US ENVIRONMENTAL PROTECTION AGENCY OFFICE OF PESTICIDES PROGRAMS REGISTRATION DIVISION (TS-767) WASHINGTON, DC 20460

64945-3

EPA REGISTRATION NO.

DATE OF ISSUANCE 10/28/92

CONDITIONAL

TERM OF ISSUANCE

·____

NOTICE OF PESTICIDE: REREGISTRATION

(Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended)

NAME OF PESTICIDE PRODUCT

ROO-PRU, ROO-PRU MS-32.75 & ROO-PRU DCB-85W

NAME AND ADDRESS OF REGISTRANT (Include ZIP code)

Mr. Eric Jessen, President Conness Company P.O. Box 2546 196 SCR 450, Unit 104 Breckenridge, CO 80424-2546 7

NOTE: Changes in labeling formula differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this production label in the short U.S. EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby Registered/Reregistered under the Federal Insecticide, Fungicide, and Rodenticide Act.

A copy of the labeling accepted in connection with this Registration/Reregistration is returned herewith.

Registration is in no way to be construed as an indorsement or approval of this product by this Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided you:

- 1. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit accepta le responses required for reregistration of your product under FIFRA Section 4.
- 2. Make the labeling changes listed below before you release the product for shipment:
 - a. Add the phrase "EPA Registration No. 64945-3".
 - b. Add Net Contents statements to the ROO-PRU MS-32.7S booklet and container portions of the labeling.
 - c. In Directions For Use of the booklet labeling in part 3 of the Foam Spray section, indicate the unit of measure in the table under "Foam Spray".

BEST AVAILABLE COPY

ATTACHMENT IS APPLICABLE

SIGNATURE OF APPROVING OFFICIAL

Lewis

10/28/92

EPA Form \$570-6 (Rev..5-76)

PREVIOUS EDITION MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

d. In the Statement of Practical Treatment on labeling of the outer package, booklet and the portion remaining on the container of metam-sodium add "Call a physician or poison control center." between "If Swallowed:" and "Drink promptly...".

- 3. Develop a training manual for the use of metam-sodium plus dichlobenil in sewers for control of roots. This training manual should be a collective effort of this particular industry done in cooperation with municipal wastewater treatment authorities. If cooperation cannot be obtained among industry members, the training manual may then be a product of an individual company, preferably done in cooperation with municipal authorities. This manual must address safety as well as use and be submitted to the Agency by June 30, 1993.
- 4. Agree in writing that this product use will become a Restricted Use pesticide for use under direction of a Certified Pesticide Applicator by October 31, 1993.
- 5. Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,

Susan T. Lewis

Product Manager (21)

Fungicide-Herbicide Branch

Registration Division (H7505C)

Enclosure

ROO-PRU® SUPER TRI PAK

. 110

LABE/ #1 DUERPAK CENTER Pane/

ACCEPTED WAS COMMENTS EPA Letter Dated:

Only for use in a combination: c metam-sodium, dichlobenil and feaming agent as directed.

net 28 1992

Under the Federa and todde, Fungicide, and Rod at Life Act as amended, for the pessicide registered under EPA Reg. No.

44945-3

This product contains:

1. ROO-PRU MS-32.7S

ACTIVE INGREDIENT Metam-sodium (sodium methyldithiocarbamate)	% by weight 32.7%
INERT INGREDIENTS	
- Total	
Contains 3.18 lbs. active ingredient per gallon.	
2. ROO-PRU DCB-85W	

Dichlobenit (2, 6-dichlorobenzonitrile)85 % INERT INGREDIENTS5% Total......100 %

3. ROO-PRU WFA (Wetting-Foaming Agent)

KEEP OUT OF REACH OF CHILDREN WARNING

STATEMENT OF PRACTICAL TREATMENT

IF INHALED:

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

attention.

IF ON SKIN:

Wash with plenty of soap and water. Get medical attention,

IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution or, if these are not available, drink large quantities of water. Avoid alcohol. Do not induce vomiting or give anything by mouth in an unconscious

person.

IF IN EYES:

Flush with plenty of water for at least fifteen minutes. Call

a physician if irritation persists.

EPA Reg. No. 64945~

EPA Est. No. 44616 - MO - 1

Net Contents:

1. Metam-Sodium

ROO-PRU MS-32.7S

5 (2x2-1/2) gai.

2. Dichlobenil

ROO-PRU DCB-85W

20 (2x10) oz.

