

7/22/2004



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUL 22 2004

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

SUBJECT: May 20, 2004 Amendment
Kem Tek Spa Kem Bromi-Buoy
EPA Registration 6836-243

Dear Mr Sloan:

The amendment referred to above, submitted in connection with registration of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable with the following conditions:

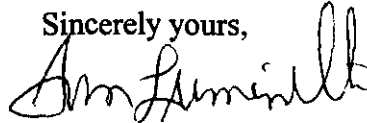
1. Add the words KEM TEK to the top line above your products brand name.
2. Change the EPA Registration Number from 6836-143 to 6836-243.
3. On page 3, change the sentence circled to read "**Follow other product's label instructions**" and place it bold type.
4. Fix typos as marked.
5. Since your product is a category Toxicity I eye irritant and is not limited to residential use revise Storage and Disposal instructions to:

STORAGE: Do not contaminate water, food, or feed by storage or disposal. Store this product in a cool dry area away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Do not reuse empty container, but place in trash collection. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

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 label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

In summary, you have revised the Precautionary Statements and the First Aid Statement. A stamped copy of the label is enclosed for your records. Please revise your label and submit 2 copies of finished labeling for our files. If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,



Emily H. Mitchell
Acting Product Manager 32
Regulatory Management Branch II
Antimicrobial Division (7510-C)

Enclosure

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KEM TEK SPA KEM BROMI-BUOY™

FLOATING BROMINATOR

Heat Stabilized - Long Lasting
For Spa Disinfection and algae prevention
Adjustable
Easy-to-use

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

See side / back / right / left panel for Precautionary Statements and First Aid

EPA Reg. No.
EPA Est. No.
Net Weight:

6836-~~143~~ 243
7616-CA-01
0.5 lb.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JUL 22 2004

LONZA INC.
17-17 Route 208
Fair Lawn, NJ
07410

Emergency Contact Number: (_____)

6836-243

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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. 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. Do not contaminate water by cleaning of container or equipment or disposal of wastes.

PHYSICAL AND CHEMICAL HAZARDS

CHEMICAL HAZARD. STRONG OXIDIZING AGENT. Mix only with water. Use clean, dry utensils and equipment. 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 and explosion. Contamination with moisture, organic matter or other chemicals may start a chemical reaction with generation of heat, hazardous gases and possible fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well ventilated area. If necessary, flood with large volumes of water.

DIRECTIONS FOR USE

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

Bromine tablets are an effective sanitizer and disinfectant of spa and hot tub water. When adjusted to maintain a residual of 2 – 4 ppm bromine in residential spas, these concentrated slow-dissolving tablets will keep the water clean and free of odors. Testing for residual must be performed using a reliable test it available at Kem Tek retailers.

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6826-742

SPA START-UP

Fill Spa or Hot Tub with fresh water. If stain causing metals such as iron or copper are known to be present, treat with a suitable product such as Kem Tek's Spa Kem Stain and Scale Inhibitor. Test for total alkalinity and adjust as needed. Test pH and adjust to 7.2 – 7.6 as needed. Use a product such as Kem Tek's pH Minus to lower pH, or pH Plus to raise pH. Shock or superchlorinate water using a fast acting chlorinating product such as Kem Tek's Spa Kem Chlorinating Granules or Liquid Shock, using an amount sufficient to produce 5 ppm chlorine (or 10 ppm bromine) residual. Follow product's instructions, for proper dosage. Operate circulating/filtration system for at least 3 hours daily to maintain clean and clear water. Do not heat water above 104° F.

other label

**PREPARATION, USE AND REFILLING OF THE BROMI-BUOY™
(BROMINE FEEDER)**

1. To use this floating bromine feeder, cut off the two opposing knobs nearest the cap. Locate and cut off the knob that corresponds to the spa capacity in gallons. Hold the Bromi-Buoy, neck down, and shake to level contents. Place into spa. *typo*
2. Monitor bromine residual using a reliable test kit. Bromine residual should read 2 – 4 ppm. If necessary, increase residual by cutting off the knob for the next higher spa capacity.
3. The Bromi-Buoy tilts when empty. Drain all the water and remove safety cap to refill. Use only Kem Tek Spa Kem Brominating Tablets. **NEVER MIX WITH ANY OTHER CHEMICALS OR TABLETS.** Fill only lower portion of the Bromi-Buoy; do not fill into neck (DO NOT OVERFILL). When feeder shows signs of brittleness or cracking it must be replaced.

ROUTINE MAINTENANCE

Because use, exposure to sunlight and depletion of feeders can cause bromine residual to drop below the recommended 2 – 4 ppm, the water needs to be periodically shocked or superchlorinated. This must be done at least weekly or after each use to prevent growth from occurring which can cause excess chemical consumption (or persistently low bromine readings), as well as unsightly or cloudy water which is unsuitable for bather use. See Instructions under "Spa Start-up". Residential spas must be drained and refilled with fresh water every 60 days or more frequently depending on use. *typo*

STORAGE AND DISPOSAL

Store in original container. Do not reuse empty container. Wrap empty container and discard in trash or recycle.

} change per cover letter

**DO NOT STORE AT TEMPERATURES ABOVE 100°F.
KEEP CONTAINER TIGHTLY CLOSED.
STORE IN A COOL, DRY, WELL-VENTILATED PLACE.**