

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OCT 23 2003

Robert J. Sloan
Lonza, Inc.
17 - 17 Route 208
Fair Lawn, N.J. 07410

SUBJECT: August 18, 2003 Application Amendment
Bioguard Bromo Brix Pool Brominating Briquettes
EPA Registration 6836-197

Dear Mr. Sloan:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following conditions. Move the word DANGER to the beginning of the paragraph under Precautionary Statements. You must increase the type size of the FIRST AID heading. Under Directions for Use change the pH range to 7.2 to 7.6 in accordance with the Hypochlorite Standard. In summary, your request to revise the First Aid, Storage and Disposal statement is acceptable.

A copy of your conditionally approved stamped label is enclosed. Please submit a copy of your revised finished label for our files. If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Tom Luminello".

Robert S. Brennis
Product Manager (32)
Regulatory Management Branch II
Antimicrobial Division (7510-C)

Enclosure

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

move to beginning of sentence

HARMFUL IF SWALLOWED. HIGHLY CORROSIVE. DO NOT TAKE INTERNALLY. Causes eye and skin damage. Irritating to nose and throat. Avoid breathing dust. Use with adequate ventilation. Do not get into eyes, on skin or clothing. Wear rubber gloves and goggles or face shield when handling. Wash thoroughly after handling. Immediately remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. 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 state 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.

**KEEP CONTAINER TIGHTLY CLOSED
STORE IN A COOL DRY PLACE
DO NOT STORE AT ELEVATED TEMPERATURES**

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

OCT 23 2003

6836-197

BIOGUARD®

2/3

BROMO BRIX®

POOL

BROMINATING BRIQUETTES

ACTIVE INGREDIENTS:

1-bromo-3-chloro-5,5-dimethylhydantoin.....	60.0%
1,3-dichloro-5,5-dimethylhydantoin.....	27.4%
1,3-dichloro-5-ethyl-5-methylhydantoin.....	10.6%
OTHER INGREDIENTS.....	2.0%
TOTAL.....	100.0%

Available bromine.....	39.2%
Available chlorine.....	44.4%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

make bigger

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.

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.

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

(See First Aid and additional precautions on back panel.)

EPA Reg. No. 6836-197
EPA Establishment No.
NET WEIGHT: _____ lbs (Kg.)
(Each Briquette weighs approximately _____ (ozs.))

Manufactured Under U.S. Patent # _____

Manufactured by:
Lonza, Inc., 17-17 Route 298, Fair Lawn, NJ, 07410

BioGuard® Bromo Brix® Pool Brominating Briquettes contain a unique, patented, organic brominating compound to effectively disinfect pool water, keeping it clean, clear and odor free. Bromo Brix, with ethylmethylhydantoin (EMH), are faster dissolving and faster acting than the older, halogenated dimethylhydantoin. The quicker, cleaner dissolving EMH formula means easier and more trouble free automatic pool disinfection.

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.

IMPORTANT: Before using this product for the first time, at the beginning of each season or when substantial water has been drained from the pool, broadcast Pool Prep® Bromide Pretreat (3 pounds per 10,000 gallons) into the deep end of the pool with the circulation on. This gives a bromide reserve of 30 ppm which converts chlorine in the water to active bromine. The result is comfortable, odorless, chlorine-free water.

Pool Start Up:

Prior to initial filling, refilling, opening the pool for the season or converting to Bromo Brix from a chlorine based system, clean the pool and filter thoroughly and assure that the recirculation system is operating properly. Chemically balanced water ensures maximum chemical product performance and easier, more problem free overall pool maintenance.

Adjust and maintain pH between 7.2-7.6 7.4-7.6 Balance total alkalinity, calcium hardness and treat the pool water for heavy metals such as iron, copper, or manganese, if present, prior to initiating this system.

Add Pool Prep Bromide Pretreat as described above. Then superoxidate the water with Oxy Brom® non-chlorine shock treatment. Swimming may begin when the available bromine reading is in the range 1 - 6 ppm. Begin the Bromo Brix feed to maintain the available bromine between 1 and 3 ppm. Use a reliable bromine test kit.

To convert ppm active bromine to ppm available chlorine, divide the ppm bromine by 2.25.

Feeding Requirements:

Apply this product through an automatic feeding device. Follow the manufacturer's instructions to maintain the desired 1-3 ppm bromine level, using a reliable test kit. The average daily use of this product is 30-180 grams (3-15 briquettes) per 10,000 gallons per day, depending on use and weather conditions.

Super-oxidation:

Swimmers using the pool contribute water soluble, non-filterable wastes such as perspiration, oils, body creams, mucous discharges, urine, saliva, etc. If allowed to accumulate, these can cause the water to become dull and unattractive and stimulate algal growth. Periodic oxidation of the water with Oxy Brom®, or another suitable oxidizing shock treatment, removes these wastes and maintains comfortable sparkling water.

The shock treatment should minimally provide an oxidizing equivalent to 8 ppm available chlorine.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Do not store on side. Avoid creasing or impacting of side walls. Store in a well ventilated area away from heat or open flame. In case of decomposition, isolate container, if possible, and flood with large amounts of water to dissolve all material before discarding.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray or mixture of 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.

CONTAINER DISPOSAL

(Plastic containers): 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 way of smoke.
(Metal Containers:) Triple rinse (or equivalent), then offer for recycling or reconditioning, or dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.
(Fiber drums and liners): Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Then dispose of liner and drum in a sanitary landfill or incinerate if allowed by State and local authorities. Do not reuse empty drum or liner.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

OCT 23 2003

of the Federal Insecticide,
Fungicide, and Rodenticide Act
enacted, for the pesticide,
Registered under EPA Reg. No.

6836-197

