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Ameribrom, Inc. 52 Vanderbilt Avenue New York, NY 10017

Attn: Ruben Wichy

Subject: Halobrom G

EPA Registration No. 8622-26,

Halobrom T-30

EPA Registration No. 8622-27,

Halogene G

EPA Registration No. 8622-29,

Halogene T-30

EPA Registration No. 8622-30,

Halobrom Mini Slov Dissolving Brominating Tablets

EPA Registration No. 3622-41

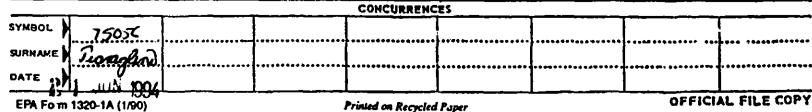
Your Submissions of December 6, 1993 and January 24,

1994

The submissions noted above, an acute oral toxicity study and an acute inhalation study conducted in support of a proposed change to the subject product formulations and forwarded in response to EPA's letter of February 25, 1993, have completed review. The following comments are a result of this review.

Product Chemistry

- 1. The proposed change in the formulation by the addition of boric acid as a binding agent to the <u>basic</u> formulation under this product registration is acceptable.
- 2. The revised Confidential Statement of Formula (CSF) for the basic formulation under this product registration is acceptable.



"11 S. Gramamara Primina Office: 1992 -- 820-858/-0872

Product Toxicology and Labeling

- 1. The submitted acute oral toxicity study submitted in support of this formulation change is accepted as core guideline. The characterization of this product for Acute Oral Toxicity is Category III.
- 2. The submitted acute inhalation study is accepted as core guideline in support of this amendment. The characterization of this product for Acute Inhalation Toxicity is Toxicity Category II.
- 3. The revised product labeling submitted in conjunction with this amendment 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. Submit five copies of the finished printed labeling containing these revisions, before releasing the product for shipment.
 - a. The Precautionary Statements must be revised to read:

"Corrosive: Causes irreversible eye damage and skin burns. Do not get in eyes, on skin or on clothing. Eye contact may cause loss of vision. Irritating to nose and throat. May be fatal if inhaled. Do not breathe dust or spray mist. Harmful if absorbed through skin or swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wear goggles with side shields, face shield or safety glasses; protective clothing and rubber gloves. Wear a mask or pesticide respirator jointly approved by Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.".

- b. Add the phrase "First Aid" parenthetically to the end of the heading Statement of Practical Treatment, as in "Statement of Practical Treatment (First Aid)".
- c. Revise the "If Inhaled" instructions in the Statement of Practical Treatment to read: If inhaled: Remove victim to fresh air. If not breathing give artificial respiration, preferably mouth to mouth. Get medial attention immediately.".

(Please note that changes a & c stem from the results of the acute inhalation study.)

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4. Revise the Environmental Hazards statement to read as per PR Notice 93-10:

"This product is toxic to fish and aquatic organisms. Do not contaminate water by cleaning of equipment or disposal of wastes. 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 top sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.".

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

Sincerely,

(C)

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

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HALOGENE G

BROMO-CHLORO-DIMETHYLHYDANTOIN

with COMMITTEE in EPA Letter Dates

A MICROBIOCIDAL BACTERICIDE, FUNGICIDE,
ALGICIDE AND SLIMICIDE, FOR TREATING INDUSTRIAL
RECIRCULATING COOLING WATER AND ONCE-THROUGH and COOLING WATER SYSTEMS

fader the Foderal Insociation

PG-GGO8

ACTIVE INGREDIENT: 1-Bromo-3-Chloro-5,5-dimethylhydantoin 92.5% INERT INGREDIENTS 7.5% TOTAL 100.0%

DANGER CORROSIVE AND STRONG OXIDIZER

STATEMENT OF PRACTICAL TREATMENT

If swallowed: Drink promptly large quantities of water. Do not induce vomiting. Avoid

alcohol. Call a physician immediately.

If In eyes: Hold eyelids open and flush with a steady, gentle stream of water for at least

15 minutes. Get prompt medical attention.

If on skin: Brush off excess chemical and wash with soap and water for at least 15

minutes. If irritation persists, get medical attention.

