

199-2-100

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 31 1989

Mr. Robert J. Taylor
 Environmental Protection Agency, 1200
 Pennsylvania Avenue, N.W., Room 1-100
 Washington, D.C. 20460

Dear Mr. Taylor:

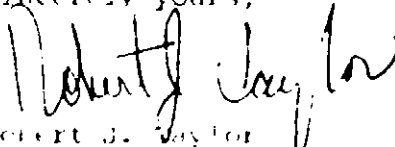
As a result of your letter of April 27, 1989,
 regarding the labeling of the product,
 you have indicated that you are in the process
 of preparing a new label for the product.

The label you are preparing to use for the product will
 be reviewed by the Agency. If the Agency determines
 that the label is acceptable, you will be notified.

The new label must be placed on the product in accordance
 with the instructions on the label.

Please submit five (5) copies of your final printed labeling
 incorporating this amendment before you release the product for shipment.

Sincerely yours,



Robert J. Taylor
 Product Manager (25)
 Registration Division
 Environmental Protection Agency

56276-I-Gileo-LT 18-KENGO-05/26/89-06/06/89-DD-VG-JH-AG
 CONCURRENCES

SYM/JOL	147505C						
SURNAME	J. Taylor						
DATE	5-31-89						

ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAY 31 1969

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, this pesticide
registered under EPA Reg. No.
9993-2

CENTER PANEL

FOAM-COAT VAPOROOTER

A FOAMING HERBICIDE

FOR USE IN LARGE DIAMETER COLLECTION LINES

RIDS THESE LINES OF ROOTS

WILL NOT HARM TREES. NON-SYSTEMIC

A formulation of metam-sodium plus dichlobenil

ACTIVE INGREDIENTS:

Sodium Methyldithiocarbamate (anhydrous)	28.40%
Dichlobenil (2,6 - Dichlorobenzonitrile)	1.73%

INERT INGREDIENTS:

	69.87%
	100.00%

KEEP OUT OF REACH OF CHILDREN

DANGER

CAUSES SKIN IRRITATION

STATEMENT OF PRACTICAL TREATMENT

If on skin: immediately remove contaminated clothing or shoes, and flush with plenty of water. If irritation persists, get medical attention.

If in eyes: flush eyes with water for at least 15 minutes, and get medical attention if irritation persists.

If inhaled: remove to fresh air. If breathing has stopped, start artificial respiration procedures, and get medical attention immediately.

If ingested: if swallowed, give several glasses of water, but do not induce vomiting. Have a physician determine whether to induce vomiting or evacuation of stomach.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 9993-2

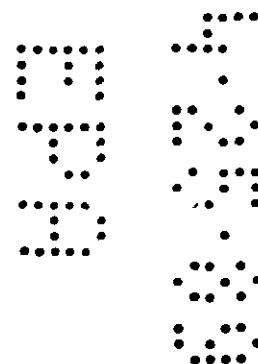
CENTER PANEL (continued)

EPA EST. NO. 279-CA-1

AIRRIGATION ENGINEERING CO. INC.

P.O. Box H, Carmel Valley, CA 93924 -- 408/659 4312

RECOMMENDED FOR USE BY TRAINED PERSONNEL



LEFT PANEL

PRECAUTIONARY STATEMENTS

DANGER

HAZARD TO HUMAN AND DOMESTIC ANIMALS

KEEP OUT OF REACH OF CHILDREN

IMPORTANT! always wash hands, face, and arms with soap and water before smoking, eating, drinking, or toileting. Before removing gloves, wash them with soap and water.

Keep all unprotected persons, children, livestock, and pets away from treated area or where there is danger of drift.

Do not rub eyes or mouth with hands. If you feel sick in any way, STOP work and get help immediately. See Statement of Practical Treatment.

PUT ON ALL REQUIRED SAFETY PROTECTION EQUIPMENT. Gloves should be chemical resistant and of the gauntlet type.

DO NOT USE IN CONFINED AREAS WITHOUT ADEQUATE VENTILATION.

