub or sink drains.
4. Do not apply this product in a way that will contact adults, children or pets either directly or through drift.

Do not apply more than maximum annual application rate of 1 lb. metallic copper (4 lbs. product) per linear foot per year.

[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.

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER: Corrosive.** Causes irreversible eye damage. May be fatal if swallowed. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

#### **ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and aquatic invertebrates and may contaminate water through runoff. For terrestrial uses, do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

**Fish Advisory Statement** - This copper product is toxic to fish and aquatic organisms. Unlike most organic pesticides, copper is an element and will not break down in the environment and will therefore accumulate in sediment with repeated applications. Copper is a micronutrient, but its pesticidal application rate exceeds the amount of copper needed as a nutrient.

**Stormwater Advisory Statement** - This product may be applied for the purposes of root intrusion control in storm drains or storm sewers that can discharge directly or indirectly into ephemeral or permanent waterbodies. This product must not be used in any municipal or public storm sewer or "MS4" system, or any storm drain system otherwise covered under an NPDES MS4 discharge permit. Copper will accumulate with repeated applications in the waterbodies to which treated storm drains/sewers discharge.

**To the extent possible**, avoid simultaneous treatments of multiple drain systems that discharge to the same waterbody. Staggering applications to individual stormwater collection points to allow interceding storm events to clear the product from previously treated drains can help reduce the impact to aquatic organisms in receiving waterbodies. Development of and adherence to, a pesticide management plan for storm drains is encouraged.

EPA Reg. No. 7792-1

EPA Est. No. 7792-CT-1

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25 Connair Road  
Orange, Connecticut 06477 USA

20190201 – Label Amendment (Copper ID) TGL  
20190408 – EPA Requested Changes (Copper PID) TGL