



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 29, 2020

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

Subject: Notification per PRN 98-10 – Update the manufacturer on label
Product Name: ROEBIC FOAMING ROOT KILLER
EPA Registration Number: 7792-7
Application Date: January 29, 2020
Decision Number: 559863

Dear Tasha Lott:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. 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 label submitted with the application has been stamped “Notification” and will be placed in our records.

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.

If you have any questions, you may contact please contact James Orrock by email at orrock.james@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", enclosed in a simple oval scribble.

Kable Bo Davis
Acting Senior Advisor
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Roebic Foaming Root Killer

[OPTIONAL: ONE OR MORE OF THE FOLLOWING STATEMENTS MAY APPEAR ON THE 1, 2, 4, AND 40 POUND CONTAINERS]

*[Kills roots in Sanitary [and Storm] Sewers]
[Self-Foams on Contact with Water]
[Inhibits New Root Growth]
[Does Not Contain Copper]*

Active Ingredient:
Dichlobenil: (2,6-dichlorobenzonitrile) 0.55%
Other Ingredients: 99.45%
Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [Side][Back] Panel for Additional Precautionary Statements

EPA Reg. No. 7792-7
EPA Est. No. 48520-CT-2

Roebic Laboratories
25 Connair Road, P.O. Box 927
Orange, CT 06477

[Manufactured for:
Roebic Laboratories, Inc.
25 Connair Road, P.O. Box 927
Orange, CT 06477]

[Manufactured by:
Phoenix Products Co.
970 Napco Drive
Terryville, CT 06786]

NOTIFICATION

7792-7

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

11/29/2020

[OPTIONAL: Telephone: 203-795-1283]

[Optional placement of statement: On Front/Back/Side and or [inside] label]

ROEBIC FOAMING ROOT KILLER contains Dichlobenil which kills the roots and prevents new growth. ROEBIC FOAMING ROOT KILLER can be used in toilets with septic systems. Dichlobenil is readily absorbed on organic and inorganic colloids of sludge and clay in pipe joints providing residual control of root regrowth by inhibiting the development of actively dividing meristem cells in root tips. New root growths formed outside the pipe joints are retarded or inhibited in growth when they come in contact with Dichlobenil inside the pipe. ROEBIC FOAMING ROOT KILLER self-foams on contact with water. The foam acts as a carrying agent, putting the active ingredient in contact with the tree roots above the flow.

Roebic Foaming Root Killer is in 2 parts inside each container. Part A and Part B which contains the active ingredient Dichlobenil must both be mixed together as instructed under directions for use.

NET WEIGHT 1, 2, 4, or 40 LBS

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Causes moderate eye irritation. Avoid contact with eyes, or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

FIRST AID	
If in Eyes	<ul style="list-style-type: none">• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For emergency assistance, please call toll free <i>1-800-858-7378</i> .

Personal Protective Equipment (PPE)

Applicators and other handlers, including mixers and loaders, must wear long-sleeved shirt, long pants, shoes plus socks, and chemical resistant gloves. Mixers and loaders must also wear a chemical-resistant apron.

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
Users should: <ul style="list-style-type: none">• 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

For terrestrial uses, do not use near a well or where drinking water is stored. Do not apply directly to water or to areas where surface water is present or to inter tidal areas below the mean high water mark. Do not contaminate water when disposing of equipment, wash water or rinsate. 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 groundwater contamination.

Physical and Chemical Hazards

Do not use with or store near oxidizing agents.

[THE FOLLOWING STORAGE AND DISPOSAL LANGUAGE WILL APPEAR ON 1 POUND CONTAINERS USED BY CONSUMERS/HOMEOWNERS:]

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a dry place. Do not store near food or feed.

Pesticide Disposal and Container Handling: Nonrefillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling, if available.

If partially filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

[THE FOLLOWING STORAGE AND DISPOSAL LANGUAGE WILL APPEAR ON 1, 2, AND 4 POUND RIGID CONTAINERS USED BY COMMERCIAL APPLICATORS – ROOTER COMPANIES:]

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a dry place. Do not store near food or feed.

