



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 2, 2022

Maryanne Kellogg
Regulatory Consultant
Duke Root Control Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street Court NW
Gig Harbor, WA 98332

Subject: Registration Review Label Mitigation for Dichlobenil
Product Name: Sanafoam Roo-Pru
EPA Registration Number: 94625-2
Application Date: 5/14/2019
Decision Number: 582145

Dear Ms. Kellogg:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Dichlobenil Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently

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Decision No. 582145

approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Darius Stanton by phone at 202-566-2332, or via email at stanton.darius@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

[Optional text appears in brackets – the final label may include some or all of the optional text]
 [Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

{BOOKLET FRONT PANEL LANGUAGE}

DICHLOBENIL	GROUP	20	HERBICIDE
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SANAFOAM ROO-PRU

[Alternate Brand Name: Roo-Pru]

**A Foaming Fumigant
 Rids Sewer [and Storm] Lines of Roots
 Will Not Harm Trees, Non-Systemic**

ACTIVE INGREDIENT:	By Weight
Dichlobenil: (2, 6-dichlorobenzonitrile).....	50.0%
OTHER INGREDIENTS:	<u>50.0%</u>
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

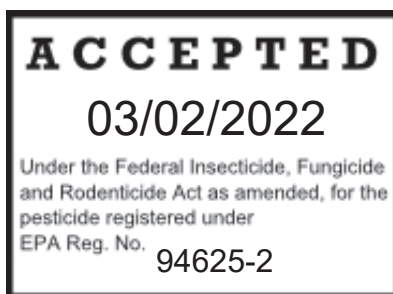
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
 (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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 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 mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
For additional information in case of emergency call toll free (1-800-858-7378). Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

See additional PRECAUTIONARY STATEMENTS, DIRECTIONS FOR USE, including STORAGE AND DISPOSAL inside booklet.

EPA Reg. No. 94625-2
 Manufactured for:
 Duke's Root Control, Inc.
 1020 Hiawatha Blvd., West
 Syracuse, NY 13204

EPA Est. No.
Net Weight: [1.5 oz.] [30 oz.]



{LANGUAGE INSIDE BOOKLET}

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All handlers must wear minimum of:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves such as barrier laminate, or polyethylene, or polyvinyl chloride (PVC) ≥14 mils, or viton ≥14 mils, or butyl rubber ≥14 mils, or natural rubber ≥14 mils, or neoprene rubber ≥14 mils or nitrile rubber ≥14 mils
- Chemical-resistant apron when mixing and loading

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

- Wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately, if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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 or at an approved waste disposal facility. Do not use in potable sewer 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.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in groundwater contamination.

This product must be used only where wastewater treated for root control will be processed through a wastewater treatment facility. Applicators must notify downstream wastewater treatment facilities [at least] 24 hours prior to the start of dichlobenil applications so that they may monitor the operations of the wastewater treatment plant. Applicators must report how much product will be applied to the sewage system to operators of downstream water treatment plants and to inform these operators that high concentrations of these chemicals in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

ENGINEERING CONTROLS STATEMENT

Water soluble packets, when used correctly, qualify as a closed mixing/loading system under the Worker Protection Standard [40 CFR 170.607(d)]. Mixers and loaders handling this product while it is enclosed in intact water soluble packets may elect to wear reduced PPE of long-sleeved shirt, long pants, shoes, socks, a chemical-resistant apron, and chemical-resistant gloves. When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for “applicators and other handlers” and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This package contains [a]30 oz. [**optional text:** [a]1.5 oz.] water soluble bag[s] for direct addition to the equipment mix tank when making foam applications of SANAFoam ROO-PRU.

USE PRECAUTIONS AND RESTRICTIONS

Not for use in septic systems in the State of Florida.

When used in inhabited buildings (residences, offices, hospitals, etc.) windows must be open or an exhaust fan must be operating during the application.

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 sewers to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps. Drains which may be subject to backup and flooding must be plugged. Follow the directions for measurement and use carefully to avoid using excess foam that may be forced up lateral lines to building drains. Do not use in storm, field or other drains unless effluent is treated in a sanitary sewer system. Use a squeegee, dust pan or wet vacuum and garbage bags for spills or backups and dispose of foam and liquid, wash area of spill or back up with water and detergent and flush down drain. If rugs or cloth are contacted, take outside and dry before laundering separately.

Do not use in confined areas without adequate ventilation. Avoid any entry into manholes or confined areas. When absolutely necessary to enter these areas, be sure to use all safety protection equipment and procedures as required by law.

