

OCT 14 1997

Ms. Kari E. Mavian, for Lonza Inc.
Lewis & Harrison
122 C Street, N.W., Suite 740
Washington, D.C. 20001

SUBJECT: Dantobrom S Granular
EPA REG. No.: 6836-251
RE: Your Label Amendment dated September 16, 1997.

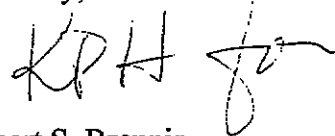
Dear Ms. Mavian:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comment listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

1. Change the label by revising the EPA Registration Number to read, "EPA Reg. No. 6836-251."

A stamped copy of the draft label is enclosed for your records.

Sincerely,



Robert S. Brennis,
Acting PM 32
Regulatory Management Branch II

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

DANGER Highly corrosive. May be fatal if swallowed. **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 into lakes, streams, ponds, estuaries, oceans or other public water 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 plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS

CHEMICAL HAZARD: STRONG OXIDIZING AGENT. Keep away from heat or flame. 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.

Dantobrom S Granular is a new form of brominating hydanoln for spas and hot tubs. It is easily adapted to many erosion feeders used to automatically treat both commercial and residential spas and hot tubs.

When used as directed, Dantobrom S Granular will disinfect spa and tub water, keeping it clean, clear and free of odor. Dantobrom S Granular gives the effectiveness of chlorine without the chlorine odor.

Proper sanitary practices require changing spa water at a minimum of every 30 days.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
OCT 14 1997

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

0836-251

DANTOBROM S GRANULAR
BROMINATING DISINFECTANT FOR SPAS AND HOT TUBS

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%
Inert Ingredients	2.0%
Total	100.0%

Available bromine	39.2%
Active Chlorine	44.4%

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

If In Eyes: Flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart to ensure rinsing of the entire surface of the eye and lids with water. If physician is not available, flush for additional 15 minutes. Get immediate medical attention.

If on Skin: Immediately wipe away excess material with a dry cloth while removing contaminated clothing and shoes. Under a safety shower, wash affected areas thoroughly with large amounts of water, and soap if available, for at least 15 minutes. Get immediate medical attention. Discard or decontaminate clothing and shoes.

If Inhaled: Remove from area to fresh air. If not breathing, clear airway and start mouth-to-mouth artificial respiration or use a bag mask respirator. Get immediate medical attention. If victim is having trouble breathing, transport to medical care and, if available, give supplemental oxygen.

If Swallowed: Immediately give several glasses of water. **DO NOT** induce vomiting. If vomiting occurs, give fluids again. Have physician determine if patient's condition allows induction of vomiting or evacuation of stomach. Do not give anything by mouth to an unconscious or convulsing person. Get immediate medical attention.

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

EPA Registration No.
EPA Establishment No.
Net Weight

6836-
6836-PA-01
(as marked on container)

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

DIRECTIONS FOR USE

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

Spa or Hot Tub Startup: Clean all surfaces and the filter, balance the hardness and alkalinity, treat if metals are present, and adjust the pH to 7.2 to 7.8. **NOTE:** Before using Dantobrom S Granular in your spa or hot tub for the first time, add 4.6 fl. oz. of a 32% sodium bromide solution (or 0.09 lbs. [1 1/2 oz.] of solid sodium bromide) for every 300 gallons of water to establish a 30 ppm bromide concentration. Please refer to the use directions for Lonza NaBr solution. Add sodium bromide at this dosage whenever the spa or hot tub is drained and refilled. Bromide addition ensures immediate establishment of an all bromide system, maximizing skin and eye comfort. Using a suitable feeder adjusted according to the manufacturer's directions, add Dantobrom S Granular to maintain a 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 Granular usage will typically vary from 0.015 to 0.1 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 the water causing dull or cloudy water, enhancing microbiological growth. Superoxidation or superchlorination with a suitable oxidizing shock treatment should be performed on a regular basis to remove these materials and maintain clear, sparkling water. Suitable oxidizing shock agents include those based upon calcium, lithium or sodium hypochlorite and potassium peroxymonosulfate.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Keep container tightly closed. Store in a cool, dry, well-ventilated area. Do not store at elevated temperatures.

Pesticide Disposal
Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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.

Container Disposal
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.
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.

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