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: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Then offer for recycling if available or puncture and dispose of in a sanitary landfill or by incineration.

[THE FOLLOWING STORAGE AND DISPOSAL LANGUAGE WILL APPEAR ON 40 POUND BAGS:]

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a dry place. Do not store near food or feed.

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: Completely empty bag into application equipment. Do not reuse or refill this container, then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration.

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read the following directions for use thoroughly before application.

When used in inhabited buildings (residences, offices, hospitals, etc.), windows must be open or an exhaust fan must be operating during application.

Do not use in potable water systems. Do not use in storm, field, or other drains unless effluent is treated in a sanitary sewer system.

[THE FOLLOWING DIRECTIONS FOR USE WILL APPEAR ON 1 POUND CONTAINERS:]

NOT FOR USE IN SEPTIC SYSTEMS IN THE STATE OF FLORIDA

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 area during application.

Application Method for Sewer Lines that have Root Problems:

Residential 4" sewer lines, utilize a 1 lb container: ADD ENTIRE CONTENTS of a 1 lb container to toilet bowl. Flush immediately to avoid foam overflowing bowl. Flush a second time to push foam completely into sewer line, and a third time if you have a 1.6 gallon low flow toilet. Restrict water usage for four to six hours. Do not apply through sink or tub.

[OPTIONAL: THE FOLLOWING TWO PARAGRAPHS MAY APPEAR ON 1 POUND CONTAINERS SOLD AT RETAIL LOCATIONS FOR RESIDENTIAL USE:]

[Application Method for Root Control Along Sidewalks and Driveways:

To inhibit the entry of roots beneath pavement structures and the resulting damage caused by root growth, cut a 3" or deeper edging along the structure and pour 2 oz. per foot of Roebic Foaming Root Killer into it in a thin strip. Then cover the edged area with soil.

Immediately following application, thoroughly water-in Roebic Foaming Root Killer. Repeat annually to prevent root growth near the surface, along sidewalks and driveways. Do not enter or allow workers to enter the treated area until Roebic Foaming Root Killer is thoroughly watered in and the treated soil has dried.]

[Application Method for Root Control In Between Tree Roots and Sewer Lines- Root Proofing:

To prevent long term root growth from the tree into sewer lines, bore a series of small holes, 2 feet apart, into the ground near the offending tree or outside the sewer joints using water or mechanical boring equipment. Add 4 oz. of Roebic Foaming Root Killer per hole and fill with soil. Be sure the holes location and depth is directly between the offending tree's roots and sewer line. Immediately following application, thoroughly water in Roebic Foaming Root Killer. Repeat annually to prevent root growth in between trees and roots and sewer lines. Do not enter or allow workers to enter the treated area until Roebic Foaming Root Killer is thoroughly watered in and the treated soil has dried.]

[THE FOLLOWING DIRECTIONS FOR USE WILL APPEAR ON 2 POUND CONTAINERS:]

NOT FOR USE IN SEPTIC SYSTEMS IN THE STATE OF FLORIDA

[Application Methods by Commercial Applicators [- Rooter Companies] for Sewer Lines that Have Root Problems:

Residential 4" sewer lines up to 50ft. utilize a 2 lb. container. Add entire dry contents of a 2 lb. container into a pail or bucket and mix the two components that were in the container thoroughly. Do not add any water or liquid to the mixture. A proper mixture has been achieved when both chemical parts A and B form a tan mixture of white and brown chemicals. This process should take approximately two minutes. Then slowly pour the Roebic Foaming Root Killer mixture into the toilet bowl or a sewer clean out if available. When applying into the toilet, make sure to flush immediately after emptying the contents into the bowl. This will help avoid the foam overflowing the bowl. Make sure that when you are pouring the chemical into the application site you do not create a splash which could come in contact with user's eyes. When applying into a sewer clean out, flush the toilet one time or up to 6 times for 1.6 gallon low flow toilets, or add 5-10 gallons of water behind it to push the foam completely through the sewer line. Restrict water usage for four to six hours after application.