Avoid any entry into manholes or confined areas. When absolutely necessary to enter these areas, be sure to use all safety protection equipment as required by law.

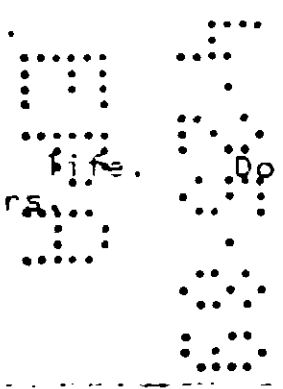
May be harmful if swallowed or inhaled.
Irritating to eyes, nose and throat.
Avoid breathing vapor, mist or dust.
Wash and dry clothing and shoes after use.
Do not get in eyes, on skin, or on clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and other aquatic life. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.



LEFT PANEL (continued)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

STORAGE

-- Do not store near feed or food stuffs. Keep container tightly closed when not in use. Do not store below 33° or above 90°F.

DISPOSAL

Plastic Pail -- Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Plastic Bag -- Completely empty bag into application equipment, then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Do not contaminate water when disposing of equipment washwater. Do not contaminate water, food or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

PRODUCT INFORMATION

FOAM-COAT VAPOROOTER[®] -- is a foamable, surface-active formulation of metam-sodium plus dichlobenil for dilution in water.

FOAM-COAT VAPOROOTER[®] -- is a non-systemic chemical for control of roots in storm lines, sewer mains, drain lines, and other conduits.

FOAM-COAT VAPOROOTER[®] -- may be used as a foaming product with the Foam-Coat process. The Foam-Coat process is to be used in large diameter collection lines where it is uneconomical to fill a line with SANAFAM VAPOROOTER[®] II due to size. For lines below 15-inches in diameter, another foaming application technique and foaming product are needed. Contact Airrigation Engineering Co., Inc. for information.

FOAM-COAT VAPOROOTER[®] -- may be used by the soaking method.

LEFT PANEL (continued)

FOAM-COAT VAPORROOTER[®] is packaged in two separate units within an outer fiberboard container: A plastic bag of dichlobenil herbicide powder and a plastic container holding the FOAM-COAT VAPORROOTER liquid concentrate.

FOAM-COAT VAPORROOTER should not be used to treat roots in storm sewers or other drains unless the waste water will be treated or controlled.

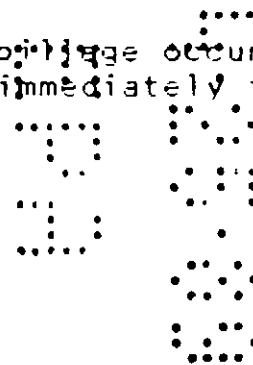
MIXING INSTRUCTIONS

1. Open outer fiberboard container, and remove plastic bag containing the dichlobenil herbicide.
2. Remove plastic inner container containing FOAM-COAT VAPORROOTER liquid.
3. Carefully add contents of plastic bag to the liquid concentrate container of FOAM-COAT VAPORROOTER. MIX THOROUGHLY UNTIL DICHLOBENIL POWDER IS COMPLETELY MIXED.
4. Transfer the mixture into the FOAMAKER solution tank, the holding tank or the manhole, depending on application procedure. The tank should contain the correct amount of water.
5. Rinse container, and add rinse water to contents of solution tank and manhole.
6. Dispose of container in accordance with disposal instruction.

USE SOLUTION PROMPTLY AFTER MIXING. Wash and flush all equipment with water after each day's use.

KEEP OFF DESIRABLE LAWNS AND PLANTS. If excessive spillage occurs on the street or other paved areas near growing plants, immediately flush the spill thoroughly with water at moderate pressure.

5 GALLONS NET 18.9 LITERS
9.78 LBS. WEIGHT PER GALLON



RIGHT PANEL

SPECIFIC DIRECTIONS

FOR USE OF FOAM-COAT VAPORCOATER

A. PREVEY TREATMENT AREA

1. Confirm the line size and length. Evaluate slope, flow, lateral connections, line length, outfall, line obstructions, terrain and other field conditions. A thorough evaluation prior to starting will assure safe and accurate application of FOAM-COAT VAPORCOATER.