PRODUCT INFORMATION

SANAFoam ROO-PRU is surface-active product for dilution in water to be used with a foaming agent [(included with this package)].

SANAFoam ROO-PRU is a non-systemic chemical for control of roots in sewer mains and drain lines. Only the roots and organic deposits in the sewer lines are affected by SANAFoam ROO-PRU.

SANAFoam ROO-PRU is not to be used to treat roots in storm sewers or other drains where the wastewater will not be treated or controlled.

SANAFoam ROO-PRU is only to be used with an approved foaming agent.

Instructions for Using Water Soluble Packages Directly into Spray tanks:

Water Soluble Packages (WSPs) are designed to dissolve in water. Agitation may be used, if necessary, to help dissolve the WSP. Failure to follow handling and mixing instructions can increase your exposure to the pesticide products in WSPs. WSPs, when used properly, qualify

as a closed mixing/loading system under the Agricultural Worker Protection Standard [40 CFR 170.607(d)]. Handling Instructions

Follow these steps when handling pesticide products in WSPs.

1. Mix in spray tank only.
2. Handle WSP(s) in a manner that protects package from breakage and/or unintended release of contents. If package is broken, put on PPE required for clean-up and then continue with mixing instructions.
3. Keep the WSP(s) in outer packaging until just before use.
4. Keep the WSP dry prior to adding to the spray tank.
5. Handle with dry gloves and according to the label instructions for PPE.
6. Keep WSP intact. Do not cut or puncture WSP.
7. Reseal the WSP outer packaging to protect any unused WSP(s).

DIRECTIONS FOR USE OF SANAFoAM ROO-PRU WITH TANK MIX OR ON DEMAND/IN LINE MIX

1. Determine which of the collection lines have known root problems.
2. Survey Treatment Area – Confirm the line size and length. Evaluate slope, flow, lateral connections, line length, outfall, line obstructions, terrain and other field conditions. A thorough evaluation prior to starting will assure safe and accurate application of SANAFoAM ROO-PRU.
3. Determine Quantity of Foam Needed - From Table 1 compute the quantity of foam required to fill the length of pipe (in feet) to be treated.

TABLE 1 Foam Requirements and Hose Retrieval Rates for SANAFoAM ROO-PRU

Pipe I.D. (inches)	Foam Capacities (gal./ft.)	Retrieval Rate (sec./10 ft.)
4	0.7	4.2
6	1.5	9.0
8	2.5	15.0
9	3.3	20.0
10	4.1	24.0
12	5.9	36.0
15	9.2	55.0
16	10.4	62.0
18	13.2	78.0
21	18.0	108.0
24	23.5	141.0
27	29.7	178.0

Example: An 8 in. pipe requires 2.5 gallons of foam per foot to fill the pipe. Therefore, 2500 gallons of foam are required to fill an 8 in. pipe 1000 feet in length (1000 ft. x 2.5 gal/ft. = 2500 gal).

4. Measurement Directions to Produce Desired Quantity of Foam

[The following table is for product packaged in 30 oz. water soluble bag sizes using a First Generation foaming agent:]

[TABLE 2 Mixing Instructions for Dilution with Foaming Agent for 30 oz. Water Soluble Bags]

Foam Requirement	Total Mix Volume	Water	Foaming Agent	Sanafoam Roo-Pru
2500 gal.	125.0 gal.	123.82 gal.	1.18 gal.	30 oz. (1 water soluble bag)
5000 gal.	250.0 gal.	247.63 gal.	2.37 gal.	60 oz. (2 water soluble bags)
7500 gal.	375.0 gal.	371.46 gal.	3.54 gal.	90 oz. (3 water soluble bags)

Example: 123.82 gallons of water plus one 30 oz. bag Sanafoam Roo-Pru and 1.18 gallons of foaming agent will produce 2500 gallons of foam.

[The following table is for product packaged in 1.5 oz. water soluble bag sizes using a First Generation foaming agent:]

[TABLE 2 Mixing Instructions for Dilution with Foaming Agent for 1.5 oz. Water Soluble Bags]

Foam Requirement	Total Mix Volume	Water	Foaming Agent	Sanafoam Roo-Pru
125 gal.	6.25 gal.	6.19 gal.	0.06 gal.	1.5 oz. (1 water soluble bag)
250 gal.	12.50 gal.	12.38 gal.	0.12 gal.	3.0 oz. (2 water soluble bags)
375 gal.	18.75 gal.	18.57 gal.	0.18 gal.	4.5 oz. (3 water soluble bags)

Example: 6.19 gallons of water plus one 1.5 oz bag of Sanafoam Roo-Pru and 0.06 gallons of foaming agent will produce 125 gallons of foam.

