



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 28 2004

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Walton F. Suchanek
Occidental Chemical Corporation
520 Monsanto Avenue
Sauget, IL. 62206-1188

SUBJECT: November 5, 2003 Amendment application
Towerbrom 90M Tablets
EPA Registration Number 935-75

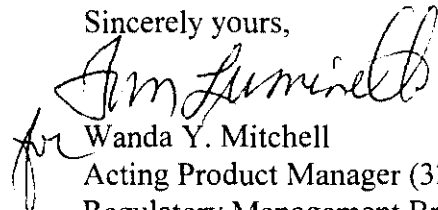
Dear Mr Suchanek:

The amendment referred to above, submitted in connection with registration under Section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the following conditions. The Spas, Hot-Tubs, Immersion and Hydrotherapy Tanks use is not supported by the Chlorinated Isocyanurates Reregistration Eligibility Decision (RED) and can not be approved. In order to add this use to your label, you must cite a substantially similar EPA approved product and comply with the data compensation requirements set forth in 40 CFR § 152.80 (Subpart E).

In summary, your request to add swimming pool use directions to your label is approved. You must also correct the typo at Available Bromine. You must also revise the word Corrosive to appear in bold type and as all capital letters.

A copy of your stamped label is enclosed. If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,


for Wanda Y. Mitchell
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobial Division (7510-C)

OxyChem® TOWERBROM® 90M TABLETS

ACTIVE INGREDIENTS:

Trichloro-s-triazinetrione..... 92.9%
Sodium Bromide..... 6.9%

INERT INGREDIENTS..... 0.2%

TOTAL..... 100.0%

Provides 83% Available Chlorine
Provides 187% Available Bromine

verify not typo

When used as directed, this product is a high performance bromine microbiocide which will control organic slimes of algae, bacteria and fungi when used in accordance with the Directions for Use.

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
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 swallowed	<ul style="list-style-type: none"> Call 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 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 by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-733-3665 for 24 hour emergency medical treatment information.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

See side panel for *Directions for Use*.

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

Occidental Chemical Corporation
Dallas, Texas 75380
972-404-3800

ACCEPTED
with COMMENTS
in EPA Letter Dated:

HMS RATING SYSTEM: HEALTH 3 FLAMMABILITY 0 REACTIVITY 2

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Net Wt. 50 lbs. / 22.7 kg.

935-75

...side,
...not a
...side,
...side,

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

All caps &
bold

DANGER

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.

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 other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARD

STRONG OXIDIZING AGENT. Contact with water slowly liberates irritating and hazardous chlorine and bromine containing gases. Decomposes at temperatures above 437°F with liberation of harmful gases. When ignited, will burn with the evolution of chlorine and equally toxic gases.

ALWAYS add product to large quantities of 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.

When shock feeding, product should not sit in stagnant water after the feeder shuts off. Purge the feeder with a minimal air or water flow between shock treatments.

IN CASE OF FIRE OR SMOKE:

Call the fire department. Do not attempt to extinguish the fire without a self contained breathing apparatus (SCBA). Do not let the fire burn. **Flood with copious amounts of water. DO NOT** use ABC or other dry chemical extinguishers since there is the potential for a violent reaction.

IN CASE OF CONTAMINATION OR DECOMPOSITION: DO NOT reseal container. Follow disposal instructions on label.

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DIRECTIONS FOR USE

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

FOR CONTROL OF BACTERIA, FUNGI AND ALGAE IN RECIRCULATING WATER SYSTEMS, SEWAGE WASTEWATER SYSTEMS, PULP AND PAPER MILL WATER SYSTEMS AND ONCE THROUGH WATER SYSTEMS

FOR RECIRCULATING WATER SYSTEMS

This product is intended for use in the following aquatic sites: Air Washer Water Systems, Commercial/Industrial Water Cooling Systems, Evaporative Condenser Water Systems, Ornamental Ponds and Aquaria, Heat Exchange Water Systems, Lakes/Ponds/Reservoirs (Without Human or Wildlife Use), Industrial Scrubbing Systems, Industrial Auxiliary Water Systems, Industrial Process Water, Industrial Disposal Systems, Pasteurizer/Warmer/Cannery Cooling Water Systems.

