

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

MAY - 8 2012

Joanna Holcombe Lonza Inc. 90 Boroline Road Allendale, NJ 07401

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Subject:

Dantobrom TM S

EPA Registration No.: 6836-116 Notification Date: 04/26/2012 EPA Receipt Date: 04/30/2012

Dear Ms. Holcombe,

This letter acknowledges receipt of your notification submitted under the provision of FIFRA section 3(c)9 and PR Notice 98-10.

Proposed Notification

Addition of optional signal word "Peligro," marketing/sticker language and brackets

General Comments

Based on a review of the submitted materials, your notification for additional storage and disposal language is acceptable.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at carl.jaclyn@epa.gov. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Jacqueline Campbell-McFarlane

Product Manager (34)

Regulatory Management Branch II Antimicrobials Division (7510P)

EDA	(Jn	ited States		Reg	tion	OPP Identifier Number	
EPA	Environmental	l Protection Ager	ncv	☐ Amenda			
		gton, DC 20460		⊠ Other			
		Application	on for Pest	icide - Section			
Company/Product Numbe	r			luct Manager		3. Proposed Classification	
6836-116			Monisha Harris				
4. Company/Product (Name)			PM# 32			None Restricted	
Dantobrom S 5. Name and Address of Applicant (Include ZIP Code)		de)	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is s			Section 3(c)(3)(b)(I) my product is similar	
Lonza Inc.			or identical in composition and labeling to:				
90 Boroline Road							
Allendale, NJ 07401			EPA Reg. No. Product Name				
			rioduct N	Name			
Check if this is a new add	ress		G .:				
			Section				
Amendment - Explain b						Agency letter dated	
Resubmission in respon		dated		"Me Too" Appli			
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	nonrefillable st	torage and dispo	sal langua	ge, etc. See co	ver letter for	details.	
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Lonza

Via FedEx

Ms. Monisha Harris, PM-32
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2227 S. Crystal Drive
Arlington, VA 22202

Lonza Inc Allendale 90 Boroline Road Allendale, NJ 07401, USA

Joanna Holcombe Lonza Microbial Control Commercial Regulatory Services

Tel 678-627-2336 joanna.holcombe@lonza.com

April 26, 2012

SUBJECT:

Dantobrom S, EPA Reg. No. 6836-116

Application for Label Notification

Dear Ms. Harris:

I am submitting an application to make the following changes to the Dantobrom S, EPA Reg. No. 6836-116, product label:

All Pages:

Add footnote indicating use of brackets for optional language and braces for

informational statements.

Pages 1 & 3: Made some of the marketing language optional. All language to be considered

optional has been enclosed in brackets, which have been highlighted.

Page 1:

Added an optional signal word in Spanish.

Pages 4 & 5: Bromine reentry statement change

We believe that the condition that EPA requested in the 8/18/09 comments letter for 6836-116 (letter attached) was incorrect. The Statement "Re-entry into treated pools is prohibited above levels of 4 ppm due to risk of bodily injury" was required by EPA. We believe that the statement should be "Reentry into treated [pools] [and] [spas] is prohibited above levels of 8 ppm due to risk of bodily injury". Unfortunately, the typo has been carried through one Amendment and one Notification. Another EPA registration, "Bioguard Master BCDMH" (EPA Reg. 5185-420) has the 8 ppm re-entry statement throughout the label (see attached Bioguard label dated Sept. 27, 2011). We believe EPA mixed up the level for chlorine, however, this is a bromine registration. Having a limit of 4 ppm for bromine doesn't make sense from a chemistry perspective. The levels of chemicals are typically measured in ppm (i.e. mg/L) units. Since bromine is ~ twice as heavy as chlorine (bromine molecular weight = 79.9 g/mole, Chlorine = 35.5 g/mole), that means that you are limiting the concentration of bromine atoms to half the level allowed for chlorine. This is unduly restrictive. We believe that this can be corrected by Notification.

....

2/2, April 26, 2012, Dantobrom S, EPA Reg. No. 6836-116

Page 6:

Added note to reviewer and referral statement regarding final labels with both nonrefillable and refillable storage and disposal directions. A sticker will be applied to the container that indicates which kind of container it is, and "See the sticker on the [front] [back] [side] [top] of the container to determine if it is nonrefillable or refillable." will appear above the storage and disposal directions.

Please find the enclosed documents in support of this notification:

- Application for Notification;
- Copy of the "Bioguard Master BCDMH" (EPA Reg. 5185-420) label;
- Certification with Respect to Label Integrity;
- · CD with label; and
- · One copy of the proposed label with changes highlighted.

If you have any questions or need any additional information, please feel free to contact me at 678-627-2336.

Sincerely, Lonza Inc.

