

64945-3

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

NOV 20 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Eric Jessen
Conness Company
395 Clark Avenue, P.O. Box 1486
Paonia, CO 84128-1486

Dear Mr. Jessen:

Subject: ROO-PRU DCB-85W
EPA Registration Number 64945-3
RED for Dichlobenil

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable, provided you make the following changes before you release the product for shipment.

Please note that the following changes only apply to the DCB-85W part of the tripack.

1. The Signal word should be changed to CAUTION.
2. Remove the Restricted Use language, as Dichlobenil does not trigger this restriction.
3. Update format of FIRST AID statements to that of PR Notice 2001-1 (see format below):
IF SWALLOWED:
 - Call a poison control center or doctor immediately for treatment advice.
 - Have person sip a glass of water if able to swallow
 - Do not induce vomiting unless told to do so by a poison control center or doctor.
 - Do not give anything by mouth to an unconscious person.IF ON SKIN OR CLOTHING:
 - 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 adviceIF 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 treatment advice.

4. Add the following hotline information under FIRST AID-
“For additional information in case of emergency call toll free (1-800-XXX-XXXX). Have the product container or label with you when calling a poison control center or doctor or going for treatment.”

5. Reformat the Personal Protective Equipment section to the following:
“Personal Protective Equipment (PPE)
Mixers, loaders, applicators and all other handlers must wear:
-Long sleeved shirt and long pants
-Socks and shoes
-Chemical resistant gloves made of any waterproof material
-In addition to the requirements above, mixers and loaders must also wear a chemical resistant apron.”

6. Under a section called User Safety Requirements, add the following text:
“Follow manufacturer’s instructions for cleaning/maintaining PPE. If there are not such instructions for washable PPE, use detergent and hot water. Keep and wash PPE separately from other laundry.”

7. Under a section called User Safety Recommendations, add the following text:
“Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should 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. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.”

8. Change “Storage” to “Pesticide Storage” under STORAGE AND DISPOSAL.

9. Change “Plastic Jar Disposal” to “Container Disposal”

10. Remove PRECAUTIONARY STATEMENTS current language and replace with “Harmful if swallowed or absorbed through skin or inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist.”

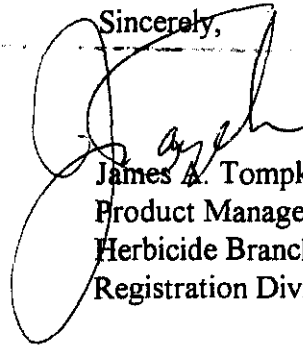
11. Add the following Ground Water Advisory to Environmental Hazards:
“This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in ground-water contamination.”

12. Add the following restriction to the label:
“When used in inhabited buildings (residences, offices, hospitals, etc.) windows must be open or an exhaust fan must be operating during the application.”

13. Note that approval of the label should not be construed as a decision by the Agency that the warranty language is not misleading. This label language may eventually have to be changed because of over broad statements, or language that negates or detracts from required label statements.

Submit three (3) copies of final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,



James A. Tompkins, haj
Product Manager 25
Herbicide Branch
Registration Division (7505C)

Dick Moberg

PRECAUTIONARY STATEMENTS

WARNING

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if absorbed through skin or inhaled. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. A mask of 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 REQUIREMENT

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 gaiter-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 gaiter-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.

RESTRICTED USE PESTICIDE

Due to Acute Toxicity. 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.

ROO-PRU® DCB-85W

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

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

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: Call a physician or poison 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 if irritation persists.

EPA Reg. No. 64945-3

EPA Est. No. 64945-CO-001

Net Contents: 10 oz.

ROO-PRU is a registered trademark of Conness Co.



395 Clark Street, P.O. Box 1486
Paonia, CO 81428
(970)-527-5366

07/98 L-3

ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV 20 2003

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

64945-3

ENVIRONMENTAL HAZARDS

Keep out of lakes, ponds or streams. 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 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 protective clothing and equipment. The dichlobenil 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 wastewater treatment facility. Refer to specific mixing and use directions and associated calculations on the inner package labeling of the metam-sodium product. Do not use this product without these specific directions and full precautionary labeling.

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. Keep containers tightly closed when not in use. Store in 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 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 any warranty of fitness for a particular purpose or 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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