3. Wetting-Foaming Agent ROO-PRU WFA

2 (2x1) pt

Total

5 CMG*

Chemical mix gallon. See directions for use.



196 SCR 450, P.O. Box 2546 Breckenridge, Colorado 80424-2546 (303) 453-1932 1-800-530-8707

LEFT 40+18 PANEL

PRECAUTIONARY STATEMENTS WARNING

HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if absorbed through skin or inhaled. Harmful if swallowed. Causes skin and eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin, or on clothing. Do not breathe vapor or spray mist. A mask or pesticide respirator jointly approved by the National Institute for Occupational Safety and Health and the Mining Enforcement and Safety Administration must be available for use in case of an emergency. Wear protective clothing and chemical resistant gloves. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

PROTECTIVE CLOTHING AND EQUIPMENT REQUIREMENTS

- 1. The following protective clothing and equipment are required to be used by persons actually engaged in carrying out any operations that are likely to involve direct contact with metam-sodium including mixing, loading, equipment calibrations or adjustments, cleaning and repair of application equipment, entering into treated areas, sampling, cleanup of spills, rinsate disposal, or any other activities likely to result in direct contact with the product. This protective equipment must also be used for any operations that are carried out within six feet of unshielded, pressurized hoses containing metam-sodium.
 - A. Splash resistant eye protection.
 - B. Body covering, including shirt and long pants or long sleeved clothing. When a closed system is not used, mixers and loader must also wear chemical-resistant apron or cloth coveralls.
 - C. Chemical-resistant boots and gauntlet-type gloves.
- 2. The following protective equipment must be worn at all times by persons operating or monitoring application equipment.
 - A. Chemical-resistant footwear.
 - B. Body covering including shirt and long pants or long-sleeved cluthing.
- 3. The following protective clothing and equipment must be immediately available at all times for use by persons operating or monitoring application equipment.
 - A. A proper fit tested NiOSH- or MSHA- approved half face respirator with organic vapor cartridge(s) plus splash resistant eye protection or a NiOSH- or MSHA- approved full face respirator with organic vapor cartridge(s). This equipment must be worn when the pungent, rotten egg or sulfur-like odor of metam-sodium is detected.
 - B. Chemical-resistant gauntlet-type gloves. These must be worn when a person is engaged in carrying out any operation that is likely to involve direct contact with the product, including the operations listed in paragraph No. 1 above.

USE PRECAUTIONS: Consideration must be given to all sewer service lines and building elevations and basements for the possibility of foam coming up out of drains. Consideration must be given to distance between houses and sewer to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps, and drains with no traps that would allow foam to easily emerge. Building drains may be plugged to protect against backup and flooding. Follow the directions for measurement and use carefully to avoid using excess foem that may be forced up late al lines into building drains. Lateral lines may be treated, but do not force excessive form into service lines which may cause it to be forced up lateral lines to building drains. Building occupants should exit structures if the pungent, rotten egg or sulfur-like odor of metern-sodium is detected. Open windows and ventilate with fans. Flush drains with ample water if the odor comes from them. Use a squeegee, dust pan, or wet vacuum and gerbage bage for spills or backups and dispose of foam and liquid in an open drain or munhole. After removal of foam and liquid, wash area of spill or backup with water and detergent and flush down drain. If rugs or cloth are contacted, take outside and dry before isundering separately.

(Continued on right penel)



PRECAUTIONARY STATEMENTS

(Continuation from left panel)

ENVIRONMENTAL HAZARDS

Keep out of lakes, ponds or streams. Toxic to fish and aquatic life. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contamineta water when disposing of equipment washwaters. Equipment washwaters and we see resulting from the use of this product may be disposed of an site according to label directions for use or at an approved waste disposal facility. 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. In case of chemical emergencies involving a spill, leaks, fire, exposure, or accident contact CHEMTREC 1-800-424-9300.

USE PRECAUTIONS: High concentrations of these chemicals in waste water may adversely affect the biological sewage breakdown process in wastewater treatment plants. Large scale applications to sewage collection systems in proximity to a sewage treatment plant should be divided into smaller sectional treatments done at one or two day intervals to minimize effects on the sewage treatment process. Inform appropriate wastewater treatment plant officials prior to use so they may check for any unusual pungent, rotten egg or sulfur-like odor of metam-sodium above that of sewage and monitor the performance of filter beds or digesters. If the odor is detected at the sewage treatment plant or the biological breakdown process is activersely affected, root control applications should cease until normal conditions are established. Subsequent treatments should be reduced in size or volume and spread over greater time intervals.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Refer to the protective clothing and equipment information under PRECAUTIONARY STATEMENTS and use all required protective clothing and equipment. The metam-sodium and cichlobenil may be used only in combination and with a foaming agent to control roots in sewer systems according to the directions for use. They may be used only where wastewater treated for root control will be processed through a wastewater treatment facility.

