

3377-61

10/15/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

October 15, 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ann M. Oxford
Manager, Regulatory Affairs
Albemarle Corporation
541 Florida Street
Baton Rouge, LA 70801

Subject: ALBROM 100PC Disinfectant
EPA Registration No. 3377-61
Application Date: July 18, 2008
Receipt Date: July 28, 2008

Dear Ms. Oxford:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable:

- Addition of toll free number
- Addition of alternate Environmental Hazards Statement
- Addition of specific PPE to Precautionary Statement
- Update to Physical and Chemical Hazards
- Replacement of product name with "this product" in Directions for Use
- Addition of directions for a tear-open packet
- Separation of Storage & Disposal Statement into "residential" and "commercial" sections
- Addition of two optional marketing statements and a Responsible Care graphic

General Comments

A stamped copy of the accepted labeling is enclosed. Submit 1 copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Henson at 703-308-6345.

Sincerely,

Emily H. Mitchell
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES

EMBOLE	7510P	7510P					
JRNAME	EEBerg	Henson					

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ALBROM® 100PC DISINFECTANT

For Use In Disinfection of Pools, Spas and Hot Tubs and to Control Microbial Growth in Decorative Waters

For Use in the Disinfection of Salon Foot Spas

Active Ingredient	
1,3-dibromo-5,5-dimethylhydantoin.....	99.4%
Other Ingredients	0.6%
Total.....	100.0%

Available bromine: 111%

KEEP OUT OF REACH OF CHILDREN DANGER

See side/back panel for additional precautionary statements

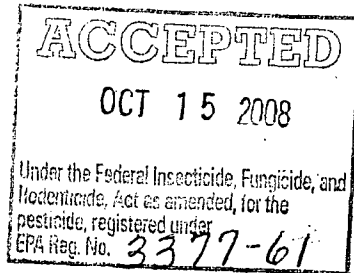
EPA Registration No. 3377-61
EPA Est.: _____

ALBEMARLE CORPORATION
451 Florida Street
Baton Rouge, LA 70801

In case of emergency endangering life or property involving this product, call collect (225) 344-7147

[Alternate statement: In case of medical emergency involving this product, call 800-xxx-xxxx]

Net Contents _____



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

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

FIRST AID

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 advice.

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 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 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 further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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

ENVIRONMENTAL HAZARDS [for 50 pound packages and larger. Certain packages less than 50 pounds may use the first sentence of the paragraph.]

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 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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS

Strong oxidizing and brominating agent. Avoid contact with reducing agents, acids, ammonia-containing products, organic materials (such as aldehydes and alcohols) and other oxidizing agents (such as calcium hypochlorite). Do not mix with other chemicals. Mix only with water. Never add water to product, always add product to large quantities of water. 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 or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases and possible generation of fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well-ventilated area. Flood with large volumes of water, if necessary.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with the labeling. Read entire label and use strictly in accord with precautionary statements and Directions for Use.

DISINFECTING SPAS AND HOT TUBS

When used as directed, this product [or use brand name] is an effective disinfectant for your spa or hot tub water, keeping it clean, clear and free of odor. This product gives the effectiveness of chlorine without the chlorine odor. Take a sample of spa water to your authorized [brand] dealer regularly for a detailed analysis.

To start up a new spa or one recently drained, clean all surfaces, back flush or clean the filter, chemically balance the calcium hardness and total alkalinity, treat for iron, copper and manganese, if present. Adjust the pH to 7.2 - 7.8, prior to initiating treatment with this product.

Place this product in suitable feeder. Adjust the feeder according to the manufacturer's directions to maintain an active bromine level between 2 - 4 ppm in residential spas and 3 - 6 ppm in commercial spas. Check your feeder regularly and add additional product as needed. Maintenance of residual is dependent on water temperature, light intensity and bather load, and requires frequent checks with a test kit. Use a reliable test kit for the bromine measurements. The pump and filter should be operated at least three hours every day regardless of use. Outdoor hot tubs and spas may require more frequent cleaning and treatment with this product.

