

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 21 2001

Margery M. Exton
Florida Petrochemicals, Inc.
1020 Hiawatha Blvd. West
Syracuse, NY 13204

Dear Ms. Exton:

Subject: Revised Labeling - Revised Personal Protective Equipment
For Use in Closed Systems
Razoroooter II
EPA Registration No. 64898-8
Your Submission Dated May 26, 2000

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) In order to bring this product into compliance with PR Notice 2001-1, revise the dermal, eye, and inhalation statements in the First Aid section to read as follows:

“IF ON SKIN OR SWALLOWED:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.”

“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 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 possible.
- Call a poison control center or doctor for further treatment advice.”

DK:305-7546:HB/PM23

		CONCURRENCES						
SYMBOL	7505C							
SURNAME	D. KENNY							
DATE	3/21/2001							

- 2) Within the section for Personal Protective Equipment, revise the exception for use in closed systems to read "EXCEPTION: If a closed system is used during mixing, dilution, product transportation, and cleaning, *and* applications will be made to closed, subsurface sewers and drains, *and* the product will be diluted in the closed system with water at a ratio of at least 1 part product to 50 parts water prior to use, then applicators, mixers, loaders, and other handlers may wear...".

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

RAZOROOTER II™

For use to control tree root intrusions in
sanitary sewers, storm drains, and other drainage systems.

ACTIVE INGREDIENT:

Diquat dibromide [6,7-dihydrodipyrido (1,2-a:2',1'-c) pyrazinedium dibromide].....	By Weight 37.3%
OTHER INGREDIENTS	62.7%
TOTAL	100.0%

This product contains 2-lbs. diquat cation per gal. as 3.73 lbs. salt per gal.

KEEP OUT OF REACH OF CHILDREN WARNING FIRST AID

IF SWALLOWED: Give water or milk to drink and induce vomiting by inserting finger in throat. Take person and product container to the nearest hospital or physician fast. **PROMPT TREATMENT IS ESSENTIAL TO COUNTERACT POISONING** and should be initiated before signs and symptoms of injury appear.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

NOTE TO PHYSICIAN: Call HIS: 1-800-228-5635, Ext. 169 at any hour to obtain toxicology information and a diquat analysis. To be effective, **treatment for diquat poisoning must begin IMMEDIATELY.** Treatment consists of binding diquat in the gut with suspensions of activated charcoal or bentonite clay, administration of cathartics to enhance elimination and removal of diquat from the blood by charcoal hemoperfusion or continuous hemodialysis.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL HIS 1-800-229-5735, Ext. 169

See Side Panel For Additional Precautionary Statements

EPA Reg. No. 64898-8
EPA Est. No. _____

Made in U.S.A.
Florida Petrochemicals Inc. (FPI)
1020 Hiawatha Blvd. West
Syracuse, NY 13204

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

Net Contents _____

MAR 21 2001

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

64898-8

PRECAUTIONARY STATEMENTS

Hazards to Humans

WARNING

May be fatal if absorbed through skin. Harmful if swallowed or inhaled. Causes substantial but temporary eye injury. Causes skin irritation. Contact with irritated skin, or a cut, or repeated contact with intact skin may result in poisoning. Do not get in eyes or on skin or clothing. Avoid breathing vapor or spray mist.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Either coveralls over a short-sleeved shirt and short pants, or coveralls over a long-sleeved shirt and long pants.
- Waterproof gloves.
- Chemical-resistant footwear plus socks.
- Protective eyewear.
- Chemical-resistant apron when cleaning equipment, mixing or loading.

The following protective equipment must be immediately available at all times for each person operating and monitoring application equipment.

- A dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P or HE filter.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

EXCEPTION: If a closed system is used during mixing, product transportation, and cleaning, and applications will be made to closed, subsurface sewers and drains, and the product will be diluted with water at a ratio of at least 1 part product to 50 parts water prior to use, applicators, mixers, loaders, and other handlers may wear:

- Short sleeved shirt and long pants
- Shoes plus socks
- Waterproof gloves
- Protective eyewear

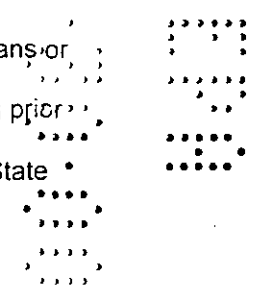
Emergency Information

For spill, leak, fire, exposure, or accident call CHEMTREC at 1-800-424-9300.

Environmental Hazards

This pesticide is toxic to aquatic invertebrates. Keep out of lakes, ponds, and streams. Do not apply directly to water bodies, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. 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. Keep off lawns and plants, as they may be severely injured. Foam should be shoveled off planted areas immediately rather than washing off with water.

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.



User Safety Recommendations

- Users should:
- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
 - Remove clothing 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
 - Do not enter manholes or other confined space areas adjacent to treated areas until all foam or spray has dried and always use full Federal and State OSHA mandated procedures for confined space entry.

PRODUCT INFORMATION

RAZORROOTER II™ is uniquely suited to sewer applications. RAZORROOTER II™ is a soluble liquid designed to control tree roots in sewer, on contact. RAZORROOTER II™ is a non-selective herbicide, which works on all varieties of tree roots and will not harm above-ground vegetation, when applied according to label instructions. RAZORROOTER II™ is not volatile, and will not produce toxic gases.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. Refer to the personal protective equipment information under Precautionary Statements and use all required protective clothing and equipment.