Alternate application method:

Clear obstructions in the line with rooter cable-augers/cutters so that flow is restored. Attach a Roebic applicator to the end of the auger/cable. This can be a sponge, or a cloth/rag-like material. Run the cable with the attachment down the line past the last obstruction which was cut out. Follow instructions immediately above to apply Roebic Foaming Root Killer. Wait 30 seconds after flushing and then retract the cable.

Alternate application method:

Mix part A into a 5 gallon bucket with 1 cup of water. Add part B and stir with a paint stirring stick or a similar device. The 2 parts will foam and fill the bucket. Before the foam reaches the top of the bucket pour the foam contents into the cleanout where the cable is located. Wait 60 seconds for the foam to travel to the attachment in the line. The foam will float on any water in the line. Withdraw the cable slowly. The attachment will rotate and brush/push the foam onto the pipe and root surfaces and into the joint in which they grew. It is desirable that the foam has as little as possible water mixed in. As it dries it forms a water resistant film similar to paint which will continue to kill roots and prevent re-growth for as long as it is present.]

[OPTIONAL: THE FOLLOWING TWO APPLICATION METHODS MAY APPEAR ON 2 POUND CONTAINERS]

[Application Method for Root Control Along Sidewalks and Driveways:

To inhibit the entry of roots beneath pavement structures and the resulting damage caused by root growth, cut a 3" or deeper edging along the structure and pour 2 oz. per foot of Roebic Foaming Root Killer into it in a thin strip. Then cover the edged area with soil.

Immediately following application, thoroughly water-in Roebic Foaming Root Killer. Repeat annually to prevent root growth near the surface, along sidewalks and driveways. Do not enter or allow workers to enter the treated area until Roebic Foaming Root Killer is thoroughly watered in and the treated soil has dried.]

[Application Method for Root Control In Between Tree Roots and Sewer Lines- Root Proofing [Using Camera Locating Equipment]:

Follow mixing directions immediately above. To prevent long term root growth from the tree into sewer lines, use a video camera to locate roots in the sewer line and mark the location above ground. Bore a series of small holes into the ground directly down to the exterior of the sewer line or outside the sewer joints using water or mechanical boring equipment. Add 4 oz. of Roebic Foaming Root Killer per hole and fill with soil. Install a 2" tube in the hole so that it can be retreated as needed to prevent root regrowth. Immediately following application, thoroughly water in Roebic Foaming Root Killer. Repeat annually to prevent root growth in between tree roots and sewer lines. Do not enter or allow workers to enter the treated area until Roebic Foaming Root Killer is thoroughly watered-in and the treated soil has dried.]

[THE FOLLOWING DIRECTIONS FOR USE WILL APPEAR ON 4 POUND CONTAINERS:]

NOT FOR USE IN SEPTIC SYSTEMS IN THE STATE OF FLORIDA

Application Method for Sewer Lines that Have Root Problems:

Residential 4" sewer lines up to 100 ft. or 6" sewer lines up to 75 ft. utilize a 4 lb container. Add entire dry contents of a 4 lb. container into a pail or bucket and mix the two components that were in the container thoroughly. Do not add any water or liquid to the mixture. A proper mixture has been achieved when both chemicals A and B form a tan mixture of white and brown chemicals. This process should take approximately two minutes. Then slowly pour the Roebic Foaming Root Killer mixture into the sewer cleanout. Make sure that when you are pouring the chemical into the application site you do not create a splash which could come into contact with the user's eyes. Add 5-10 gallons of water behind it to push the foam completely through the sewer line. Do not apply a 4 lbs container through a toilet because of the probability of a foam overflow. Restrict water usage for four to six hours after application.

Alternate application method:

Clear obstructions in the line with roter cable-augers/cutters so that flow is restored. Attach a Roebic applicator to the end of the auger/cable. This can be a sponge, or cloth/rag-like material. Run the cable with the attachment down the line past the last obstruction which was cut out.