This product may be added to the system continuously or intermittently as needed with a wide variety of tablet dissolving devices (feeders, bags, buckets, etc.) or by direct placement into the water at a point where the product will be uniformly mixed with water. 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 begins.

Intermittent or slug method

INITIAL DOSE: When the system is noticeably fouled, add this product at the rate of 0.1 to 0.5 pounds per 1000 gallons (12 to 60 grams per 1000 liters) in the system to achieve 0.5-10 mg/L total available halogen as chlorine, as measured by a suitable test kit. Repeat dosage until residual is achieved.

SUBSEQUENT DOSE: When microbial control is evident, add this product at the rate of 0.02 to 0.1 pounds per 1000 gallons (2.4 to 12 grams per 1000 liters) in the system to achieve 0.5-1 mg/L total available halogen as chlorine, as measured by a suitable test kit. Repeat periodically as needed to maintain control.

Continuous feed method

INITIAL DOSE: When the system is noticeably fouled, add this product at the rate of 0.1 to 0.5 pounds per 1000 gallons (12 to 60 grams per 1000 liters) in the system to achieve 0.5-10 mg/L total available halogen as chlorine, as measured by a suitable test kit. Repeat dosage until residual is achieved.

SUBSEQUENT DOSE: When microbial control is evident, add this product at the rate of 0.02 to 0.1 pounds per day per 1000 gallons (2.4 to 12 grams per day per 1000 liters) in the system to maintain 0.5-1 mg/L total available halogen as chlorine, as measured by a suitable test kit.

ACCEPTED
WITH COMMENTS

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FOR SEWAGE WASTEWATER SYSTEMS

This product is intended for use in sewage wastewater systems. This product provides rapid disinfection of primary, secondary and tertiary wastewater treatment systems.

DOSE RATE: Add this product at the rate of 0.02 to 0.5 pounds per 1000 gallons (2.4 to 60 grams per 1000 liters) in the system to achieve 0.2-3 mg/L total available halogen as chlorine, as measured by a suitable test kit, at the injection point in the disinfection contact chamber. Adjust the dosage to achieve disinfection and minimize the halogen concentration at the exit of the contact chamber.

FOR PULP AND PAPER MILL WATER SYSTEMS

This product is intended for use in pulp and paper mill water systems.

INITIAL DOSE: When the system is noticeably fouled, add this product at the rate of 0.04 to 2 pounds per ton (0.02 to 1.0 kg. per metric ton) of dry pulp or paper produced to achieve 0.1-5 mg/L total available halogen as chlorine, as measured by a suitable test kit, in the water treated. Repeat dosage until residual is achieved.

SUBSEQUENT DOSE: When microbial control is evident, add this product at the rate of 0.04 to 1.0 pounds per ton (0.02 to 0.5 kg. per metric ton) of dry pulp or paper produced to achieve 0.1-5 mg/L total available halogen as chlorine, as measured by a suitable test kit, in the water treated. Repeat periodically as needed to maintain control.

FOR ONCE-THROUGH WATER SYSTEMS

This product is intended for use in open or closed cycle, fresh or salt water, once-through cooling systems.

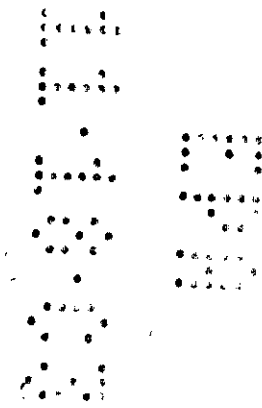
INITIAL DOSE: When the system is noticeably fouled, add this product at the rate of 0.02 to 0.5 pounds per 1000 gallons (2.4 to 60 grams per 1000 liters) of water treated to achieve 0.2-10 mg/L total available halogen as chlorine, as measured by a suitable test kit, through the portion of the system to be treated. Repeat dosage until residual is achieved.

SUBSEQUENT DOSE: When microbial control is evident, add this product at the rate of 0.02 to 0.1 pounds per 1000 gallons (2.4 to 12 grams per 1000 liters) of water treated to achieve 0.2-5 mg/L total available halogen as chlorine, as measured by a suitable test kit, through the portion of the system to be treated. Repeat periodically as needed to maintain control.