Refer to booklet label on inner package of metam-sodium for detailed directions for use.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or di posal. Refer to booklet label on inner package of metam-sodium for detailed directions for use.

STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock, or other vegetation matter. Do not store near pet or livestock quarters. Store in a well-ventilated area. Keep containers tightly closed when not in use. Do not store below 0°F. The liquid components of this TRI-PAK become cloudy or crystallize at lower temperatures. Warm or store at higher temperatures and mix to dissolve crystals and assure uniformity before use.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of 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:

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

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

Outer box: Dispose of empty box in a sanitary landfill or by incineration or, if allowed by stath and local law, by burning. If burned, stay out of smoke.

LIMITATIC .: OF LIABILITY ... READ CAREFULLY

See enclosed booklet.

BEST AVAILABLE was

with COMMENTS in EPA Letter Dated:

nct 28 1992

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

ROO-PRU® **MS-32.7S**

A Nonsystemic Fumigant Solution for pruning roots in wastewater collecting systems

Only for use as a combination of metam-sodium, dichlobenil and foaming agent as directed.

ACTIVE INGREDIENT	% by weight
Metam-sodium (sodium methyldithiocarbamate)	32.7%
INERT INGREDIÈNTS	
Total	
Contains 3.18 lbs. active ingredient per gallon.	

EPA Reg. No. 64945

EPA Est. No. 44616 - MO - 1

KEEP OUT OF REACH OF CHILDREN WARNING

STATEMENT OF PRACTICAL TREATMENT

IF INHALED:

Remove victim to fresh air. If not breathing, give artificial respiration,

preferably mouth-to-mouth. Get medical attention.

IF ON SKIN:

Wash with plenty of soap and water. Get medical attention.

IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution or, if these are not available, drink large quantities of water. Avoid alcohol. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES:

Flush with plenty of water for at least fifteen minutes. Call a physician if

irritation persists.

FOR ADDITIONAL PRECAUTIONARY STATEMENTS: See Inside Booklet

In case of significant spills call CHEMTREC 1-800-424-9300



196 SCR 450, P.O. Box 2546 Breckenridge, Colorado 80424-2546 (303) 453-1932 1-800-530-8707

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ROO-PRU is a registered trademark of Conness Co.

PRECAUTIONARY STATEMENTS WARNING

HAZARDOUS TO HUMAN 3 AND DOMESTIC ANIMA

PROTECTIVE CLOTHING AL J EQUIPMENT REQUIREMENTS

- 1. The following protective clothing and equipment are required to be used by persons actually engaged in carrying out any operations that are likely to involve direct contact with metam-sodium including mixing, loading, equipment calibrations or adjustments, cleaning and repair of application equipment, entering into treated areas, sampling, cleanup of spills, rinsate disposal or any other activities likely to result in direct contact with the product. This protective equipment must also be used for any operations that are carried out within six feet of unshielded, pressurized hoses containing metam-sodium.
 - A. Splash resistant eye protection.
 - B. Body covering inclinding shirt and long pants or long-sleeved clothing. When a closed system is not used, mixers and loader must also wear chemical-resistant apron or cloth coveralis.
 - C. Chemical-resistant boots and gauntlet-type gloves.
- The following protective equipment must be worn at all times by persons operating or monitoring application equipment.
 - A. Chemic: I-resistant footwear.
 - B. Body covering including shirt and long pants or long sleeved clothing.
- 3. The following protective clothing and equipment must be immediately available at all times for use by persons operating or monitoring application equipment.
 - A. A proper fit tested NIOSH- or MSHA- approved half face respirator with organic vapor cartric' .e(s) plus splash resistant eye protection or a NIOSH- or MSHA- approved full face respirator with organic vapor cartridge(s). This equipment must be worn in case of emergincies or leaks when the pungent, rotten egg, or sulfur-like odor of metam-sodium is detected.
 - B. Chemical-resistant gauntlet-type gloves. These must be worn when a person is engaged in carrying out any operation that is likely to involve direct contact with the product, including the operations listed in paragraph No. 1 above.