Follow instructions immediately above to apply Roebic Foaming Root Killer. Wait 30 seconds after flushing and then retract the cable.

Alternate application method:

Mix part A into a 5 gallon bucket with 1 cup of water. Add part B and stir with a paint stirring stick or a similar device. The 2 parts will foam and fill the bucket. Before the foam reaches the top of the bucket pour the foam contents into the cleanout where the cable is located. Wait 60 seconds for the foam to travel to the attachment in the line. The foam will float on any water in the line. Withdraw the cable slowly. The attachment will rotate and brush/push the foam onto the pipe and root surfaces and into the joint in which they grew. It is desirable that the foam has as little as possible water mixed in. As it dries it forms a water resistant film similar to paint which will continue to kill roots and prevent re-growth for as long as it is present.

[OPTIONAL: THE FOLLOWING MAY APPEAR ON 4 POUND CONTAINERS]

[Application Method for Root Control Along Sidewalks and Driveways:

Follow mixing directions immediately above. To inhibit the entry of roots beneath pavement structures and the resulting damage caused by root growth, cut a 3" or deeper edging along the structure and pour 2 oz. per foot of Roebic Foaming Root Killer into it in a thin strip. Then cover the edged area with soil. Immediately following application, thoroughly water-in Roebic Foaming Root Killer. Repeat annually to prevent root growth near the surface, along sidewalks and driveways. Do not enter or allow workers to enter the treated area until Roebic Foaming Root Killer is thoroughly watered-in and the treated soil has dried.]

[Application Method for Root Control In Between Tree Roots and Sewer Lines- Root Proofing [Using Camera Locating Equipment]:

Follow mixing directions immediately above. To prevent long term root growth from the tree into sewer lines, use a video camera to locate roots in the sewer line and mark the location above ground. Bore a series of small holes into the ground directly down to the exterior of the sewer line or outside the sewer joints using water or mechanical boring equipment. Add 4 oz. of Roebic Foaming Root Killer per hole and fill with soil. Install a 2” tube in the hole so that it can be retreated as needed to prevent root regrowth. Immediately following application, thoroughly water in Roebic Foaming Root Killer. Repeat annually to prevent root growth in between tree roots and sewer lines. Do not enter or allow workers to enter the treated area until Roebic Foaming Root Killer is thoroughly watered-in and the treated soil has dried.]

[OPTIONAL: APPLICATION METHOD FOR CONTAINERS WITH FUNNEL APPLICATOR HEAD]

[2 & 4 lb. Roebic Foaming Root Killer Jars with Funnel

1. Unscrew lid from top of container.
2. Take the mixing funnel/applicator and put the wide threaded end into the opening where the lid was in the square container.
3. Rotate the mixing funnel/applicator clockwise screwing the mixing funnel into the square container so that it fits tightly.
4. Grasping the bottom of the square container and the narrow end of the mixing funnel applicator, (putting a hand over the mixing funnel/applicator cap which is located at the narrow end of the mixing funnel/applicator), rock the square container with the mixing funnel/applicator attached, back and forth for approximately one minute allowing the two dry components of Roebic Foaming Root Killer to go into the funnel and then back into the square container several times.
5. After the one minute mixing process you may then take the cap off the narrow end of the mixing funnel/applicator and pour the entire contents of the dry product mixture through the mixing funnel/applicator directly into a sewer clean-out or toilet bowl if a sewer clean-out is not available.
 1. 2lb. jar will treat approximately 50ft. of 4-inch pipe
 2. 4lb. jars will treat approximately 100ft. of 4-inch pipe or 75ft. of 6-inch pipe.
 - 1.Put no more than 2lbs. of Roebic Foaming Root Killer in a toilet bowl to minimize possibility of foam overflow!
 - 2.When applying into a sewer clean-out, flush the toilet two times (or up to 6 times for 1.6 gallon low flow toilet) or add 5-10 gallons water into the clean-out to push the foam completely down through the sewer line.
 - 3.When applying into the toilet make sure to flush the toilet and add the dry mixture into the toilet bowl as the water is going down the drain.
 - 4.It is suggested that when doing a toilet application, that you have a 5 gallon bucket filled with water readily available to further push the foam down the toilet drain if the foam comes back up the drain. This will help avoid the foam overflowing the bowl.
 - 5.Restrict water usage for 4-6 hours after application.]