[The following table is for product packaged in 30 oz. water soluble bag sizes using a Second Generation foaming agent:]

[TABLE 2 Mixing Instructions for Dilution with Second Generation Foaming Agent for 30 oz. Water Soluble Bags]

Foam Requirement	Total Mix Volume	Water	Foaming Agent	Sanafoam Roo-Pru
2500 gal.	125.0 gal.	120 gal.	5 gal.	30 oz. (1 water soluble bag)
5000 gal.	250.0 gal.	240 gal.	10 gal.	60 oz. (2 water soluble bags)
7500 gal.	375.0 gal.	360 gal.	15 gal.	90 oz. (3 water soluble bags)

Example: 125 gallons of water plus one 30 oz. bag of Sanafoam Roo-Pru and 5 gallons of foaming agent will produce 2500 gallons of foam.

[The following table is for product packaged in 1.5 oz. water soluble bag sizes using a Second Generation foaming agent:]

[TABLE 2 Mixing Instructions for Dilution with Second Generation Foaming Agent for 1.5 oz. Water Soluble Bags]

Foam Requirement	Total Mix Volume	Water	Foaming Agent	Sanafoam Roo-Pru
125 gal.	5 gal.	4.75 gal.	0.25 gal.	1.5 oz. (1 water soluble bag)
250 gal.	10 gal.	9.5 gal.	0.50 gal.	3.0 oz. (2 water soluble bags)
375 gal.	15 gal.	14.25 gal.	0.75 gal.	4.5 oz. (3 water A soluble bags)

Example: 5 gallons of water plus one 1.5 oz bag of Sanafoam Roo-Pru and 0.25 gallons of foaming agent will produce 125 gallons of foam.

MIXING INSTRUCTIONS: TANK MIX

Follow the steps below when mixing this product, including if tank mixed with other pesticide products. If being tank mixed, the mixing directions 1 through 9 below take precedence over the mixing directions of the other tank mix products. WSPs may, in some cases, be mixed with other pesticide products so long as the directions for use of all mixed products do not conflict. Do not tank mix this product with products that prohibit tank mixing or have conflicting mixing directions.

1. If a basket or strainer is present in the tank hatch, remove prior to adding the WSP to the tank.
2. Fill Foammaker Equipment mix tank with water to approximately one-third to one-half of the desired final volume of spray.
3. Stop adding water and stop any agitation.
4. Place intact/unopened WSP(s) into the tank.

5. Do not spray water from a hose or fill pipe to break or dissolve the WSP(s).
 6. Start mechanical and recirculation agitation from the bottom of tank without using any overhead recirculation, if possible. If overhead recirculation cannot be turned off, close the hatch before starting agitation.
 7. Dissolving the WSP(s) may take up to 5 minutes or longer, depending on water temperature, water hardness and intensity of agitation.
 8. Stop agitation before tank lid is opened.
 9. Open the lid to the tank, exercising caution to avoid contact with dusts or spray mix, to verify that the WSPs have fully dissolved and the contents have been thoroughly mixed into the solution.
 10. Do not add other allowed products or complete filling the tank until the bags have fully dissolved and pesticide is thoroughly mixed.
- [11.] Remove the inner containers containing the foaming agent as needed.]
- [12 or 13.] Transfer the liquid from the foaming agent container as necessary into the Foamaker solution mix tank using the suction pump system on the Foamaker.
- [13 or 14.] Triple rinse the foaming agent container (again using the suction pump system to add the rinse water to the mix tank).
- [14 or 15]. Once the WSP have fully dissolved and any other products have been added to the tank, resume filling the tank with water to the desired level, close the tank lid, and resume agitation.
- [15 or 16]. Dispose of containers in accordance with disposal instructions.
- [16 or 17]. Use the spray solution when mixing is complete.
- [17 or 18]. Maintain agitation of the diluted pesticide mix during transport and application.
- [18 or 19]. It is unlawful to use any registered pesticide, including WSPs, in a manner inconsistent with its label.

MIXING INSTRUCTIONS: ON DEMAND/INLINE MIX

Follow the steps below when mixing this product, including if tank mixed with other pesticide products. If being tank mixed, the mixing directions 1 through 9 below take precedence over the mixing directions of the other tank mix products. WSPs may, in some cases, be mixed with other pesticide products so long as the directions for use of all mixed products do not conflict. Do not tank mix this product with products that prohibit tank mixing or have conflicting mixing directions.