B. APPLICATION USING THE FOAM-COATING METHOD

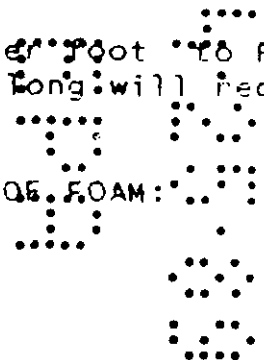
1. DETERMINE THE QUANTITY OF FOAM NEEDED:

From this table, compute the quantity of foam necessary to treat a length of line by multiplying the pipe length by the quantity of foam required per foot of line.

Pipe Diameter	Gallons of Foam /1-foot length	Pipe Diameter	Gallons of Foam /1-foot length
15"	3.30	28"	6.48
16"	3.55	30"	6.97
18"	4.04	32"	7.46
20"	4.53	36"	8.44
21"	4.77	40"	9.42
22"	5.02	42"	9.91
24"	5.51	44"	10.40
26"	5.99	48"	11.38
27"	6.24		

Example: A 24-inch pipe needs 5.51 gallons of foam per foot to Foam-Coat the pipe. Therefore, a 24-inch line 1,000 feet long will require 5,510 gallons of foam to Foam Coat the line.

2. MIX AS FOLLOWS TO PRODUCE THE DESIRED QUANTITY OF FOAM:



RIGHT PANEL (continued)

MIXING INSTRUCTIONS

Total Solution	Water	Foam-Coat Vaporooter	Foam Produced
50 gal	46.2 gal	3.8 gal	150 gal
60 gal	55.5 gal	4.5 gal	900 gal
70 gal	64.7 gal	5.3 gal	1050 gal
80 gal	74.0 gal	6.0 gal	1200 gal
90 gal	83.2 gal	6.8 gal	1350 gal
100 gal	92.5 gal	7.5 gal	1500 gal
200 gal	185.0 gal	15.0 gal	3000 gal

Example: For a FOAMAKER with a 200 gallon tank, you will need to fill the tank two times in order to generate 5,510 gallons. For the first tank load, add 15 gallons of FOAM-COAT VAPOROOTER and 185 gallons of water. This load will product 3,000 gallons of foam. The second load will require 12.5 gallons of FOAM-COAT VAPOROOTER and 155 gallons of water in order to produce 2,510 gallons of foam. These two loads will produce a total 5,510 gallons of foam.

3. APPLY FOAM-COAT VAPOROOTER TO COLLECTION LINES TO BE TREATED.

Insert the foam discharge hose through the entire section of line to be treated. The Foam-Coat Nozzle should be positioned on a skid at least 2-inches above the line flow. Start foam generating equipment, and withdraw the discharge hose at a rate calibrated to Foam-Coat the line.

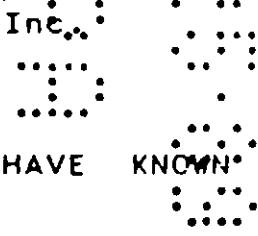
4. USE ONLY SPECIALIZED FOAM APPLICATION EQUIPMENT:

Foam-making generators must produce 15 gallons of foamed FOAM-COAT VAPOROOTER from each gallon of 7.5% solution. FOAMAKER equipment is recommended. FOAMAKER equipment is manufactured for Irrigation Engineering Co., Inc. to our specifications and is available from Irrigation Engineering Co., Inc.

C. APPLICATION USING THE SOAKING METHOD

1. DETERMINE WHICH OF THE COLLECTION LINES HAVE KNOWN ROOT PROBLEMS.

Start with the first manhole section at the upstream end of the line.



RIGHT PANEL (continued)

Caution must be used by operator. Consideration of slope, flow, lateral connections, line obstructions, terrain and other field conditions is necessary for safe operation.