[THE FOLLOWING DIRECTIONS FOR USE WILL APPEAR ON BAGS INSIDE 40 POUND PACKAGE:]

NOT FOR USE IN SEPTIC SYSTEMS IN THE STATE OF FLORIDA

[OPTIONAL: THE FOLLOWING APPLICATION METHOD MAY APPEAR ON THE 40 POUND PACKAGE]

[Directions for FDU 100 Method

1. **Preparing for Application.** After determining the correct Orifice size for the FDU take the FDU 100 along with the Roebic Foaming Root Killer to the upstream manhole, where the Roebic Foaming Root Killer application will begin. Place the cleaner hose with cleaner nozzle into downstream manhole, as in normal operation, and send the hose with nozzle to the upstream manhole where the Roebic Foaming Root Killer application will begin. Once the cleaner hose has reached the upstream manhole, pull the hose out of the manhole and lay it on top of the ground.

You should now have your cleaner hose, Roebic Foaming Root Killer bags, FDU 100 with Foam Dispersal Nozzle, Plastic Locking Pin, Transfer Tube and Rubber O-Rings at the upstream manhole where the Roebic Foaming Root Killer application will begin.

Suggestions: To prevent having to enter a manhole to retrieve the cleaner hose, It is recommended that a Single Wire Hydraulic hose, 15-20 feet in length, 3/4" or 1" in diameter, be used as a leader hose which can then be attached to the cleaner hose. Attach the cleaner nozzle to the leader hose and send it to the upstream manhole, then use a long pole with a hook on the end to pull the leader hose out of the manhole. This makes retrieval of the cleaner hose much easier and does not require that someone enter the manhole to retrieve the hose. Another suggestion is that the cleaner operator introduces slack in the cleaner hose, which will make it easier to retrieve at the upstream manhole.

2. **Mixing the Roebic Foaming Root Killer.** Open the Roebic Foaming Root Killer box which contains a 40lbs bag of Roebic Foaming Root Killer. The FDU 100 is designed to hold the 40lbs bag of Roebic Foaming Root Killer which is sufficient to treat up to 400 ft. of 6-18" pipe. Take the Roebic Foaming Root Killer bag and remove the plastic tie in the middle of the bag which separates the two dry components, marked as chemical A and the chemical B. Be careful not to puncture or tear the bags during this process. After you have removed the plastic tie, grab each end of the bag and begin to mix the chemicals by shaking the bag vigorously from the side to side. A proper mixture has been achieved when both chemicals A and B form a tan mixture of the chemicals. This process should take approximately two minutes.

WARNING: A carbon dioxide (CO₂) buildup will occur during the mixing process. In the event that the bag should become so full of CO₂ gas that it may break, you should open a small hole in the end of the bag to release the gas, then continue the mixing process until you achieve a proper mixture.

3. **Attaching the Transfer Tube.** After a proper mixture has been achieved, open the end of the narrow part of the bag with either scissors or a knife. Open just the end where the bag has been sealed. Take the Transfer Tube which has a single groove at one end and two grooves at the other end, and insert it into the opening you have created, single groove end first. Then place the rubber O-rings over the bag and into the grooves which the bag material is covering, leaving one groove exposed and uncovered on the outside of the bag. The exposed groove will be used in locking the Transfer Tube into the FDU 100.
4. **Putting Roebic Foaming Root Killer into the FDU 100.** You should now have a bag with the Roebic Foaming Root Killer mixed to form a tan color and a Transfer Tube attached to the narrow end of the chemical bag. Take the Transfer Tube and slip it into the FDU 100 where the Foam Dispersal Nozzle fits.