ACCEPTED
with COMMENTS
in EPA Letter dated

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AQUATIC NON-FOOD RESIDENTIAL:

SWIMMING POOL WATER SYSTEMS

This product is intended for use in controlling bacteria and algae in indoor swimming pools. This product should not be used in outdoor swimming pools. This slow dissolving product is to be used in suitable brominating/chlorinating devices. DO NOT add directly to the swimming pool.

Re-entry into treated swimming pools is prohibited above levels of 6 ppm available bromine (3 ppm as chlorine).

Start up - Before using this product, make sure that the filtration system is clean and operating properly. Adjust the pH of the water to the range of 7.2-7.6 using suitable products and a reliable test kit. Adjust the alkalinity of the water to a minimum of 125 ppm (mg/L), based on the test kit reading.

Shock (superchlorinate) the pool with an appropriate product, followed by maintenance treatment.

Shock treatment - The pool water should be superchlorinated or shocked every seven days or whenever the *combined* chlorine level is above 0.5 ppm (mg/L). *Combined* chlorine is the difference between *total* and *free* chlorine, as measured by a suitable test kit.

Add a sufficient amount of an appropriate *shock* product directly to the surface of circulating water to raise the available chlorine level to 5-6 ppm (mg/L), based on test kit readings. For example, the addition of 10 ounces of sodium dichloro-s-triazinetrione per 10,000 gallons of water (7.5 grams per 1,000 liters) will provide approximately 5 ppm (mg/L) of available chlorine. If the combined chlorine reading is not below 0.5 ppm (mg/L) and the water has not been restored to its normal clarity, repeat the shock treatment described above.

Do not enter water until free available chlorine reading is below 3 ppm (mg/L), combined chlorine is below 0.5 ppm (mg/L) and the water is restored to its normal clarity.

Maintenance treatment - Add this product to the feeder (brominating or chlorinating device). Adjust the feeder to maintain the free available bromine level in the water at 2-6 ppm (mg/L) (1-3 ppm as chlorine) as indicated by a reliable bromine or chlorine test kit. Periodically refill feeding device with enough tablets to assure a constant treatment level of 2-6 ppm (mg/L) available bromine. Weather and usage effect sanitizer levels. In addition, some oils, lotions, fragrances, cleaners, etc. may cause foaming or cloudy water as well as reduce the efficiency of this product. Maintain the pH at 7.2-7.6 and the alkalinity at a minimum of 125 ppm (mg/L).

When the total dissolved solid (TDS) reaches 3000 ppm (mg/L) or whenever the water becomes difficult to manage, the water should be drained and fresh water added to the pool.

Winterizing - Thoroughly clean and vacuum the pool. Empty the feeder of all tablets. While the water is still clear and clean, add 16 ounces of an appropriate *shock* product for each 10,000 gallons of water (12 grams per 1,000 liters), while the filtration system is running. This will increase the available bromine by approximately 16 ppm (mg/L) (8 ppm as chlorine). Cover pool, prepare heater, filter and heater components for winter by following manufacturers' instructions.

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STORAGE AND DISPOSAL

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

STORAGE: Keep material dry and in a dry area. Store in original container where temperatures do not exceed 125°F (52 °C) for 24 hours. Keep container tightly closed.

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 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. The preferred disposal methods are incineration or chemical treatment in accordance with Federal, State and Local regulations.

Do not put product, spilled product, or filled or partially filled containers into the trash or waste compactor. Contact with incompatible materials could cause a reaction and fire. DO NOT transport wet or damp material.

CONTAINER DISPOSAL:

BULK BIN: Return empty bulk bin for reuse. Do not vacuum, wash, or clean inside of bin.

BULK BAG: Completely empty bag into application equipment. Remove and triple rinse polyethylene liner. Dispose of empty bag and liner in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke. Do not reuse bag.

FIBER DRUM: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Remove and triple rinse polyethylene liner. 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.

PLASTIC DRUM: 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.

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with COMMENTS
In EPA's eHazard
JAN 28 2004