



64945-3

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

MAR - 1 1996

OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

Mr. Eric Jessen
Conness Co.
P.O. Box 1486
Paonia, CO 81428

Dear Mr. Jesser:

Subject: Roo Pru Super Tri-Pak
EPA Reg. No. 64945-3
Addition of Restricted Use Labeling
Your submission dated 12-15-95

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)7(A), is acceptable provided that you:

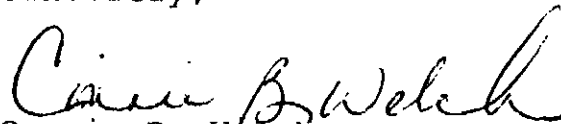
1. Revise the label to include the reason why this product is classified as restricted use. Under the heading "Restricted Use Pesticide", add the phrase "Due to Acute Toxicity".
2. On page 5 of the booklet, in paragraph #1 under the heading "Foam Spray", delete the word "non-toxic".
3. Submit labels for the individual products. The following revisions must be made to labels which will be affixed to the individual containers:
 - a) Metam Sodium label - Add restricted use labeling. Change the signal word to "Danger". Revise the precautionary review statements and Statement of Practical Treatment to correspond to those statements on the outer label and in the booklet.
 - b) Dichlobenil label - Add restricted use labeling.
4. Submit five (5) copies of your final printed labeling before you release the product for shipment.

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If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 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,



Connie B. Welch
Product Manager 21
Fungicide Herbicide Branch
Registration Division (7505C)

3710

RESTRICTED USE PESTICIDE

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAR 01 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
64945-3

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 INGREDIENTS	67.3%
Total	100%

Contains 3.18 lbs. active ingredient per gallon.

EPA Reg. No. 64945-3

EPA Est. No. 44616-MO-1

KEEP OUT OF REACH OF CHILDREN DANGER - PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label find someone to explain it to you in detail).

STATEMENT OF PRACTICAL TREATMENT

- FIRST AID:** Immediately start the procedures given below and contact a Poison Control Center, a physician, or the nearest hospital. Report the type and extent of exposure, describe the victim's symptoms, and follow the advice given.
- IF ON SKIN:** Immediately flush skin with large amounts of running water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention immediately.
- IF IN EYES:** Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart to ensure rinsing of the entire surface of the eye and lids with water. Get medical attention immediately.
- IF INHALED:** Remove to fresh air. If not breathing, clear the victim's airway and start mouth-to-mouth artificial respiration. If breathing is difficult, give oxygen, preferably with a physician's advice. Get medical attention immediately.
- IF SWALLOWED:** Immediately give several glasses of water but do not induce vomiting. If vomiting does occur, give fluids again. Have a physician determine if condition of patient will permit induction of vomiting or evacuation of stomach. Do not give anything by mouth to an unconscious or convulsing person.

FOR ADDITIONAL PRECAUTIONARY STATEMENTS: See Inside Booklet

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



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395 Clark, P.O. Box 1486
Paonia, CO 81428
(970) 527-5377

NET CONTENTS: 2.5 gallon
ROO-PRU is a registered trademark of Conness Co.

Label Booklet

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

CORROSIVE: CAUSES SKIN DAMAGE. MAY BE FATAL IF ABSORBED THROUGH THE SKIN. Do not get on skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Harmful if swallowed. Harmful if inhaled. Irritating to eyes, nose, and throat. Avoid breathing vapor or spray mist. Irritating to eyes. Do not get in eyes.

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 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 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 emergencies 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 the pungent, 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 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 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 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 significant spills contact CHEMTREC 1-800-424-9300.

USE PRECAUTIONS: High concentrations of these chemicals in wastewater 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 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 use. They may be used only where wastewater treated for root control will be processed through a wastewater treatment facility.

GENERAL

1. 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.
3. Following treatment allow 60 to 90 days for the roots to die and decompose prior to assessing the effectiveness of the treatment.
4. 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 EQUIPMENT 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 nonpesticidal 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 MIX (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 MS 32.7S + 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 gallon	MS 32.7S + 4oz. DCB-85W + 0.4 pt. WFA	=	1 CMG
2 gallon	MS 32.7S + 8oz. DCB-85W + 0.8 pt. WFA	=	2 CMG
2 1/2 gallon	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 2½ 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 mixed 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.

A. 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-85W 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 nozzle 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., wastewater 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 for Foam Fill Requirements, Mixing and Calculations.

Sewer Pipe Capacities are:

Diameter/Inch	Gal./Foot	Diameter/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 sewer pipe capacity table above to determine total foam required. Pipe capacity (foam/foot) x (length of section) + (10 - 25%) = foam volume required.
2. After determining foam volume in gallons required to fill the section(s) of sewer line to be treated with foam, use the following table to determine the ROO-PRU/water solution required.

Foam Produced Per Gallon of Solution:		
To Water	Add ROO-PRU	Amount of Foam 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 TRI-PAK)
125.0 gal.	5.0 CMG	2,700 gal. (1 SUPER TRI-PAK)
200.0 GAL.	7.5 cmg	4,050 gal. (1½ SUPER TRI-PAK)

3. Main Line: Insert chemical discharge hose through the entire section of pipe to be treated. Start foam 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 cleanout 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 walls.

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.

Pipe Diameter	Foam Gal./Ft.	Pipe Diameter	Foam Gal./Ft.
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 chemical mix solution to prepare from the total amount of foam spray required, divide foam spray required by 20 (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
14 gal.	1 CMG	15 gal.	300 gal.
28 gal.	2 CMG	30 gal.	600 gal.
35 gal.	2.5 CMG	37.5 gal.	750 gal.
70 gal.	5 CMG	75 gal.	1500 gal.

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 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.

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

Seller 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. Seller's sole liability and buyer's and user's sole remedy shall be limited to the refund of the purchase price.

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

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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.
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(Continued on right panel)



395 Clark Street, P.O. Box 1486
Paonia, CO 81428
(970) 527-5377

1195-L1

RESTRICTED USE PESTICIDE

For retail sale to and use only by Certified Applicators or persons under direct supervision and only for those uses covered by the certified applicator certification.

ROO-PRU® SUPER TRI PAK

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

This product contains:

1. ROO-PRU MS-32.7S	
ACTIVE INGREDIENT	% by weight
Metam-sodium (sodium methyldithiocarbamate)	32.7%
INERT INGREDIENTS	67.3%
Total	100%

Contains 3.18 lbs. active ingredient per gallon.

2. ROO-PRU DCB-85W	
ACTIVE INGREDIENT	
Dichlobenil (2,6-dichlorobenzonitrile)	85%
INERT INGREDIENTS	15%
Total	100%

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

**KEEP OUT OF REACH OF CHILDREN
DANGER - PELIGRO**

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If you do not understand the label find someone to explain it to you in detail.

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IF IN EYES: Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart to ensure rinsing of the entire surface of the eye and lids with water. Get medical attention immediately.

IF INHALED: Remove to fresh air. If not breathing, clear the victim's airway and start mouth-to-mouth artificial respiration. If breathing is difficult, give oxygen preferably with a physician's aid. Get medical attention immediately.

IF SWALLOWED: Immediately give several glasses of water but do not induce vomiting. If vomiting occurs, give fluids again. Have a physician determine if condition of patient will permit inducing vomiting or evacuation of stomach. Do not give anything by mouth to an unconscious person.

EPA Reg. No. 64945-3 EPA Est. No. 44

NET CONTENTS:	
1. Metam-Sodium	ROO-PRU MS-32.7S 5 (2x2 1/2) gal.
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.

ROO-PRU is a registered trademark of Conness Co.

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