Joanna Holcombe

Sr. Commercial Regulatory Services Associate

Joanna Holcombe

DANTOBROM™ S

BROMINATING DISINFECTANT FOR [SPAS][,] [HOT TUBS] [AND] [POOLS]

[Step 2 - Maintain]

N	TIFIC	ATION	de
NK Deta Fil Parken	wiewed	J.C.	t

Active Ingredients:	
1-bromo-3-chloro-5,5-dimethylhydantoin	54.29
1,3-dichloro-5,5-dimethylhydantoin	
1,3-dichloro-5-ethyl-5-methylhydantoin	
Other Ingredients:	
Total:	100.09
Total Available Halogen as Bromine: 141%	

[and/or]

Total Available Halogen as Chlorine: 62.8%

KEEP OUT OF REACH OF CHILDREN

[PELIGRO] DANGER

See [side] [back] [right] [left] panel for additional Precautionary Statements and First Aid

EPA Reg. No. 6836-116 EPA Est. No. 6836-PA-01 Net Weight: (as indicated on the container)

[DOT Symbols] [Country of origin (insert country)] [Manufactured in (insert country)] [Barcode]

Lonza Inc. 90 Boroline Road Allendale, NJ 07401

Emergency Contact Number: (_

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: HIGHLY CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if swallowed. Do not take internally. Irritating to nose and throat. Avoid breathing dust. Use with adequate ventilation. Do not get into eyes, on skin or on clothing. Wear protective clothing, chemical resistant gloves and protective eyewear (goggles, face shield or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

FIRST AID

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

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.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes.

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 the 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 by mouth-to-mouth, if possible.

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

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish.

{Note to reviewer: If container size is 50 lbs. or larger, the following statements will also be used:}

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 AND CHEMICAL HAZARDS

CHEMICAL HAZARD. STRONG OXIDIZING AGENT. 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 matter, 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 re-seal container. If possible, isolate container in open air or well-ventilated area. Flood with large volumes of water if necessary.

{Note to reviewer: The following is considered optional marketing language:}

- Tablet shape fits all floaters
- o High level of active halogen (bromine)
- o Improved bather comfort
- No bleaching of hair or bathing suits
- o Doesn't reduce pH or affect hardness
- o [Very] low odor
- Low dust tablets
- o Ideal for [spa] [/] [hot tub] sanitizing
- Works with inline of floating feeders
- o Ideally suited for floater type feeders
- o Fits all floaters

hth spa product guide Maintain

Step 1

Step 2

Enhance Prevent



DANTOBROM S is a form of brominating hydantoin for [spas][,] [hot tubs] [and] [pools]. It is easily adapted to many erosion feeders used to automatically treat both commercial and residential [spas][,] [hot tubs] [and] [pools].

When used as directed, **DANTOBROM S** will disinfect [spa][,] [hot tub] [and] [pool] water, keeping it clean, clear and free of odor. **DANTOBROM S** gives the effectiveness of chlorine without the chlorine odor. Proper sanitary practices require [changing spa water at a minimum of every 30 days] [and] [properly monitoring pool water conditions.]

DIRECTIONS FOR USE

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

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

Re-entry into treated [pools] [and] [spas] is prohibited above levels of 8 ppm due to risk of bodily injury.

SPA DIRECTIONS

NOTE: Before using **DANTOBROM S** in your spa or hot tub for the first time, add ½ ounce of sodium bromide per 100 gallons of water to establish a 30 ppm bromide concentration. Also, add sodium bromide at this dosage whenever the spa or hot tub is drained and refilled. The bromide addition ensures immediate establishment of an all-bromide system, eliminates chlorinous odors and maximizes skin and eye comfort.

SPA OR HOT TUB START UP:

To start up a new spa or hot tub, or one recently drained, clean all surfaces, backflush or clean the filter, chemically balance the calcium hardness and total alkalinity, treat for metals if present (iron, copper and manganese), and adjust the pH to 7.2 - 7.8.

Using a suitable feeder adjusted according to the manufacturer's directions, add **DANTOBROM S** to maintain an active bromine concentration of 2 to 4 ppm in residential spas and 3 to 6 ppm in commercial spas. Use a reliable test kit to monitor for bromine regularly.

DANTOBROM S usage will typically vary from 0.015 to 0.10 pound for every 300 gallons of spa water to maintain the recommended bromine concentration range.

The presence of organic debris, high bather use and other factors may require a higher dosage.

SUPEROXIDATION:

Water soluble, non-filterable wastes can accumulate in spa or hot tub water and cause dull or cloudy water and can stimulate algal 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. Suitable oxidizing agents are those based on calcium hypochlorite, lithium hypochlorite, sodium hypochlorite or potassium peroxymonopersulfate.



