

64898-8

5/9/2013

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Karen Warkentien
Consultant to Sewer Sciences, Inc.
Sewer Sciences, Inc.
1020 Hiawatha Boulevard West
Syracuse, NY 13204

MAY 09 2013

Subject: Notification; Per PR-Notice 2007-4
RAZOROOTER II
EPA Reg. No. 64898-8
Date Submitted: March 27, 2012

Dear Ms. Warkentien:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated March 27, 2013 for the product referenced above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 2007-4 and finds that the action requested falls within the scope of PRN 2007-4. The label submitted with the application has been stamped "Notification" and will be placed in our records.

Note there is a typographical error in the Storage and Disposal Section, the header for "Refillable container." should be "Container Handling" instead of "Container Disposal". Please make this change.

If you have any questions regarding this letter, please contact Amaris Johnson at (703) 305-9542 or johnson.amaris@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague".

Kathryn V. Montague
Product Manager 23
Herbicide Branch
Registration Division (7505P)

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 64898-8	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) RAZORROOTER II (TM)	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Sewer Sciences, Inc. 1020 Hiawatha Boulevard West Syracuse NY 13204 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

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Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Label Change per PR Notice 2007-4: This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 USC § 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 qt; 1, 2.5, 5, 15, 30, 55, >55 gal		5. Location of Label Directions <input checked="" type="checkbox"/> on container	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued Stenciled			<input checked="" type="checkbox"/> Other adhesive paper		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Karen E. Warkentien	Title Consultant to Sewer Sciences, Inc.	Telephone No. (Include Area Code) (202) 393-3903 x22
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Consultant to Sewer Sciences, Inc.	
4. Typed Name Karen E. Warkentien	5. Date 27 March 2013	

LEWIS & HARRISON

122 C Street, N.W., Suite 505
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

Consultants in Government Affairs

27 March 2013

Via Hand Delivery

Ms. Kathryn Montague, PM #23
Registration Division (7505P)
Office of Pesticide Programs (NOTIF)
US Environmental Protection Agency
One Potomac Yard
2777 Crystal Drive
Arlington VA 22202

**SUBJECT: RAZOROOTER II™, EPA Reg. No. 64898-8
Application for Pesticide Notification
Addition of Container Disposal Language per PRN 2007-4**

Dear Ms. Montague:

On behalf of our client, Sewer Sciences, Inc. (SSI), Lewis & Harrison, LLC, submits herewith the following documents in support of the PRN 2007-4 Notification for RAZOROOTER II™, EPA Reg. No. 64898-8:

Volume I: Administrative Materials

- Application for Pesticide Notification (EPA Form 8570-1)
- Draft label (two copies, one with highlighted changes)

This submission is made in response to PR Notice 2007-4.

Notification of Label Change per PR Notice 2007-4

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 USC § 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

RAZORROOTER II™

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

ACTIVE INGREDIENT:	By Weight
Diquat dibromide [6,7-dihydrodipyrido (1,2-a:2',1'-c) pyrazinediium dibromide]	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	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If on skin or clothing:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have a 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.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice.
Hot Line Number	
For 24-hour Emergency medical assistance call Prozar: 1-800-291-7661.	
Note to Physician: Call Prozar 1-800-291-7661 at any hour to obtain toxicology information and a diquat analysis. To be effective, treatment for diquat poisoning must be performed 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.	

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

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

Net Contents: _____

Made in U.S.A.
Sewer Sciences, Inc. (SSI)
1020 Hiawatha Blvd. West
Syracuse, NY 13204

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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, 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:

- 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. 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.

Notify appropriate wastewater agency prior to use of this product so that it may monitor the operations of the wastewater treatment plant.

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

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.

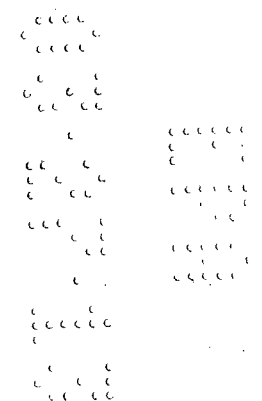
Consider pipe size, sewer flow, lateral conditions, line obstructions, and severity of root intrusion in selecting proper application technique.

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	1000'	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 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 & 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 [less than 5 gallons]: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use and disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Handling

Container Disposal [Bulk/Mini-Bulk]: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the person refilling. To clean container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available or puncture and dispose of container in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

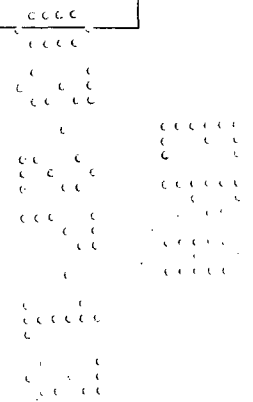
Container Precautions: Before refilling, inspect thoroughly for damage, such as cracks, punctures, bulges, dents, abrasions and damaged or worn threads on closure devices.

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

SSI 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 SSI or Seller, and buyer assumes the risk of any such use.

RAZORROOTER II™ is a trademark of SSI.