To maintain clear, clean water and ensure performance of your spa or hot tub chemicals, water should be drained and spa or hot tub refilled with fresh water every 60 days.

[The following directions for use will be only used to label a disposable feeding device with product inside.]

**DISINFECTING SPAS AND HOT TUBS WITH THE
[insert the brand name of the disposable dispenser]**

When used as directed, this product [or use brand name] is an effective disinfectant for your spa or hot tub water, keeping it clean, clear and free of odor. This product gives the effectiveness of chlorine without the chlorine odor. Take a sample of spa water to your authorized [brand] dealer regularly for a detailed analysis.

Start Up: To start up a new spa or one recently drained, clean all surfaces, back flush or clean the filter, chemically balance the calcium hardness and total alkalinity, treat for iron, copper and manganese, if present. Adjust the pH to 7.2 - 7.8, prior to initiating treatment with this product.

Adjust the [Optional: BRAND NAME] dispenser according to the manufacturer's directions to maintain an active bromine level between 2 - 4 ppm in residential spas and 3 - 6 ppm in commercial spas. Maintenance of residual is dependent on water temperature, light intensity and bather load, and requires frequent checks with a test kit. Use a reliable test method for the bromine measurements. The pump and filter should be operated at least three hours every day regardless of use. Replace the [Optional: BRAND NAME] dispenser when empty.

Maintenance: To maintain clear, clean water and ensure performance of your spa or hot tub chemicals, water should be drained and spa or hot tub refilled with fresh water every 60 days.

DISINFECTION OF SWIMMING POOLS

Initial Application

Ensure all equipment is working properly. Backwash the filter system following the manufacturer's directions. Chemically balance the calcium hardness to 200 ppm and total alkalinity to 100 - 150 ppm. Adjust the pH to 7.2 - 7.8. Fill suitable feeder with this product. Adjust the flow of water into the feeder according to the manufacturer's directions to maintain an active bromine residual between 1 - 4 ppm as Br₂ in the pool (approximate use rate of 0.5 ounces per 1000 gallons of water). Maintenance of residual

is dependent on ambient temperature, light intensity and bather load, and requires frequent checks with a test kit. Use a reliable test kit to measure bromine residual. The pump and filter should be operated at least eight hours every day regardless of use. Outdoor pools may require longer filtering and consume higher amounts of this product.

Continued Application

Check the feeder weekly and refill with additional product. Adjust the flow of water into the feeder according to the manufacturer's directions to maintain an active bromine level between 1 - 4 ppm as Br₂ in the pool. Use a reliable test kit for the bromine measurement. The pump and filter should be operated at least eight hours every day regardless of use. Outdoor pools may require longer filtering and consume higher amounts of this product.

Superoxidation: Water soluble, non-filterable wastes can accumulate in spa, hot tub and pool water causing dull or cloudy water and stimulating algae growth. Superoxidation or superchlorination with a suitable oxidizing shock treatment should be done on a regular basis to remove these wastes and maintain clear sparkling water. A suitable oxidizing agent is: **[ONE OR MORE OF THE FOLLOWING WILL APPEAR ON THE LABEL.]**

- ◆ Calcium hypochlorite *[alternatively a trade name may be substituted.]*
- ◆ Lithium hypochlorite *[alternatively a trade name may be substituted.]*
- ◆ Sodium dichloroisocyanurate *[alternatively a trade name may be substituted.]*
- ◆ Sodium hypochlorite *[alternatively a trade name may be substituted.]*
- ◆ Potassium peroxymonopersulfate *[alternatively a trade name may be substituted.]*

When using other products as outlined in directions for this product, always follow directions on those products.

Do not directly mix this product in concentrated form with any other chemicals. Do not add other chemicals in the feeder when using this product. A violent reaction leading to fire and/or explosion could result.