USE PRECAUTIONS: Consideration must be given to all sewer service lines and building elevations and basements for the possibility of foam coming up out of drains. Consideration must be given to distance between houses and sewer to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps and drains with no traps that would allow foam to easily emerge. Building drains may be plugged to protect against backup and flooding. Follow the directions for measurement and use carefully to avoid using excess foam that may be forced up lateral lines to building drains. Lateral lines may be treated, but do not force excessive foam into service lines which may cause it to be forced up lateral lines into building drains. Building occupants should exit structures if thepungent, rotten egg or sulfur-like odor of metam-sodium is detected. Open windows and ventilate with fans. Flush drains with ample water if the odor comes from them. Use a squeegee, dust pan, or wet vacuum and garbage bags for spills or backups and dispose of foam and liquid in an open drain or manhole. After removal of foam and liquid, wash area of spill or backup with water and detergent and flush down drain. If rugs or cloth are contacted, take outside and dry before laundering separately.

ENVIRONMENTAL HAZARDS

Keep out of takes, ponds or streams. Toxic to fish and aquatic life. Do not apply directly to water, 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. Equipment washwaters and wastes resulting from the use of this product may be disposed of on site according to label directions for use or at an approved waste disposal facility. Do not use in potable water systems. Do not use in storm, field or other drains unless effluent is treated in a sanitary sower system. Keep off lawns and plants as they may 1.9 severely injured. Foam should be shoveled off planted areas immediately rather than washing off will water.

In case of significant spills contact CHEMTREC 1-800-424-9300.

USE PRECAUTIONS: High concentrations of these chemicals in wastewater may a fversely affect the biological sewage breakdown process in wastewater treatment plants. Large scale applications to sewage collection systems in proximity to a sewage treatment plant should be divided into smaller sectional treatments done at one or two day intervals to minimize effects on the sewage treatment process. Inform appropriate wastewater treatment plant officials prior to use so they may check for any unusual rotten egg or sulfur-like odor of metam-sodium above that of sewage and monitor the performance on filter beds or digestors. If the odor is detected at the sewage treatment plant or the biological breakdown process is adversely affected, root control applications should cease until normal conditions are established. Subsequent treatments should be reduced in size or volume and spread over greater time intervals.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Refer to the protective clothing and equipment information under PRECAUTIONARY STATEMENTS and use all required protective clothing and equipment. The metam-sodium may be used only in combination with ROO-PRU DCB 85W and ROO-PRU WFA wetting/foaming agent to control roots in sewer systems according to the directions for une. They may be used only where wastewater treated for root control will be processed through a wastewater treatment facility.

GENERAL

- Determine which collection system lines have known root problems and require treatment with root control chemicals.
- 2. Best results are obtained if the pipe to be treated is cleaned with a high pressure jet cleaner prior to the chemical treatment. When roots are mechanically cut or severely damaged by the cleaning process allow 60 to 90 days for root regrowth to start prior to chemical treatment.
- Following treatment allow 60 to 90 days for the roots to die and decompose prior to assessing the effectiveness of the treatment.
- Establish your treatment sequence. In order not to affect previously treated sections, start with the uppermost manhole section of the line to be treated.
- 5. Check all safety equipment for serviceability. USE THE EQUIPMEN1 and follow the procedures as prescribed under the, "Protective Clothing and Equipment Requirements" on this label and as prescribed by OSHA for confined space entry.
- 6. Equipment Calibration: It is recommended that equipment calibration be checked daily or any time conditions of operation change. Due to variation in equipment and conditions, consult and follow the equipment manufacturer's recommendations on calibration procedures. Contact your chemical supplier for the no specifical formulation to use for calibration purposes.
- 7. Calculate quantity of ROO-PRU/water mix to prepare.

NOTE: FUTURE REFERENCE IN THIS BOOKLET WILL BE MADE TO CHEMICAL AliX (mixture of the three components of the Tri Pak and water) AND CHEMICAL MIX GALLON [CMG]-(mixture of the three chemical components, i.e. 1 gallon MS32.7S + 4 ounces DCB 85W+ 0.4 pints WFA = slightly more than 1 gallon).

The following table provides the recipe for the ROO-PRU chemical mix for Foam Fill application:

1 gal. MS-32.7S + 4 oz. DCB-85W + 0.4 pt. WFA = 1 CMG 2 gal. MS-32.7S + 8 oz. DCB-85W + 0.8 pt. WFA = 2 CMG 2-1/2 gal. MS-32.7S + 10oz. DCB-85W + 1.0 pt. WFA = 2.5 CMG 1 Tri-Pak = 2.5 CMG

1 Super Tri-Pak = 5 CMG

Tests show that the chemical mix is stable for at least 7 days prior to use.

