



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Paul Kittelson
EH&S Manager
Qualis Inc.
4600 Park Ave.
Des Moines, Iowa 50321

JUL 12 2004

Subject: DIONNE Copper Sulfate Root Killer - Master Label
EPA Reg. No. 34797-39
Your amendment dated September 29, 2003

Dear Mr. Kittelson:

Further review of the subject label has identified two additional changes that are required in addition to those specified in the Agency's letter dated March 5, 2004:

1. In the FIRST AID block, add the following sentence in the Notes section: "Note to physician: Probable mucosal damage may contraindicate the use of gastric lavage."
2. In the section "Precautionary Statements / Hazard to Humans and Domestic Animals", replace the sentence "Causes severe eye and skin irritation" with "Causes irreversible eye damage. Causes severe skin irritation."

Please submit one copy of each final printed sublabel that incorporates the required changes before the product is released for shipment.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

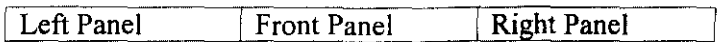
Sincerely,

A handwritten signature in black ink that reads "Cynthia Giles-Parker".

Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure

Generic label layout:



(Front Panel)

DIONNE Copper Sulfate Root Killer
 Controls root growth in sewer pipes

KEEP OUT OF REACH OF CHILDREN DANGER

ACTIVE INGREDIENT:

Copper Sulfate (Pentahydrate)*..... 99%

INERT INGREDIENTS: 1%

*Metallic Copper Equivalent 25.2%

See Insert for specific/additional use directions

See side panel for use, directions and additional precautionary statements

EPA Reg. No 34797-39

EPA Est. No. 34797-IA-02

NET Weight XX LBS (XX Kg)

Distributed by:
 Dionne Products
 Des Moines, IA 50321

**ACCEPTED
 with COMMENTS
 In EPA Letter Dated:**

JUL 12 2004

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

34797-39

(Left Panel)

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **To open:** Place coin in groove, pry and lift lid off. **To close:** Place lid on container - press edges down, snapping lid on. **Residential or Household Sewer Systems:** In household sewers, use 2 pounds of Dionne Copper Sulfate Root Killer twice yearly. To add Root Killer to sewer line, pour about ½ pound into the toilet bowl nearest to sewer line and flush, repeating process until the recommended dose has been added; or remove cleanout plug and pour entire recommended quantity directly into the sewer line, replacing plug and flush toilet several times. **Note:** Do not apply Root Killer through sink or tub drains as it will corrode these metal drains. If system is equipped with a septic tank, Root Killer will precipitate in the septic tank and little will pass into the absorption drain field. To treat drain field pipes, add 2 pounds of Root Killer to distribution box located between the septic tank and the drain field. If distribution box does not have an opening, it would be advisable to install a cleanout plug opening into the outlet pipe from the septic tank leading to the drain field for effective root control in the drain field pipes.

STORAGE AND DISPOSAL Do not contaminate water, food, or feed by storage or disposal. **Pesticide Storage:** Store product in a secure, dry place. Store product only in original container. Keep product dry, as product is water-soluble. Store pesticide separately to prevent cross-contamination of other pesticides, fertilizers, food and feed. **Pesticide Disposal: 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 (or toll free 1-800-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by these label instructions.

(Right Panel)

**Precautionary Statements
Hazard to Humans & Domestic Animals**

DANGER: Causes severe eye and skin irritation. Harmful if absorbed through the skin or inhaled. May cause skin sensitization reactions in certain individuals. Avoid contact with the skin, eyes, or clothing. Avoid breathing dust. Protective clothing, including goggles, should be worn. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Environmental Hazard Statements

This pesticide is toxic to fish. Direct application of copper sulfate to water may cause a significant reduction in population of aquatic invertebrates, plant, and fish.

First Aid	
If in eyes:	Hold eyes open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue to rinse eyes. Call a poison control center or doctor for treatment advice.
If on skin or clothing:	Take off contaminated clothing. Rinse immediately with plenty of water for 15 - 20 minutes. Call a poison control center or doctor for treatment advice.
If inhaled:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth.
If swallowed:	Call 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.
Notes: Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	