Treatment levels of this product can best be measured with test kits for either bromine or chlorine. Tests should be conducted immediately after drawing samples from the pool. Use test kits according to directions.

1. When a bromine test kit is used, results can be read directly as ppm bromine
2. When a chlorine test kit is used, results can be expressed in terms of bromine by multiplying chlorine values by the conversion factor 2.25.

After application, ensure that the bromine level is below 7.5 ppm before reentering the spa, hot tub or pool.

To determine pool capacity: Rectangular Pools - Length times width times average depth (in feet) times 7.5 equals gallons. Round and Oval Pools - long diameter times short diameter times average depth (in feet) times 5.9 equals gallons.

Do not broadcast into pool.

DECORATIVE WATERS

When used as directed, this product effectively controls algal, bacterial, and fungal slime in lakes, ponds, ornamental ponds and fountains that do not contain fish or other aquatic fauna. To control microbial growth add a sufficient amount of this product to achieve and maintain a bromine residual 0.5 - 5 ppm or as needed to obtain control of the system. Using a dispensing device, adjust the device feed rate to assure a constant treatment level between 0.5 and 5 ppm residual bromine. Regular use of a test kit is necessary to maintain an appropriate bromine residual in the system.

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DISINFECTING SALON FOOT SPAS

To start up a new spa or one recently drained, clean all surfaces with a suitable cleaning compound. Fill the spa with water. Adjust the pH to 7.2 to 7.8 prior to initiating treatment with this product *[or use brand name]*. Add a 2-gram scoop of product to 5 to 8 gallons of foot spa water to achieve a 4-ppm bromine level. After each use empty and clean spa surfaces.

{Alternate use directions for above paragraph:}

To start up a new spa or one recently drained, clean all surfaces with a suitable cleaning compound. Fill the spa with water. Adjust the pH to 7.2 to 7.8 with *[product name]* prior to initiating treatment with this product *[or use brand name]*. Add a 2-gram scoop of this product to 5 to 8 gallons of foot spa water to achieve a 4-ppm bromine level. After each use, empty and clean spa surfaces.

{Alternate use directions if using a tear-open packet}

To start up a new spa or one recently drained, clean all surfaces with a suitable cleaning compound. Fill the spa with water. Adjust the pH to 7.2 to 7.8 prior to initiating treatment with this product *[or use brand name]*. Add contents of *[brand name]* packet to the foot spa water (5 to 8 gallons) to achieve a 4-ppm bromine level. After each use, empty and clean spa surfaces.

{Alternate directions if using a feeder rather than directly adding the product to spa water:}

Foot Spa Feeder Instructions:

To start up a new spa or one recently drained, clean all surfaces with a suitable cleaning compound. Fill the spa with water. Adjust the pH to 7.2 to 7.8 prior to initiating treatment with this product *[or use brand name]*. Place this product in a suitable feeder. Adjust the feeder according to the manufacturer's directions to maintain an active bromine level of 4-ppm. Regularly check the feeder and add additional product as needed. After each use, empty and clean spa surfaces.

{Alternate feeder directions to above paragraph.}

To start up a new spa or one recently drained, clean all surfaces with a suitable cleaning compound. Fill the spa with water. Adjust the pH to 7.2 to 7.8 with *[product name]* prior to initiating treatment with this product *[or use brand name]*. Place this product in a suitable feeder. Adjust the feeder according to the manufacturer's directions to maintain an active bromine level of 4-ppm. Regularly check the feeder and add additional product as needed. After each use, empty and clean spa surfaces.

Note: Buyer assumes all responsibility for safety and use not in accordance with directions.

ALBROM 100PC Disinfectant label

Tear-Open Packet label (front)

<p>ALBROM 100PC Disinfectant</p> <p>EPA Reg. No. 3377-61</p> <p>EPA Est. _____</p>
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Tear-Open Packet label (back)

<p>Active Ingredient</p> <p>1,3-dibromo-5,5-dimethylhydantoin..... 99.4%</p> <p>Other Ingredients 0.6%</p> <p>Total 100.0%</p> <p>Available bromine: 111%</p> <p>KEEP OUT OF REACH OF CHILDREN</p> <p>DANGER</p> <p>See container for precautionary statement, first aid, and directions.</p>

ALBROM 100PC Disinfectant labe.