Chemical Preparation: Prior to diluting chemical with water, mix the three ingredients together by adding the contents of one (1) 10 oz. bottle of ROO-PRU DCB-85W and one (1) pint bottle of ROO-PRU WFA to one (1) 2-1/2 gallon container of ROO-PRU MS 32.7S. Replace 2-1/2 gallon cap and invert repeatedly until thoroughly mixed then pour contents into chemical/water mix tank or blend chemical mix and water just prior to the foam equipment. DO NOT store the nixed chemical for more than 7 days. Remix chemical prior to use. DO NOT prepare more chemical/water mix than can be used in one day.

. Determine total footage of pipe by pipe diameter and method of treatment, i.e. foam fill or foam spray to be treated in a given day. Use promptly after mixing. DO NOT allow chemical/water mix to stand overnight. DO NOT allow solution to stand (mild agitation is necessary to keep the DCB-65W in suspension). Flush all equipment with water after each days use. Disassemble valves and clean thoroughly.

B. The two methods of calculating the ROO-PRU mix ratio and amount of chemical mix/water solution to prepare are dependent on pipe diameter and method of application. Pipe diameter 10° or less require filling the entire pipe void with foam (Foam Fill). Pipe diameters of 12° or larger are more economically treated by using a nozzel designed to place foam directly on the root masses and pipe surface (Foam Spray). In addition to pipe size other factors may dictate the method of application, i.e. wastowater level and velocity of flow, root density, etc.

FOAM FILL: Four (4) Inch (+) Pipe (Entire Pipe Void)

Foam Characteristics Desired: Dry, dense, and cohesiveness similar to shaving cream. Application Procedures Foam Fill Requirements, Mixing and Calculations.

Sewer Pipe Capacitics are:

Diameter/Inch	Gal/Foot	Dian:et/r/Inch	Gal/Foot
4	0.7	16	10.5
6	1.5	18	13.5
8	2.5	20	16.3
10	4.0	21	18.0
12	6.0	24	23.5

- 1. Check server pig a capacity table above to determine total foam required. Pipe capacity (fnam/foot) X (length of section, + (10-25%) = foam volume required.
- 2. After determining fear volume in gallons required to fill the section(s) of sewer line to be treated with fear, use the following table to determine the ROO-PRU/water solution required.

Foam Produced Per Gallon of Solution:

To Water	Add ROO-PRU	Annual of Form Produced
25.0 gal.	1.0 CMG	540 gal.
50.0 gal.	2.0 CMG	1,080 gal.
62.5 gal.	2.5 CMG	1,350 gal (1-1RI-PAIQ)
125.0 gal.	5.0 CMG	2,700 gal. TI-SUPER TRIPAN
200.0 gal,	7.5 CMG	4050 gal. (1-1/2 SUPER TRI-PAKS)

- 3. Main Line: Insert chemical discharge hose through the entire section of pipe to be treated. Start from generating equipment and withdraw discharge hose at a rate calibrated to fill the line to capacity until foam appears at input manhole. Refer to equipment manual for the specific calibrated rate of hose retraction.
- 4. Building Service Lines: USE EXTREME CAUTION. Always plug building side of deanout to prevent backup into building. Always treat from cleanout closest to building down to sewer main. Attach the chemical discharge hose to a pneumatic type by-pass pumping plug. Insert and position the plug in the service line cleanout and inflate in the cleanout to prevent foam from overflowing and/or the plug blowing out. CAUTION: CHEMICAL OVERFLOWING OR SPILLED ON GROUND ADJACENT TO THE CLEANOUT MAY CAUSE DAMAGE TO DESIRABLE PLANTS AND LANDSCAPING.

Once the plug has been securely inflated, pump foam into the line until required amount has been discharged into the service line. Refer to equipment manual for specific calibration rate.

FOAM SPRAY: Twelve (12) Inch and Larger Pipe (Directed to Roots and Pipe Surface).

Foam Characteristics Desired: Wet, dense, noncohesive. Splatters when applied to manhole wells.

1. Reduce the amount of ROO-PRU WFA (Wetting-Foaming Adjuvant) to one half (1/2) when preparing chemical mix, i.e.:

1.0 CMG = 0.2 pt. WFA

2.0 CMG = 0.4 pt. WFA 2.5 CMG = 0.5 pt. WFA

The excess WFA may be kept and used as a non-toxic calibration agent.

