Reg # 71.24 - 104

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

10 FEB 1995

PM-3=

Alden Leeds, Inc. 55 Jacobus Ave. So. Kearney, NJ 07032

Attn: Mark Visconti

Subject: Maxibrom Slow Dissolving Brominating Tablets for Swimming Pools Spas & Hot Tubs EPA Registration No. 7124-102, Hydrobrom 3 Oz. Slow Dissolving Brominating Tablets EPA Registration No. 7124-104 Your Submissions of August 2, 1994

The submissions noted above involving the addition of supplementary precautionary language to the subject product labels has been reviewed and the following comments apply.

- 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 comments listed below. A stamped copy is enclosed for your records. Five copies of the finished labeling which incorporate these comments must be submitted before releasing the product for shipment.

1. Revise the first part of the "Practical Treatment" section to read as follows: "Statement of Practical Treatment (First Aid): If Swallowed: Drink large quantities of water. Avoid alcohol. Do not induce vomiting. Get prompt medical attention. (For small children, give one oz. of water per pound of child).".

2. Revise the first sentence of the "Environmental Hazards" statement to "This product is toxic to fish and aquatic organisms.".

3. In the supplemental Precautionary Statements:

a. Revise the statement "Do not take advice from others."to read: "Do not take advice from others concerning the use of this product.".

CONCURRENCES								
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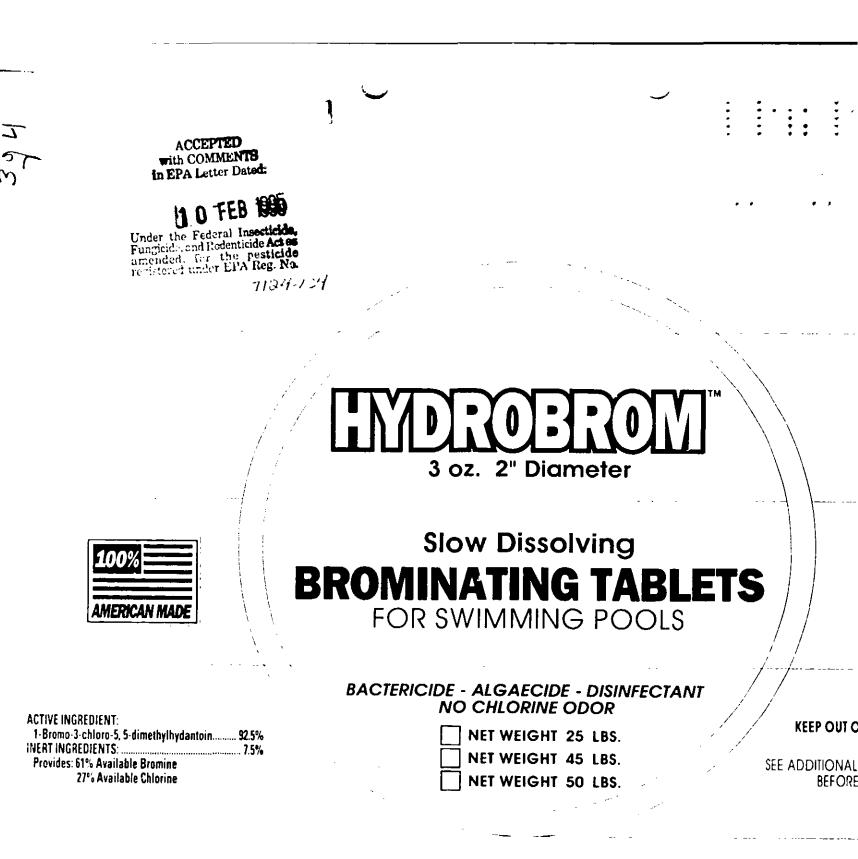
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b. Delete the statement "Do not experiment", or, you may qualify the statement with additional language such as "Do not experiment with this product beyond the use directions given on the product label for risk of potential serious harm.".

If you should have any questions concerning this letter, you may call Robert Travaglini on (703) 305-6909.

Sincerely,

Ruth G. Douglas Product Manager (32) Antimicrobial Program Branch Registration Division (7505C)



HYDROBROM[™] Slow Dissolving - 3 ounce - 2" Diameter BROMINATING TABLETS FOR SWIMMING POOLS

BACTERICIDE - ALGAECIDE - DISINFECTANT - NO CHLORINE ODOR

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive Causes eye and skin damage. Harmful or fatal if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Irritating to nose and throat. Avoid breathing dust Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling.

