

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 28 1996

Occidental Chemical Corporation
Technical Center, V-81
P.O. Box 344
Niagara Falls, NY 14302

Attention: Walter F. Suchanek
Senior Regulatory Specialist

Subject: Towerbrom 90M, Three Inch Tablets
EPA Registration Number 935-75
Eight Month Response to the Chlorinated Isocyanurate
Reregistration Eligibility Document (RED)

The amendment referred to above, submitted in response to the Reregistration Eligibility Document, in accordance with section 4(g)(2)(b) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the following comments:

1. The Precautionary Statements should read:

"Corrosive. Causes irreversible eye damage or skin burns. May be fatal if swallowed. Harmful if absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing dust. Wear goggles or face shield. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse.

2. The Statements of Practical Treatment should read:

IF SWALLOWED: Call a physician or Poison Control Center. Drink large amounts of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

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

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferable mouth-to-mouth. Get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

3. The Child-resistant packaging is recommended for products which are intended for residential use.
4. Delete "& related Isocyanurates" from the ingredient statement.

A stamped copy is enclosed for your records. Submit one copy of the final printed label before you release the product for shipment bearing the amended label.

If you have any questions concerning this letter, please contact Delores Williams at (703) 305-7109.

Sincerely,



Walter C. Francis
Acting Product Manager (32)
Antimicrobial Program Branch
Registration Division (7505C)

TOWERBROM® 90M, THREE INCH TABLETS

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE. CAUSES EYE AND SKIN DAMAGE. IRRITATING TO NOSE AND THROAT. HARMFUL OR FATAL IF SWALLOWED.

Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Avoid breathing dust or fumes. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARD

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer system without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of EPA.

PHYSICAL OR CHEMICAL HAZARD

STRONG OXIDIZING AGENT. Will burn with the evolution of chlorine and equally toxic gases. Contact with water slowly liberates irritating and hazardous chlorine containing gases. Decomposes at 460°F to 480°F with liberation of harmful gases.

Mix only with water. Use clean, dry utensils. **DO NOT** add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture, organic material, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible fire and explosion.

IN CASE OF FIRE OR SMOKE:

If possible, isolate in open air or well ventilated area. Flood with large volume of water.

IN CASE OF CONTAMINATION OR DECOMPOSITION: DO NOT reseal container.

STORAGE AND DISPOSAL

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

STORAGE: Keep container tightly closed. Store in a dry place. **DO NOT ALLOW WATER TO GET INTO CONTAINER.** Keep container off wet floors.

PESTICIDE DISPOSAL: Pesticide wastes are acutely toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Clean equipment and/or dispose of equipment wash water in a manner to avoid contamination of water resources.

CONTAINER DISPOSAL:

For Fibre Drums: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration as allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

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

ACTIVE INGREDIENT:	
Trichloro-s-triazinetriene and related isocyanurates.....	92.9%
Sodium Bromide.....	6.9%
INERT INGREDIENTS.....	0.2%
	100.0%

Contains 83% available bromine
Provides 187% available bromine with continued use in accordance with the Directions for Use

TOWERBROM 90M is a high performance bromine microbicide. When used as directed, TOWERBROM 90M THREE INCH TABLETS will aid in the control of organic slimes of algae, bacteria and fungi in recirculation water of condensing and cooling equipment.

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT (FIRST AID)

IF SWALLOWED, drink large amounts of water. **DO NOT** induce vomiting. Avoid alcohol. Call a physician or poison control center immediately.

IF IN EYES, flush with plenty of water for 15 minutes. Get medical attention.

IF ON SKIN: Immediately brush off excess chemical and flush with plenty of water. Remove contaminated clothing. Wash clothing before reuse. **GET MEDICAL ATTENTION** if irritation persists.

IF INHALED: Remove to fresh air. **GET MEDICAL ATTENTION.**

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

See side panel for DIRECTIONS FOR USE

EPA Est. No. 58401-MO-1
EPA Reg. No. 935-75

Occidental Chemical Corporation
Basic Chemicals Group
Dallas, Texas 75380
214-404-3800
24 Hour Emergency Phone: 1-800-733-3665

NET WT 50LBS./22.7 KG

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling

RECIRCULATING COOLING WATER SYSTEMS

TOWERBROM 90M THREE INCH TABLETS aid in the control of bacterial, fungal and algal slimes in evaporative condensers, heat exchanger water systems, commercial and industrial cooling towers, ornamental fountains, influent systems such as flow through filters, lagoons, industrial water scrubbing systems and cooling systems for brewery pasteurizers. This product may be added to the system continuously or intermittently as needed by the direct placement of THREE INCH TABLETS into the water at a point where the dissolved THREE INCH TABLETS will be uniformly mixed. The frequency of feeding and duration of the treatment will depend on the severity of the contamination. Badly fouled systems must be cleaned before treatment is begun.

FOR CONTROL OF BACTERIA, FUNGI AND ALGAE

Intermittent or slug method

Initial Dose: When the system is noticeably fouled, add TOWERBROM 90M THREE INCH TABLETS at the rate of 0.5 to 1.0 pounds (1-3 tablets) per 1000 gallons of water (60-120 ppm) in the system to achieve 1-5 ppm total residual halogen as chlorine, as measured by a suitable test kit. Repeat dosage until residual is achieved.

Subsequent Dose: When microbial control is evident, add TOWERBROM 90M THREE INCH TABLETS at the rate of 0.1 to 0.5 pounds (1/4-1 tablet) per 1000 gallons of water in the system to achieve 1 ppm total residual halogen as chlorine, as determined by a suitable test kit. Repeat dosage until residual is achieved.

Continuous feed method

Initial Dose: When the system is noticeably fouled, add TOWERBROM 90M THREE INCH TABLETS at the rate of 0.5 to 1.0 pounds (1-3 tablets) per 1000 gallons of water in the system to achieve 1-5 ppm total residual halogen as chlorine, as measured by a suitable test kit. Repeat dosage until residual is achieved.

Subsequent Dose: When microbial control is evident, add TOWERBROM 90M THREE INCH TABLETS at the rate of 0.1 to 0.1 pounds (1/4 - 1 tablet) per 1000 gallons of water in the system to achieve 1 ppm total residual halogen as chlorine, as determined by a suitable test kit. Repeat dosage until residual is achieved.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 28 1996

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

935-75

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