2. See the table below to determine the reference quantity of foam spray needed per foot of pipe, then multiply by the length of pipe to be treated to determine the total amount of finished foam needed.

Diameter	roam Gal/Ft	Pipe Diameter	Foam Gal
12°	4	`32 - 36*	12
14"	8	40 - 42°	14
16"	10	44 - 48"	16

These reference quantities of foam may be adjusted to account for varying root and flow conditions within the pipe. Foam Gal./Foot X Total = Finished Foam Needed

3. In order to determine the amount of chemic: mix solution to prepare from the total amount of foam spray required, divide foam spray required by 2. (20 gallons of foam spray are produced from 1 gallon of chemical mix solution) refer to the following table for solution mixing instructions to obtain the proper chemical mix to water (volume/volume).

To Water Coat	Add ROO-PRU	Total Solution	Foam Spray , 7
14 gal.	1 CMG	15 gal.	000
28 gal.	2 CMG	30 ഉച്ച.	600
35 gal.	2.5 CMG	37.5 gal.	750 C
70 gal.	5 CMG	75 gal.	1,500

4. Foam Spray Application: Insert the chemical discharge hose through the entire section of pipe to be treated, install foam spray nozzle and position about 2 inches above the flow line of the pipe. Start foam generating equipment and withdraw the chemical hose at rate calibrated to foam spray the specified diameter. Refer to equipment manual for specific calibration rate.

STORAGE AND DISPUSAL

Do not contaminate water, food or foed by storage o: ...sposal.

STORAGE: Do not store near food or feed, seeds, buibs, tubers, nursery stock, or other vegetation matter. Do not store near pet or livestock quarters. Store in a well ventilated area. Keep containers tightly closed when not in use. Do Not store below 0° F. The liquid components of this TRI-PAK become cloudy or crystallize at lower temperatures. Warm or store at higher temperatures and mix to dissolve crystals and assure uniformity before use.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of 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.

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

LIMITATION OF LIABILITY... READ CAREFULLY

Soller disclaims all liability, tort or otherwise, and all warranties, expressed or implied, including merchantability, seller shall not be liable for any damages, whether they be direct, consequential, special or indirect, which result from the use or handling of this product. Soller's sole liability and buyer's and user's sole remedy shall be limited to the refund of the purchase price.

ROO-PRU® MS-32.75

LABEL ZA PARIS

10/beries

Contains 3.18 lbs. active ingredient per gallon.

REMAINS ON CONTAINER

EPA Reg. No. 64945

EPA Est. No. 44616 - MO - 1

KEEP OUT OF REACH OF CHILDREN WARNING

Left Panel CENTER PANEL Richt PANE

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with COMMENIS
in EPA Letter Dated:

OCT 28 1992

Under the the Life Fungicides and the Less for the registered under EPA Day No.

64945-3

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PRECAUTIONARY STATEMENTS WARNING

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

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

IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution or, if these are not available, drink large quantities of water. Avoid alcohol. Do not induce vomiting or give anything by mouth to an unconscious person. IF IN EYES: Flush with plenty of water for at least 15 minutes. Call a physician if irritation persists. HAZARDS TO HUMANS AND DOMESTIC ANIMALS

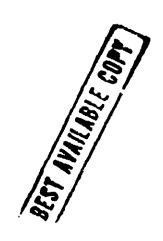
May be fatal if absorbed through skin or inhaled. Harmful if swallowed. Causes skin and eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. A mask or pesticide respirator jointly approved by the National Institute for Occupational Safety and Health and the Mining Enforcement and Safety Administration must be available for use in case of an emergency. Wear protective clothing and chemical resistant gloves. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

PROTECTIVE CLOTHING AND EQUIPMENT REQUIREMENTS

- 1. The following protective clothing and equipment are required to be used by persons actually engaged in carrying out any operations that are likely to involve direct contact with metam-so-dium including mixing, loading, equipment calibrations or adjustments, cleaning and repair of application equipment, entering into treated areas, sampling, clean up of spills, rinsate disposal or any other activities likely to result in direct contact with the product. This protective equipment must also be used for any operations that are carried out within six feat of unshielded, pressurized hoses containing metam-sodium.
- A. Splash resistant eye protection.
- B. Body covering including shirt and long pants or long sleeved clothing. When a closed system is not used, mixers and loader must also wear a chemical resistant apron or cloth coveralls.
- C. Chemical resistant boots and gauntlet-type gloves.
- 2. The following protective equipment must be worn at all times by persons operating or monitoring application equipment.
- A. Chemical resistant footwear.
- B. Body covering including shirt and long pants or long sleeved clothing.
- The following protective clothing and equipment must be immediately available at all times for use by persons operating or monitoring application equipment.