Take the plastic locking pin and insert it into the locking hole. Push the Plastic Locking Pin in as far as it will go. Lift the bag slowly, letting the Roebic Foaming Root Killer flow through the Transfer Tube into the FDU 100. Tap both the Roebic Foaming Root Killer bag and the FDU 100 occasionally to make sure you have proper flow and that the product is settling into the FDU 100. After completion of the transfer of Roebic Foaming Root Killer to the FDU 100, pull out the Plastic Locking Pin and remove the Transfer Tube from the FDU 100. Then insert the Foam Dispersal Nozzle into the FDU 100 and lock it into place with the Plastic locking pin. Remove the rubber O-rings from the Transfer Tube out of the narrow end of the bag: Be sure to save your Transfer Tube and rubber O-rings for future applications.

5. **Application.** The FDU 100 should now be filled with 40 pounds of Roebic Foaming Root Killer. Attach the cleaner hose to the Inlet End Cap of the FDU 100. Slowly reel in the cleaner hose while lowering the FDU 100 into the manhole. Suggestion: Attaching a string to the Foam Dispersal Nozzle end of the FDU 100 will enable the worker at the upstream manhole to lower the FDU 100 into the hole, while the cleaner operator is pulling the cleaner hose back slowly, without entry, while the operator is slowly retrieving the cleaner hose. The string should be attached in such a manner that it will not hang up in the pipe during the foam spray application. Once the FDU 100 is placed in the hole, the cleaner operator should be signaled to start the water, and only run the cleaner at an engine idle speed. The worker at the upstream manhole should verify that foam is emitting from the nozzle. Once the foam dispersal has been verified, the FDU 100 should be pulled through the pipe at a speed no greater than 20 feet per minute. The nozzle of the FDU 100 should always be out of the water during the application of Roebic Foaming Root Killer. This will insure that the product is properly dispersed onto the roots. In situations where a high flow is present, it is suggested that the flow be bypassed to keep the nozzle from being submerged or to place the FDU 100 on a skid which will lift the nozzle above the flow level. (The skid would be similar to what is used for a camera or cleaning nozzle).
6. **Finished Application.** The Roebic Foaming Root Killer application is finished when the FDU 100 reaches the downstream manhole. The cleaner is now turned off and the FDU 100 is retrieved from the downstream manhole. Smaller size pipe requires gently shaking and pulling by the operator at ground level, in order to retrieve the applicator. After the FDU 100 is removed, unhook the cleaner hose and detach the Foam Dispersal Nozzle. Then wash out any excess Roebic Foaming Root Killer with a hose, making sure that the wash water goes directly into the sewer through the open manhole. You are now ready for another application.]

Direct Application Method

Roebic Foaming Root Killer is a very flexible product, not only can it be applied in conjunction with a Jetter Truck, but it can also be applied by pouring the Roebic Foaming Root Killer directly into the sewer or storm line.

1. A 40lbs Roebic Foaming Root Killer box contains one bag of 2 parts separated by a tie in the middle of pre-packaged chemical. Each 40lbs bag contains the two components which make up Roebic Foaming Root Killer. These two components are separated by a center tie.
2. Roebic Foaming Root Killer is a two component chemical. Both components should be mixed so that proper foaming action is created. This can be done by releasing the center tie which separates the two components and shaking the bag back and forth until the brown and white components are thoroughly mixed.
3. To effectively treat 300 ft. of 8-10 inch line, you must pour 40 pounds of the Roebic Foaming Root Killer directly into the manhole. Then follow with 25-30 gallons of water to create the foaming action. The foam will move down the line with the flow, leaving a residue throughout the pipe and coating the roots with the root killing chemical.