PRACTICAL TREATMENT: If swallowed: Seek medical attention promotly. Do not induce vomiting. Do not drink alcohol. Drink at least 8 ounces of water (not to exceed 0.23 oz. per pound in a child)

If on skin; Remove contaminated clothing immediately. Brush off excess chemical and wash skin with large volumes of soap and water, flushing the skin with water for at least 15 minutes. If skin irritation develops, seek medical attention.

For eye contact: Irrigate eyes with large volumes of room temperature water for at least 15 minutes, then seek inedical attention promptly.

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

ENVIRONMENTAL HAZARDS: This product 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: Strong oxidizing agent. Mix only with water. Use clean, dry utensits 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.

SPECIAL PRECAUTIONS PLEASE READ BEFORE OPENING CONTAINER PREVENTION OF PHYSICAL INJURY

 This product emits a powerful chlorine/bromine gas. Do not open container indoors Hold away from face when opening to avoid breathing fumes.

2. This product is dangerous when not used properly.

MISUSE MAY RESULT IN SERIOUS PERSONAL INJURY REQUIRING HOSPITALIZATION RELATED COMPLICATIONS MAY LEAD TO DEATH Do not mix with any other chemicals

Mixing with other chemicals may cause a violent and instantaneous chemical reaction Do not add water to this product Do not add this product to water in a pail Do not take advice from others Do not experiment Follow label instructions exactly PREVENTION OF PROPERTY DAMAGE: Contact between this product in its undissolved state and vinvil liners, painted surfaces

or other property in or around the pool will result in permanent bleaching of the color

DIRECTIONS FOR USE FOR SWIMMING POOLS

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. When used as directed, these tablets are effective as a swimming pool water sanitizer and disinfectant. The filtration system should be in proper working order, the pH adjusted between 7.2 and 7.6, the total alkalinity maintained between 100 and 150 ppm, and the calcium hardness maintained between 150 to 300 ppm. A bromine or chlorine residual of 1.0 to 2.0 ppm-must first be established in the pH adjusted pool. If this is accomplished with a granular hypochlorite product, follow use directions on that product is later. If the residual is established with these tablets in a brominator, use the brominator at the highest feed rate following manufacturers is recommendations. When the bromine residual reaches 1.0 to 2.0 ppL, adjust the feeder accordingly. To maintain a bromine residual, adjust the brominator feed rate to assure a constant treatment level 0.1 0.0 3.0 ppm in residential pools and 3.0 to 5.0 ppm and 3.0 to 5.0 ppm and y.3.0 to 180 grams of this product per 10,000 gallons daily). Each tablet weighs about 3.0 to 5.0 ppm and use rates will vary depending on organic load and environmental conditions. The regular use of a good test kit will determine if further adjustments are needed. Do not swim in the water if the bromine residual is above 8 ppm.

FOR SPAS & HOT TUBS

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

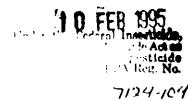
When used as directed, bromine tablets are effective as a spaland hot tub sanitizer and disinfectant. To keep spaland hot tub water sparking clean and odor free, place bromine tablets in a feeder. Use I tablet per 150 gallons, or fraction, of water to be treated. Add new tablets as needed to maintain an active bromine residual between 2 to 4 ppm in residential spas and hot tub ppm in commercial spas. The feeder, filled with bromine tablets, should then be operated as per manufacturer s recommendations. The pump and filter should be operated for at feast three hours every day. To conserve every, ere the heater only when spalor hot tub is to be used. Do not heat water above 104 F. Keep the spalare of leaves and other debris. Backwash or clean the filter often. In heavily used commercial spas or hot tubs, drain and refill with fresh water every 4 days. In commercial spas or hot tubs with average use, drain and refill with fresh water every 8 days. Residential spas and hot tubs should be drained and refilled with fresh water every 60 days. Before refilling, clean the sides with a nen abras ve, low-foaming cleaner and rinse thoroughly each time the spalar of hot tub sider in a diation of heat water every 60 days. Before refilling, clean the sides with a nen abras ve, low-foaming cleaner and rinse thoroughly each time the spalar had had hot tub side a good test with fail below 7.0. Maintain total alkalinity of 100-150 ppm and calcium hardness of 150 to 300 ppm at all times. Use a good test with the store the residuel, pH, total alkalinity, and calcium hardness.

Each tablet weighs about 3 oz. (85 grams)

STORAGE AND DISPOSAL: Keep product dry in tightly closed original container when not in use. Store in a conf, dry, well ventilated area away from heat, open flames, sunlight and other chemicals. Do not reuse empty container. Binse empty container thoroughly with water and discard in trash.

E P A REG NO 1724 104 EPA EST NO 7124-NJ-1

Manufactured by ALDEN LEEDS, INC. 55 Jacobus Ave., So. Kearny, NJ 07032



ACCEPTED

in EPA Letter Dates

with COMMENTS