



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mark J. Sophie
Utility Manufacturing Co., Inc.
700 Main Street
Westbury, NY 11590

— DEC 18 2008

Dear Mr. Sophie:

Subject: Rootaway Root Destroyer
EPA Registration No. 10266-1
Your resubmitted label amendment application dated November 17, 2008

The amendment referred to above, submitted in connection with registration under FIFRA, as amended has been reviewed and is acceptable provided that you submit a final printed label, making the following changes, within 30 days from the date hereon. A copy of the label stamped "Accepted With Comments" is included for your records.

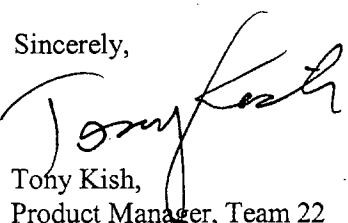
1. Under the 'Directions for Use' section, delete "**UTILITY**" as it is not the Agency recognized product name.
2. Replace the current 'Container Disposal' statement with, "*Nonrefillable container. Do not reuse or refill this container. When completely empty, offer for recycling if available or dispose of box in a sanitary landfill or by other procedures approved by state and local authorities. If partly filled call your local solid waste agency or [registrant must insert toll free number here or website if applicable]*" for disposal instructions."
3. To the 'First Aid' section, add "IF ON SKIN", and "IF INHALED" along with appropriate guidance for each.
4. Above the 'First Aid' statement, delete "**KEEP OUT OF REACH OF CHILDREN**" from the label.
5. Delete "Coveralls" and replace with "Wear" so that it reads, "Wear shoes plus socks, chemical...."
6. In the precautionary statement box above the 'Ingredient Statement', increase the font size of the signal word 'DANGER', and delete "**HARMFUL IF SWALLOWED. CONTAINS COPPER SULFATE.**"

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EPA Registration No. 10266-1

7. Ensure that the font size used on the label is not less than "6 point".
8. Delete 'NEW' from the label statement "NEW CONVENIENT WATER SOLUBLE..." as this claim no longer warrants being described as 'NEW'.
9. Revise the statement "Contents: 4-8 ounce packets", to read "Contents: Four 8 ounce packets."

If you have any questions, please contact Bryant Crowe by phone at (703) 305-0025 or via email at crowe.bryant@epa.gov.

Enclosure

Sincerely,

Tony Kish,
Product Manager, Team 22
Fungicide Branch
Registration Division (7505P)

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

This box contains 4 sealed, water-soluble plastic bags, each containing 8 oz. of UTILITY ROOTAWAY Root Destroyer Crystals. Best results are obtained if all applications of UTILITY ROOTAWAY Root Destroyer are made at night when the smallest amount of water goes through the drainage lines. These water soluble bags can be dropped unopened into a toilet or a main trap (Never into basin, sink or tub). The bag dissolves in two minutes and the crystals can then be flushed into the drainage lines.

As a preventive: To ensure root-free drainage lines, apply an 8 oz. bag of ROOTAWAY Root Destroyer every three weeks during the spring and summer growing season. Follow this by the same treatment once every eight weeks during the remainder of the year. Where root growth has reached the point where drainage is sluggish, eight-ounce applications should be made twice weekly until the condition has been corrected. Follow with preventive treatment as above. Where root growth is so great as to cause complete blockage, have roots removed mechanically for quickest relief. To avoid future clogging, use preventive treatment.

STORAGE AND DISPOSAL:

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

PESTICIDE STORAGE: Store unused product in original container only in a cool, dry area out of reach of children & animals. If container is damaged, place the container in a plastic bag.

PESTICIDE DISPOSAL: IF PARTLY FILLED: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain unless instructed to do so in the "DIRECTIONS".

CONTAINER DISPOSAL: IF EMPTY: Do not reuse this container. Place in a trash or offer for recycling if available.

WARRANTY - CONDITIONS OF SALE

To the extent permitted by applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

10605.P65

KEEP OUT OF REACH OF CHILDREN.

FIRST AID: IF IN EYES: 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 SWALLOWED:** Call a 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. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOTLINE NUMBER: 1-800-535-5053.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

PRECAUTIONARY STATEMENTS: Hazards to Humans & Domestic Animals

DANGER:

- Corrosive. Causes irreversible eye damage and skin irritation.
- Harmful if swallowed • Harmful if absorbed through the skin or inhaled.
- Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.
- Avoid breathing dust. • Avoid contact with skin, eyes or clothing.
- Coveralls, shoes plus socks, chemical resistant gloves made of any waterproof material. Protective eyewear must be worn.
- Wash thoroughly with soap and water after handling.
- Remove contaminated clothing & wash before reuse.

ENVIRONMENTAL HAZARDS:

- This product is extremely toxic to fish and aquatic organisms.
- Don't apply to water except as specified on labeling.

UTILITY
WESTBURY, NY 11590 U.S.A.
www.UtilityChemicals.com

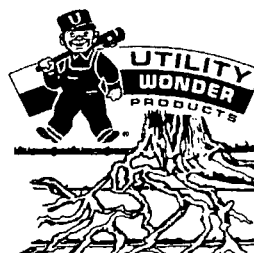


11/14/2008, 9:45 AM

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

DEC 18 2008

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.**



NEW CONVENIENT WATER SOLUBLE PACKAGES

- NO SPILLAGE • NO MEASURING
- NO CONTACT WITH HANDS
- NO GUESSING • EASY TO USE

ROOTAWAY™

ROOT DESTROYER

**KEEP OUT OF REACH OF CHILDREN.
DANGER: HARMFUL IF SWALLOWED.
CONTAINS COPPER SULFATE. SEE BACK
PANEL FOR ADDITIONAL PRECAUTIONS.**

Active ingredient:
Copper Sulfate Pentahydrate..... 99%
Inert Ingredients..... 1%
Total Ingredients..... 100%
EPA Reg. No. 10266-1
EPA Establishment No. 10266-NY-1

- PREVENTS CLOGGED DRAINAGE LINES
- WILL NOT INJURE TREES AND PLANTS
- REMOVES AND PREVENTS ROOT STOPPAGES AND FUNGUS GROWTH.
- SAFE FOR SEWERS, STORM DRAINS, CESSPOOLS & SEPTIC TANKS.

Contents: 4-8 ounce packets ITEM# 10-605
Net Weight: 32 oz. (2 lbs.)-907 g

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