[OPTIONAL: THE FOLLOWING TWO APPLICATION METHODS MAY APPEAR ON THE 40 POUND PACKAGE]

[Application Method for Root Control Along Sidewalks and Driveways:

Follow mixing directions immediately above. To inhibit the entry of roots beneath pavement structures and the resulting damage caused by root growth, cut a 3" or deeper edging along the structure and pour 2 oz. per foot of Roebic Foaming Root Killer into it in a thin strip. Then cover the edged area with soil. Immediately following application, thoroughly water-in Roebic Foaming Root Killer. Repeat annually to prevent root growth near the surface, along sidewalks and driveways. Do not enter or allow workers to enter the treated area until Roebic Foaming Root Killer is thoroughly watered-in and the treated soil has dried.]

[Application Method for Root Control In Between Tree Roots and Sewer Lines- Root Proofing [Using Camera Locating Equipment]:

Follow mixing directions immediately above. To prevent long term root growth from the tree into sewer lines, use a video camera to locate roots in the sewer line and mark the location above ground. Bore a series of small holes into the ground directly down to the exterior of the sewer line or outside the sewer joints using water or mechanical boring equipment. Add 4 oz. of Roebic Foaming Root Killer per hole and fill with soil. Install a 2" tube in the hole so that it can be retreated as needed to prevent root regrowth. Immediately following application, thoroughly water in Roebic Foaming Root Killer. Repeat annually to prevent root growth in between tree roots and sewer lines. Do not enter or allow workers to enter the treated area until Roebic Foaming Root Killer is thoroughly watered-in and the treated soil has dried.]

Root Proofing dose per hole 4 oz per 4" line x 50-100'

8 oz per 8" line

12 oz per 12" x 300'

1 lb per 16" x 300'

1.25 lbs per 20" x 300'

1.5 lbs per 24" line 2 lbs per 36" line

Add 50% for 450' lines or longer

Storm Line Application

Roebic Foaming Root Killer may also be applied in storm lines by the Direct Application Method described above.

[OPTIONAL: THE FOLLOWING STORM LINE APPLICATION USING THE FDU 100 METHOD MAY APPEAR ON THE 40 POUND PACKAGE]

[Roebic Foaming Root Killer may be applied in a storm line by utilizing the FDU 100 method described above. In pipes with sizes larger than 18" or in high flow situations the FDU 100 should be placed on a skid similar to what is used for a camera or cleaning nozzle. This will ensure that a sufficient amount of chemical is getting on the roots.]

Utilize the following rates for pipe sizes larger than 10":

4-40 lbs Boxes per 12" x 300'

6-40 lbs Boxes per 16" x 300'

8-40 lbs Boxes per 20" x 300'

10-40 lbs Boxes per 24" x 300'

12-40 lbs Boxes per 36" x 300'

Add 50% for 450' lines or longer

NOTICE: EXCEPT AS SPECIFICALLY SET FORTH ON THIS LABEL AND TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER SHALL NOT BE LIABLE FOR ANY LOSS, INJURY OR

DAMAGES TO PERSONS OR PROPERTY RESULTING FROM ANY USE OF THIS PRODUCT NOT IN COMPLIANCE WITH THE DIRECTIONS ON THIS LABEL, NOR SHALL MANUFACTURER BE LIABLE FOR ANY DIRECT, INDIRECT, SPECIAL, CONSEQUENTIAL, INCIDENTAL, OR PUNITIVE DAMAGES OF ANY KIND SUSTAINED BY THE PURCHASER OR USER OF THIS PRODUCT. THERE ARE NO IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO THE IMPLIED WARRANTY OF MERCHANTABILITY OR OF FITNESS FOR THE PARTICULAR PURPOSE.

MANUFACTURER'S OBLIGATION ON ANY CLAIM IS LIMITED TO THE REPLACEMENT OF ANY DEFECTIVE PACKAGE OF ROEBIC FOAMING ROOT KILLER. PURCHASERS AND/OR USERS OF THIS PRODUCT HEREBY WAIVE ANY STRICT LIABILITY OR PRODUCT LIABILITY CLAIMS THEY MAY HAVE OR WHICH MAY ARISE AGAINST THE MANUFACTURER AND/OR SELLER.

[Optional Statement: Visit www.roebic.com to register for free reminder email]

[EPA approval date]

20200129 Additional changes per EPA letter TGL