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LEFT PANE!



A. A properly fit tested NIOSH- or MSHA-approved half face respirator with organic vapor cartridge(s) plus splash resistant eye protection or a NiOSH- or MSHA- approved full face respirator with organic vapor cartridge(s). This equipment must be worn in case of emergency or leaks when the pungent, rotten egg or sulfur-like odor of metam-sodium is detected.

B. Chemical resistant gauntlet-type gloves. These must be worn when a person it engaged in carrying out any operation that is likely to involve direct contact with the product. Including the operations listed in paragraph No. 1 above.

USE PRECAUTIONS: Consideration - Austitie given to all sewer service lines and building elevations and basements for the possibility of foam coming up out of drains. Consideration must be given to distance between houses and sewer to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps and drains with no traps that would allow foam to easily emerge. Building drains may be plugged to protect against backup and flooding. Follow the directions for measurement and use carefully to avoid using excess foam that may be forced up lateral lines to building drains. Lateral lines may be treated, but do not force excessive foam into service lines which may cause it to be forced up lateral lines into building drains. Building occupants should exit structures if the rotten egg or sulfur-like odor of meta.;, sodium is detected. Open windows and ventilate with fans. Flush drains with ample water if the odor comes from them. Use a squeegee, dust pen or wet vacuum and garbage bags for spills or backups and dispose of foam and tiquid in an open drain or manhole. After removal of foam and liquid, wash area of splll or backup with water and detergent and flush down drain. If rugs or cloth are contacted, take outside and dry before laundering separately.

ENVIRONMENTAL HAZARDS

Keep out of lakes, ponds, or streams. Toxic to fish and aquatic life. Do not apply directly to water, to areas where surface water is present or to intertidal areas below it near high water mark. Do not contaminate water when disposing of equipment washwaters. Equipment washwaters and wastes resulting from the use of this product may be disposed of on site according to label directions of use or at an approved waste disposal facility. Do not use in potable water systems. Do not use in storm, field or other drains unless effluent is treated in a sonitary 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

USE PRECAUTIONS: High concentrations of these chemicals in waste water may adversely affect the biological sewage breakdown process in wastewater treatment plants. Large scale applications to sewage collection systems in proximity to a sawage treatment plant should be divided into smaller sectional treatments done at only or two day intervals to minimize effects on the sewage treatment process. Inform appropriate wastewards treatment plant officials prior to use so they may check for any unusual pungent, rotten egg or sulfur-like odor of metam-



Right PANEL

that of sewage and monitor the performance of litter beds or digestors. If the odor is detected at the sewage treatment plant or the biological breakdown process is adversely affected, root control applications should cease until normal conditions are established. Subsequent treatments should be reduced in size or volume and spread over greater time intervals. In case of significant spills contact CHEMTREC 1-800-424-9300.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Refer to the protective clothing and equipment information under PRECAUTIONARY STATEMENTS and use all required protective clothing and equipment. The motam-sodium and dichlobenil may be used only in combination and with a foaming agent to control roots in sewer systems according to the directions for use. They may be used only where wastewater from root control is processed through a wastewater treatment facility. Refer to the enclosed booklet for detailed directions for use.

STORAGE AND DISPOSAL

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

STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetation matter. Do not store near pet or livestock quarters. Store in a well ventilated area. Keep containers tightly closed when not in use. Do Not store below 0° F. The liquid components of this TRI-PAK become cloudy or crystallize at lower temperatures. Warm or store at higher temperatures and mix to dissolve crystals and assure uniformity before use. DISPOSAL:

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of 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.

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

Limitations of Liability . . . Read Carefully Seller disclaims all liability, tort or otherwise, and all warranties, expressed or: implied, including any warranty of fitness for a particular purpose or merchantibility. Seller shall not be liable for any damages, whether they be direct, consequential or indirect, which result from the use or handling of this product. Seller's sole liability and buyer's and user's sole remedy shall be limited to the refund of the purchase price.





10/6/92

CENTER PANEL

ACCEPTED
with COMMENTS
in EPA Late Outcoil

OCT 28 1992

ROO-PRU° DCB-85W

Only for use as a combination of matern-sodium, dichlobenii and foarning agent as directed.