1. If a basket or strainer is present in the tank hatch, remove prior to adding the WSP to the tank.
2. Fill the Dichlobenil mix tank with water to approximately one-third to one-half of the desired final volume of spray.
3. Stop adding water and stop any agitation.
4. Place intact/unopened WSP(s) into the tank.
5. Do not spray water from a hose or fill pipe to break or dissolve the WSP(s).
6. Start mechanical and recirculation agitation from the bottom of tank without using any overhead recirculation, if possible. If overhead recirculation cannot be turned off, close the hatch before starting agitation.
7. Dissolving the WSP(s) may take up to 5 minutes or longer, depending on water temperature, water hardness and intensity of agitation.
8. Stop agitation before tank lid is opened.
9. Open the lid to the tank, exercising caution to avoid contact with dusts or spray mix, to verify that the WSPs have fully dissolved and the contents have been thoroughly mixed into the solution.
10. Do not add other allowed products or complete filling the tank until the bags have fully dissolved and pesticide is thoroughly mixed.

11. Place 1.18 gallons of foam concentrate in a five gallon container and fill the container with water up to the five gallon mark.
12. Once the WSP have fully dissolved and any other products have been added to the tank, resume filling the tank with water to the desired level, close the tank lid, and resume agitation.
13. Connect the liquid from the 5 gallon container to the suction pump on the Foamaker.
14. Dispose of empty containers in accordance with the STORAGE AND DISPOSAL instructions below.
15. Use the spray solution when mixing is complete.
16. Maintain agitation of the diluted pesticide mix during transport and application.
17. It is unlawful to use any registered pesticide, including WSPs, in a manner inconsistent with its label.

[The following instructions will appear if using instructions for a Second Generation Foaming agent.]

MIXING INSTRUCTIONS With Second Generation Foaming Agent:

ON DEMAND/INLINE MIX

Follow the steps below when mixing this product, including if tank mixed with other pesticide products. If being tank mixed, the mixing directions 1 through 9 below take precedence over the mixing directions of the other tank mix products. WSPs may, in some cases, be mixed with other pesticide products so long as the directions for use of all mixed products do not conflict. Do not tank mix this product with products that prohibit tank mixing or have conflicting mixing directions.

1. If a basket or strainer is present in the tank hatch, remove prior to adding the WSP to the tank.
2. Place intact/unopened WSP(s) into the tank.
3. Do not spray water from a hose or fill pipe to break or dissolve the WSP(s).
4. Connect the liquid from the 5 gallon container of foaming agent to the suction pump on the Foamaker.
5. Transfer 5 gallons of foaming agent into mix tank with suction pump on the Foamaker.
6. Start mechanical and recirculation agitation from the bottom of tank without using any overhead recirculation, if possible. If overhead recirculation cannot be turned off, close the hatch before starting agitation.
7. Dissolving the WSP(s) may take up to 5 minutes or longer, depending on water temperature, water hardness and intensity of agitation.
8. Stop agitation before tank lid is opened.
9. Open the lid to the tank, exercising caution to avoid contact with dusts or spray mix, to verify that the WSPs have fully dissolved and the contents have been thoroughly mixed into the solution.
10. Do not add other allowed products or complete filling the tank until the bags have fully dissolved and pesticide is thoroughly mixed.
11. Dispose of empty containers in accordance with the STORAGE AND DISPOSAL instructions below.
12. Use the spray solution when mixing is complete.
13. Maintain agitation of the diluted pesticide mix during transport and application.
14. It is unlawful to use any registered pesticide, including WSPs, in a manner inconsistent with its label.

USE SOLUTION PROMPTLY AFTER MIXING. Wash and flush all equipment with water after each day's use.

KEEP OFF DESIRABLE LAWNS AND PLANTS. If spillage occurs on the street or other paved areas near growing plants, immediately flush the spill thoroughly with water at moderate pressure into the sewer line.

APPLICATION GUIDELINES FOR SANAFoAM ROO-PRU

TO APPLY FOAM TO MAIN LINES: Insert foam discharge hose through entire section of line to be treated. Start foam generating equipment and withdraw discharge hose at a rate calibrated to fill the pipe line to capacity (as listed in Table 1), until foam appears at input manhole. Use appropriate foam application equipment designed to produce required foam volume.

You may multiply the retrieval rates in Table 1 by 1.10 to allow for some treatment of laterals (about 3-6 feet) and to allow more foam to push into cracks and broken joints.

IF TREATING A BUILDING LATERAL: Be sure foam application discharge hose is also of a specialized type and is securely positioned into and inflated in the clean-out to prevent foam overflow and/or plug blowout. Operate foam generating equipment until required amount of foam has been produced, as calculated from information in Table 1.