STORAGE AND DISPOSAL

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

STORAGE: Keep this product dry in original tightly closed container when not in use. Store in a cool (<120°F), dry, well-ventilated area away from heat or open flame.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, or if decomposition occurs, isolate container and flood area with large amounts of water to dissolve all material before discarding this container.

CONTAINER DISPOSAL *[commercial]*

[bag or super sack] Offer for recycling, if available. Completely empty bag/super sack. If possible, shake bag/super sack to remove as much residue as possible. Dispose of empty bag/super sack in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[50 pound pail] Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Offer for recycling, if available. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into pool or spa. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Batch Number: _____

CONTAINER DISPOSAL *[residential/household]*

[tear open 1 – 2 pound pouches] Do not reuse bag. Discard in trash.

[disposable feeding device with product inside] Do not reuse empty dispenser. Discard in trash.

[small plastic jugs, plastic pails 50 lb and less] Nonrefillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling, if available.

[box containing tear-open packets] Dispose of empty packets in trash. Discard box when empty.

ALBROM 100PC DISINFECTANT
EPA Reg. No., 3377-61

Optional marketing statements

The following statements may or may not appear on the label, or may appear in combination

For Use with Vinyl Lined Pools
 For Use in All Pools
 For above-ground and in-ground pools
 Ideal for all pool surfaces
 Ideal for all pool and spa surfaces
 Ideal for all pool, spa and hot tub surfaces
 Ideal for all spa and hot tub surfaces
 Ideal for above-ground pools
 Ideal for vinyl pool surfaces
 Safe for all pool surfaces
 Safe for all spa surfaces
 Safe for all pool and spa surfaces
 Safe for all pool, spa and hot tub surfaces
 Safe for all spa and hot tub surfaces
 For all pool surfaces
 For Spas & Hot tubs

For use in all pool types (This statement alerts consumer to the fact they may use this product in above ground, in ground, indoor, outdoor, plaster, vinyl, and fiberglass pools)

Easy to use
 Easy and convenient
 Convenient to use
 Easy, single-step bromine disinfectant

Non-foaming
 Non-staining
 No heavy metals

Oxidizes and clarifies for beautiful water
 Oxidizes and clarifies for clean, clear water
 Clarifies
 For routine disinfection and clarification
 Keeps water clear
 Provides Crystal Clear Water
 For Clear, Clean Water
 No more algae stains
 Sparkling, clear water
 Restores water sparkle
 Clear, clean water
 Disinfects, clarifies, and protects

For application in feeders and floaters

Suitable for use with alternative devices such as ionizers, electrolysis and mineral feeders

Disinfectant and Algistat
 Disinfectant and algaecide
 Bromine technology
 Single step
 One step disinfecting system

Patented
 Patents pending

For commercial use

Slow dissolving nuggets

100% chlorine-free
 Chlorine-free
 Contains no chlorine
 No chlorine odor
 No chlorine smell
 No chloramines

Low odor

Kills E. coli and Enterococcus faecium
 Kills E. coli
 Kills Enterococcus faecium
 Kills bacteria such as E. coli and Enterococcus faecium

Step 1: Add [brand name Scale Control]
 Step 2: Add [brand name Oxidizer]
 Step 3: Add [brand name Disinfectant/Sanitizer]

Customer Helpline toll-free number
 Toll Free
 Call 7 days a week with your questions concerning pool water care. 8:00 am – 10:00 pm Eastern Time
 Call 7 days a week with your questions concerning spa/hot tub water care. 8:00 am – 10:00 pm Eastern Time

Bromine disinfectant
Bromine disinfectant and clarifier