ACTIVE INGREDIENT % by weight Dichlobenii (2, 6-dichlorobenzdonitrile) 85% INERT INGREDIENTS 15% Total 100%

KEEP OUT OF REACH OF CHILDREN WARNING

STALEMENT OF PRACTICAL TREATMENT

IF INHALED: Remove victim to fresh air. If not breathing, give artificial

respiration, preferably mouth-to-mouth. Get medical

attention.

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

IF SWALLOWED: Call a physician or polson control center. Drink one or two

glasses of water and induce vomiting by touching the back of the throat with finger. Do not induce vomiting or give anything

by mouth to an unconscious person.

IF IN EYES: Flush with plenty of water for at least fifteen minutes. Call a

physician II irritation persists.

EPA Reg. No. 64945 Net Contents: 100z. EPA Est. No. 44616 - MO - 1 ROO-PRU is a registered trademark of Connecs Co.

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196 SCR 459, P.O. Box 2546 Brechenridge, Colorado 80424-2546 (303) 453-1932 1-000-530-8707

9/92 L-3



PRECAUTIONARY STATEMENTS WARNING

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal: "ribsorbed through skin or inhaled, Harmful if swallowed. Do not get in eyes, on skin or on clothing. Do not broathe vapor or spray mist. A mask or pesticide respirator jointly approved by the National Institute for Occupational Safety and Health and the Mining Enforcement and Safety Administration must be available for use in case of an emergenc, . Wear protective clothing and chemical resistant gloves. Wash thoroughly with scep and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

PROTECTIVE CLOTHING AND EQUIPMENT REQUIREMENTS

1. The following protective clothing and equipment are required to be used by persons actually engaged in carrying out any operations that are likely to involve direct contact with matern-sodium including mixing, loading, equipment calibrations or adjustments, clean up and repair of application equipment, entering into treated areas, sampling, clean up of spills, riminus disposal or any other activities likely to result in direct contact with the product. This protective equipment must also be used for any operations that are carried out within six feet of unshielded, pressurized hoses containing metam-sodium.

A. Splash resistant eye protection.

B. Body covering including shirt and long pants or long sleeved clothing. When a closed system is not used, mixers and loader must also wear a chemical resistant apron or cloth coveralls.

C.Chemical resistant boots and gauntiet-type gloves.

2. The following protective equipment must be worn at all times by persons operating or monitoring application equipment.

A. Chemical resistant footwear,

B. Body covering including shirt and long pants or long sleeved clothing.

3. The following protective clothing and equipment must be immediately available.

at all times for use by persons operating or monitoring application equipment.

A. A properly fit tested NIOSH- or MSHA- approved half face respirator with organic vapor cartridge(s) plus spiash resistant eye protection or a NIOSH- or MSHA-approved full face respirator with impanic vapor cartridge(s). This equipment must be worn in case of emergency or leaks when the pungent, rotten egg or sulfur-like odor of metam-sodium is detected.

B. Chemical resistant gauntiet-type gloves. These must be worn when a person is engaged in carrying out any operation that is likely to involve direct contact with the product, including the operations listed in paragraph No. 1 above.

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ENVIRONMENTAL HAZARDS

Keep out of Int. as, ponds or streams. Do not apply directly to water, to areas where surface witer is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Equipment washwaters and wastes resulting from the use of this product may be disposed of on site according to label directions for use or at an approved waste disposal facility. Do not use in potable water systems or storm, field or other drains from which untreated water is discharged.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Refer to the protective clothing and equipment information under PRECAUTIONARY STATEMENTS and use all required clothing and equipment. This dichlobent may be used only in combination with the metam-sodium and with a foaming agent to control roots in sewer systems according to the directions for use. They may be used only where wastewater from root control is processed through a verstewater treatment facility. Refer to specific mixing and use directions and a sociated calculations on the inner package labeling of the metam-sodium product. Do not use this product without these specific directions and full precautionary labeling.

STOFAGE AND DISPOSAL

Do not contaminate water, foc i or feed by storage or disposal.

STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock, or other vegetative matter. Keep containers tightly closed when not in use. Store in a dry place.

PESTICIDE DISPOSAL: Pesticide wastes are toxic, improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of 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.

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

Limitation of Liability . . . Road Carabilly

Seller declaims all Excility, tort or otherwise, and all warranties, expressed or implied, including any warranty of litness for a perfectior purpose or merchantitility, safer shall not be Eable for any damages, whether they be direct, consequential, special or indirect, which result from the usu or hinding of this product. Safer's sole Eablify and buyer's and user's sole remedy shall be Emited to a virtual of the purchase price.