Caution must be used to assure solution does not travel into adjacent structures. If the label and user manual instructions are not followed carefully, Airigation Engineering Co., Inc. will not be held responsible.

2. DETERMINE QUANTITY OF SOLUTION NEEDED.

From this table, compute the quantity of solution necessary to treat a length of line, by multiplying the pipe length by the solution required per foot.

(Pipe lengths) x (Solution per foot) = (Quantity of solution required).

PIPE CAPACITY

Pipe Diameter	Gallons of Solution per 1-foot lengths
4 inches	0.7
6 inches	1.5
8 inches	2.5
9 inches	3.3
10 inches	4.0
12 inches	6.0

Example: An 8" pipe requires 2.5 gallons of solution per foot to fill the pipe. Therefore, 1,000 gallons of solution will fill an 8" pipe 400 feet in length. To compensate for solution which enters laterals or exfiltrates from the pipe, a protection factor of 10% to 25% should be added to calculations.

3. APPLY FOAM-COAT VAPOROOTER BY ONE OF THE FOLLOWING METHODS:

PREMIX METHOD -- Preferred

Obtain holding tank of 1,000 gallon capacity or more. Fill tank with water, observing all water department regulations on backflow devices and other safety requirements. Add FOAM-COAT VAPOROOTER mixture to tank of water using chemical resistant transfer pump, if available, stirring constantly to assure homogenous mixture. Rinse pump thoroughly with clear water.

RIGHT PANEL (continued)

- a) Fill the line with the premixed chemical by pumping or using gravity flow from the holding tank.
- b) Fill the line until the solution level reaches approximately one foot above the top of the pipe being treated. This will establish a hydrostatic head of pressure and evacuate all air pockets.
- c) Retain solution in line for a minimum of one hour for best results. Should a situation occur that requires the chemical to be released before the full hour, generally satisfactory results can be achieved within 30-40 minutes exposure time.

ON-SITE MIXING METHOD -- to be used only if premix method is impractical.

- a) Provide water source at upstream manhole. Use water tank wagon, hydraulic cleaner, or fire hydrant with backwater valve, as a source of water.
- b) Calculate amount of chemical needed for capacity of pipe. Provide chemical at upstream manhole.
- c) Determine approximate rate of water flow from source to be used.
- d) Calculate the rate of chemical flow to produce a 1% solution: 1 gallon of chemical to 100 gallons of water.
- e) Start the water flow.
- f) Pour in the appropriate amounts of chemical to assure a consistent 1% solution throughout the pipe.

4. SPECIAL APPLICATION PROCEDURE:

Situations may be identified where the soaking method would be impractical due to slope, line flow, line condition, line size, etc. When foaming applications are recommended, FOAM-COAT VAPORCOTER for large lines or SANAFOAM VAPORCOTER for smaller lines. Contact Airrigation Engineering Co., Inc. for more information.

RIGHT PANEL (continued)

SPECIAL NOTICE

IRRIGATION ENGINEERING CO., INC. MAKES NO WARRANTY, EXPRESSED OR IMPLIED, INCLUDING THE WARRANTIES OF MERCHANTABILITY AND/OR FITNESS FOR ANY PARTICULAR PURPOSE CONCERNING THIS MATERIAL, EXCEPT THOSE WHICH ARE CONTAINED ON THIS LABEL.

I N N E R L A B E L

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INERT INGREDIENTS 69.87%
100.00%

AIRRIGATION ENGINEERING CO., INC., P.O. BOX H.

CARMEL VALLEY, CA 93924

KEEP OUT OF REACH OF CHILDREN

DANGER

CAUSES SKIN IRRITATION, SEE OTHER LABEL PRECAUTIONS

EPA Reg. No. 9993-2

EPA Est. No. 279-CA-1

5 Gallons Net, Weight Per Gallon 9.78 lbs.

18.9 Liters Net - For Complete Mixture

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. See the outer package for complete labeling.