RAZORROOTER II™ may be applied directly to sewers either as a high-pressure spray or as a foam. RAZORROOTER II™ may be applied in conjunction with herbicides, surfactants and foaming agents available through FPI. RAZORROOTER II™ is not compatible with anionic surfactants.

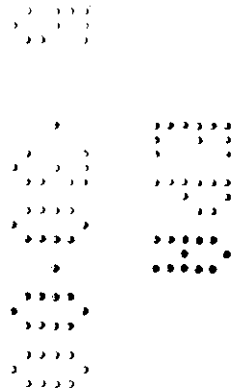
Consider pipe size, sewer flow, lateral conditions, line obstructions, and severity of root intrusion in selecting proper application technique.

Mixing Instructions

Before mixing, determine the scope of work, including pipe size and overall lineal footage, while assessing field conditions. Using the charts below as guidance, determine the amount of solution required for the job.

Small Diameter Pipes

Total Gallons Prepared Solution	Treatment Area (Lineal Feet) Per Pipe Diameter				
	4"	6"	8"	10"	12"
10	300'	140'	80'	50'	35'
100	3000'	1400'	800'	500'	350'
200	6000'	2800'	1600'	1000'	700'
300	9000'	4200'	2400'	1500'	1050'



Large Diameter Pipes

Total Gallons Prepared Solution	Treatment Area (Lineal Feet) Per Pipe Diameter								
	15"	18"	21"	24"	27"	30"	36"	42"	48"
10	35	27	23	20	17	15	12	11	10
100	350	270	230	200	170	150	120	110	100
200	700	540	460	400	340	300	240	220	200
300	1050	810	690	600	510	450	360	330	300

Prepare solution by mixing at a rate of 2 quarts of RAZOROOTER II™ per 100 gallons of water. Use only clean, fresh water to prepare the solution. Prepare enough solution to complete the job, or to fill the solution tank, whichever is less. Use solution promptly after mixing.

If foaming method will be used, add the amount of foaming agent required to produce 20 gallons of foam per gallon of solution, as prepared above. Only use foam-making equipment approved by FPI, and additives approved by FPI which specifically state "for use with RAZOROOTER II™" on the label. RAZOROOTER II™ is not compatible with anionic surfactants.

Spray Application

Prepared RAZOROOTER II™ solution may be sprayed into sewers at various pressures and flow rates, depending upon the capabilities of the application equipment. Do not exceed the equipment manufacturer's recommendations for pressures and flow rates.

Begin at downstream sections of the area to be treated. Insert the spray discharge hose through the length of the pipeline intended for treatment. Spray the prepared RAZOROOTER II™ solution under pressure as the hose is retrieved. Retrieve the discharge hose at a rate sufficient to contact and saturate all root masses in the pipeline with RAZOROOTER II™ solution, applying to the point of runoff. Monitor tank level and solution flow rate to calibrate discharge hose retrieval rate, in order to evenly apply all prepared solution.

Treat large pipes (15" or larger in diameter) with a hose fitted with skids designed to elevate the discharge nozzle. This will center the discharge nozzle in the pipe and enhance performance. Contact FPI to obtain skids, if needed.

Treat manholes by retrieving hose vertically while spraying walls to the point of runoff. Do not re-enter manholes until sprays have dried.

Foam Application

Mixing prepared RAZOROOTER II™ solution with foam during application extends contact time of roots with product, and helps product to reach roots in lateral connections. Foam application equipment used with RAZOROOTER II™ must be approved by FPI and used only by applicators trained to operate the equipment. Training in RAZOROOTER II™ application by foam is available from FPI.

Begin at downstream sections of the area to be treated. Insert the spray discharge hose through the length of the pipeline intended for treatment. Spray the prepared RAZOROOTER II™ solution and foam under pressure as the hose is retrieved.

Treat manholes by applying a 3" layer of foam to walls while retrieving hose vertically. Do not re-enter manholes until foam has dried.

Building Laterals: Building laterals may be treated using the foaming method by injecting the foam via flow-through inflatable cleanout plugs. Cap or plug all drain lines, cleanouts, and fixtures

that tie into the line being treated. Determine the lateral pipe size and length and operate equipment for the time it takes to product the required amount of foam. Use caution to prevent plug blow out.

STORAGE AND DISPOSAL

Prohibitions: Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited.

Storage: Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Do not contaminate feed, foodstuffs or drinking water. Do not store or transport near feed or food. Store at temperature above 32°F. For help with any spill, leak, fire or exposure involving this material, call CHEMTREC (1-800-424-9300).

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Do not reuse empty container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Container Disposal For Bulk and Min-bulk Containers: Reseal container and offer for reconditioning, or triple rinse (or equivalent) and offer for recycling or reconditioning, or clean in accordance with manufacturers instructions.

Container Precautions: Before refilling, inspect thoroughly for damage, such as cracks, punctures, bulges, dents, abrasions and damaged or worn threads on closure devices.

Refill Only With RAZOROOTER II™. The contents of this container cannot be completely removed by cleaning. Refilling with materials other than RAZOROOTER II™ will result in contamination and may weaken container.

After filling and before transporting, check for leaks.
Do not refill or transport damaged or leaking container.

CONTAINER IS NOT SAFE FOR FOOD, FEED OR DRINKING WATER.

WARRANTY STATEMENT

FPI and Seller warrant that this product conforms to its chemical description and is reasonable fit for the purpose stated on the label when used in accordance with the directions and instructions specified on the label under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to FPI or Seller, and buyer assumes the risk of any such use.

RAZOROOTER II™ is a trademark of FPI.