POOL DIRECTIONS TO START UP A NEW POOL, OPEN A POOL FOR THE SEASON OR CONVERT FROM A CHLORINE BASED PROGRAM:

Backflush or clean the filter, chemically balance the calcium hardness and alkalinity and adjust pH to 7.2 to 7.8. Superoxidate to obtain a residual of 10 to 20 ppm available bromine [5 to 10 ppm available chlorine] as determined by a suitable test kit. Swimming may begin when the bromine level drops below 8 ppm.

When the bromine level drops below 1 to 3 ppm, add 0.2 to 2.0 ounces of **DANTOBROM S** per 1000 gallons daily, or as needed. Use a suitable feeder device adjusted according to the manufacturer's instructions so as to maintain 1 to 3 ppm available bromine. Use a reliable test kit to monitor for bromine regularly. Maintain the pool water pH between 7.2 and 7.8.

High temperatures, the presence of organic debris, high bather use and other factors may require more frequent treatments.

SUPEROXIDATION:

Water soluble, non-filterable wastes can accumulate in pool water and cause dull or cloudy water and can stimulate algal growth. Superoxidation or superchlorination with a suitable oxidizing shock treatment should be done weekly or bi-weekly, after extremely heavy bather loads or heavy rain storms. Suitable oxidizing agents are those based on calcium hypochlorite, lithium hypochlorite, sodium hypochlorite or potassium peroxymonopersulfate.

{Note to reviewer: For Nonrefillable Containers, Household/Residential Uses; Product is non-dilutable solid} STORAGE AND DISPOSAL

Store in original container in areas inaccessible to children in a cool, dry, well-ventilated area. Do not store at temperatures above 100°F. Nonrefillable container. Do not reuse or refill this container. Discard empty container in trash or offer for recycling if available.

{Note to Reviewer/Subregistrant: If both nonrefillable and refillable container storage and disposal directions appear on the final label, a sticker must be added to the container stating if it is a nonrefillable or refillable container. Also, the following statement must be included directly above the storage and disposal directions on the final label;}

See the sticker on the [front] [back] [side] [top] of the container to determine if it is nonrefillable or refillable.

{Note to reviewer: For Nonrefillable Containers, Commercial/Industrial/Institutional Uses, Product is non-dilutable solid}

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep container tightly closed. Store in a cool, dry, well-ventilated place. Do not store in direct sunlight. Do not store at temperatures above 100°F.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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 the label instructions contact your State pesticide or environmental control agent or the hazardous waste representative at the nearest EPA regional office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container.

{Metal and plastic containers:} Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate or burn if allowed by State and local authorities. If burned, stay out of smoke. If not tripled rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state, and federal regulations.

{Metal containers only:} DO NOT cut or weld metal containers.

(Fiber drums and liners:) Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Offer for recycling, if available or dispose of liner and drum in a sanitary landfill or incinerate if allowed by State and local authorities.

{Bulk Bag/Super Sack Container:} Completely empty bag into application equipment by shaking and tapping sides and bottom to loosen clinging particles. If not emptied in this manner, the bag may be considered an acute hazardous waste and must be disposed in accordance with local, state and federal regulations. When completely empty, offer for recycling if available or dispose of bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

{Tote Container:} Empty tote container must be returned to a tote collection agent.

{Note to reviewer: For Refillable Containers, Commercial/Industrial/Institutional Uses, Product is non-dilutable solid}

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Refillable container. Refill this container with (*this product*) only. Do not reuse this container for any other purpose. Cleaning before refilling is the responsibility of the refiller.

(Metal and plastic containers:) Attach tamper evident devices [seals] to all openings, except vents, and return to the manufacturer for refilling.

{Tote Containers:} Empty tote container must be returned to a tote collection agent.

{Plastic drums and liners:} Attach tamper evident devices [seals] to all drum openings, except vents, and return the drum to the manufacturer for refilling.

PESTICIDE STORAGE: Keep container tightly closed. Store in a cool, dry, well-ventilated place. Do not store in direct sunlight. Do not store at temperatures above 100°F.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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 the label instructions contact your State pesticide or environmental control agent or the hazardous waste representative at the nearest EPA regional office for guidance.

FINAL CONTAINER DISPOSAL: Cleaning the container before final disposal is the responsibility of the person disposing of the container.

{Metal and plastic containers:} To clean the container before final disposal empty remaining contents from container for use according to use directions and triple rinse promptly after emptying. Triple rinse (or equivalent). **{Tote Containers:}** To clean the container before final disposal empty remaining contents from container for use according to use directions and triple rinse promptly after emptying. Triple rinse (or equivalent). For additional container disposal information, contact product supplier.

(Plastic drums and liners:) Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Offer for recycling, if available or dispose of liner in a sanitary landfill or incinerate if allowed by State and local authorities.

Dantobrom S EPA Reg. No. 6836-116 Draft Label 2012-04-26

Note to reviewer:
[Items in brackets [AAA] are optional and may/may not be included on final label]
{Items in braces {AAA} are for information purposes and will not appear on final label}
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