FOAMAKER Generators are manufactured for Duke's Root Control, Inc. to our specifications and are available from Duke's Root Control, Inc.

For additional information on special applications, contact sales representative of manufacturer. All application procedures must be in accordance with established methods and systems as developed by Duke's Root Control, Inc.

TO APPLY TO STORM LINES: Apply SANAFoAM ROO-PRU in a storm line using the foam requirements and Hose Retrieval Rates found in TABLE 1. In pipe sizes larger than 12", use the Foam Coat Nozzle. In high flow situations, mount the nozzle to a skid to ensure nozzle remains out of the flow; this will help ensure sufficient chemical is getting on the roots.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetative matter. Do not store near pet or livestock quarters. Store in a cool, dry, and well ventilated area. Do not open the protective bag outer tube until water soluble bag is needed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility.

CONTAINER HANDLING: Plastic Bag – Remove the water soluble bag from the outer protective plastic bag before use in application equipment. Then offer for recycling if available or dispose of empty outer plastic bag in the trash as long as WSP is unbroken.

Outer Fiberboard Container and Other Containers: Nonrefillable container. Do not reuse or refill this container. Completely empty containers into application equipment. Then offer for recycling if available, or dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

SPECIAL NOTICE

To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

[EPA Approval Date]

[Optional text appears in brackets – the final label may include some or all of the optional text]
 [Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

{LANGUAGE ON LABEL AFFIXED TO CONTAINER}

DICHOLOBENIL GROUP 20 HERBICIDE

SANAFOAM ROO-PRU

[Alternate Brand Name: Roo-Pru]

**A Foaming Fumigant
 Rids Sewer [and Storm] Lines of Roots
 Will Not Harm Trees, Non-Systemic**

ACTIVE INGREDIENT:	By Weight
Dichlobenil: (2, 6-dichlorobenzonitrile).....	50.0%
OTHER INGREDIENTS:	50.0%
TOTAL:	100.0%

**KEEP OUT OF REACH OF CHILDREN
 CAUTION**

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.)

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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 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 mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
For additional information in case of emergency call toll free (1-800-858-7378). Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

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

Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing.

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 or at an approved waste disposal facility. Do not use in potable sewer 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.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in groundwater contamination.

This product must be used only where wastewater treated for root control will be processed through a wastewater treatment facility. Applicators must notify downstream wastewater treatment facilities [at least] 24 hours prior to the start of dichlobenil applications so that they may monitor the operations of the wastewater treatment plant. Applicators must report how much product will be applied to the sewage system to operators of downstream water treatment plants and to inform these operators that high concentrations of these chemicals in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetative matter. Do not store near pet or livestock quarters. Store in a cool, dry, and well ventilated area. Do not open the protective bag outer tube until water soluble bag is needed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility.

CONTAINER HANDLING: Plastic Bag – Remove the water soluble bag from the outer protective plastic bag before use in application equipment. Then offer for recycling if available or dispose of empty outer plastic bag in the trash as long as WSP is unbroken.

Outer Fiberboard Container and Other Containers: Nonrefillable container. Do not reuse or refill this container. Completely empty containers into application equipment. Then offer for recycling if available, or dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

SPECIAL NOTICE

To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

See label booklet for additional PRECAUTIONARY STATEMENTS and DIRECTIONS FOR USE.

EPA Reg. No. 94625-2
 Manufactured for:
 Duke's Root Control, Inc.
 1020 Hiawatha Blvd., West
 Syracuse, NY 13204

EPA Est. No.

Net Weight:

[Optional text appears in brackets – the final label may include some or all of the optional text]
[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

{LANGUAGE ON LABEL AFFIXED TO WSP IN FOIL BAG}

SANAFOAM ROO-PRU

[Alternate Brand Name: Roo-Pru]

**A Foaming Fumigant
Rids Sewer [and Storm] Lines of Roots
Will Not Harm Trees, Non-Systemic**

ACTIVE INGREDIENT:	By Weight
Dichlobenil: (2, 6-dichlorobenzonitrile).....	50.0%
OTHER INGREDIENTS:	<u>50.0%</u>
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See label booklet for FIRST AID, PRECAUTIONARY STATEMENTS and DIRECTIONS FOR USE including STORAGE AND DISPOSAL language.

EPA Reg. No. 94625-2

Manufactured for:
Duke's Root Control, Inc.
1020 Hiawatha Blvd., West
Syracuse, NY 13204

EPA Est. No.

Net Weight:

Batch No._____