UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

935-78-

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MAY 28 1995

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

PM

Attention: Walter F. Suchanek Senior Regulatory Specialist

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Subject: Towerbrom 9010 Tablets, Three Inch Tablets EPA Registration Number 935-78 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 Precutionary Statements should read:

"Corrosive. Causes irreversible eye damage or skin burns. May be fatal is 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		
EPA Form 1320-1A (1/90)	Printed on Recycled Paper	OFFICIAL FILE COPY

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

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

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 authonity. 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 andequally 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 lightly 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 insate 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 neurest LPA Regiunal CfLos for guidance. Clean equipment and /or dispose if 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 landlill or by incheration as allowed by state and local extbohrtins. If drum is contaminated and caunot be reused, dispose of in the same rist.nier. For Plastic Pars: inply fillse for equivalent). Then offer to recycling or reconditioning for puncture and dispose of in a sunitary landfill, or incineration, or, if allowed by State and local authomiles, by burning. If burned, stay out of c smoke.

TOWERBROM® 9010 TABLETS, THREE INCH TABLETS BROMINE GENRATING TABLETS

ACTIVE INGREDIENT:

Trichloro-s-triazinetrione and related isocyanurates	
Sodium Bromide	9.8 %
INERT INGREDIENTS	0.2%
	100.0%

Contains 79.2% available: Provides 176% available: Directions for Use

TOWERBROW 9010 TABLETS, Three inch Tablets consist of two active ingredients. When dissolved in water, the tablets release hypochrouse acid which reacts with soldum bromkle consisted in the tablets to produce hypothermous acid. Hypothermous acid produced from TOWERBROW 9010 TABLETS, Three Inch Tablets is a disinfectant which will control organic allmas of algae, becteriz 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

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EPA Est. No. 58401-MO-1 EPA Reg. No. 935-78 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 tabeling

RECIRCULATING AND ONCE-THROUGH COOLING WATER SYSTEMS

TOWERBROM 9010 TABLETS, THREE INCH TABLETS aid in the control of bacterial, fungal and algal silmes 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 and non-contact cooling systems for brewery pasteurizers. This, product may be added to the system continuously or intermittently as needed. 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 9010 TABLETS, 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 chiorine, as measured by a suitable test kit. Repeat dosage until residual is achieved.

Subsequent Dose: When microbial control is evident, add TOWERBROM 9010 TABLETS, 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 9010 TABLETS, 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 pom total residual halogen as chiorine, as measured by a suitable test kit. Repeat dosage until residual is achieved.

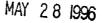
Subsequent Dose: When microbial control is evident, add TOWER8ROM 9010 TABLETS, THREE INCH TABLETS at the rate of 0.1 to 0.1 pounds (1/4 - 1 tablet) per 1000 gallons of water in the system to achieve 1 ppm total residual halogen as chlorine, as determined by a suitable test kit. Repeat dosage until residual is achieved.

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ACCEPTED with CCMMENTS in EPA Letter Dated:



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