If inhaled: Remove person to fresh air immediately. Get medical attention at once.

Note to

Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

USE WITH ADEQUATE VENTILATION
WASH THOROUGHLY AFTER HANDLING

See side panels for additional precautionary statements.

EPA Reg. No. 8622-29

EPA Est. No. 8622-TX-1

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Manufactured by: AMERIBROM, INC.

52 VANDERBILT AVENUE

NEW YORK, NEW YORK 10017

(212) 286-4000

MADE IN ISRAEL

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE

CAUSES IRREVERSIBLE EYE DAMAGE AND SKIN BURNS
EYE CONTACT MAY CAUSE LOSS OF VISION
IRRITATING TO NOSE AND THROAT
MAY BE FATAL IF SWALLOWED

AVOID BREATHING DUST.

DO NOT GET IN EYES, ON SKIN, OR ON CLOTHING.

PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS.

WEAR GOGGLES WITH SIDE-SHIELDS, FACE SHIELD OR SAFETY GLASSES, RUBBER OR PLASTIC GLOVES AND PROTECTIVE CLOTHING WHEN HANDLING.
WASH THOROUGHLY WITH SOAP AND WATER AFTER HANDLING.
REMOVE CONTAMINATED CLOTHING AND WASH BEFORE REUSE.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Apply this product only as specified on this label. Do not contaminate water by cleaning of equipment, or disposal of wastes. NOTE: Do not discharge into lakes, streams, ponds, or public waters unless in accordance with an NPDES permit. For guidance, contact your regional office of the EPA.

CHEMICAL AND PHYSICAL HAZARDS

Strong oxidizer, mix with water only. Reaction with combustible organic materials, bases, moisture or with oxidizers may generate heat, hazardous gases and, possibly, fire or explosion. Do not add to dispensers or other equipment that is not dry and clean of any chemical remnants. Does not burn, but will decompose, from about 320°F (160°C), releasing toxic gases. Avoid comminution and dusting.

STORAGE AND DISPOSAL

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

STORAGE: Store in a dark, coel [below 86°F (30°C)], dry weil-ventilated area, in well-closed original containers, away from energy sources, combustible organic materials, oxidizers, strong bases and moisture.

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

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by inconcration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

SPILLS: When handling or dealing with spills, use impact-resistant goggles with side shields, or face shiek body-covering clothes, including impervious rubber or plastic gloves and boots; use a dust respirator if dusting occurs. Sweep up dry spills and dispose of as described for pesticide disposal. If drum contents are contaminated or decomposing, do not reseal container; isolate unsealed drum in the open or in a well-ventilated area; flood with large volumes of water if necessary.

IN CASE OF FIRE: Do not use ammonium phosphate extinguisher near water and HALOGENE G. Hazardous reactions may occur.

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DIRECTIONS FOR USE

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

INDUSTRIAL RECIRCULATING COOLING WATER SYSTEMS

Used effectively at dosages recommended to achieve exposures to one part per million (ppm) of 'active' residual bromine to control algal, bacterial and fungal slimes in industrial cooling towers; influent water systems, e.g., flow-through filters, and tagoons, etc.; heat-exchange water systems; industrial water scrubbing systems; brewery and canning pasteurizers; and industrial air-washing systems equipped with a mist eliminator.

Docage Rates

Initial dose: When noticeably fouled, add 2-6 lbs/10,000 gallons of water contained in the system. Repeat initial dosage until one ppm of 'active' residual bromine is established for at least 4 hours.

Subsequent dose: When microbial control is evident, add 1-3 lbs/10,000 gallons of water contained in the system. Repeat as needed to maintain one ppm of 'active' residual bromine for at least 4 hours.

ONCE-THROUGH INDUSTRIAL COOLING WATER SYSTEMS

Used for the control of algal, bacterial and fungal slimes, by adding to the system inlet, or before any other contaminated area in the system, in once through and closed-cycle fresh and sea water cooling systems; cooling ponds; canals; and lagoons.

Dosage Rates

initial dose: When noticeably fouled, add 2-6 lbs/10,000 galions of water contained in the system. Repeat initial dosage until one ppm of 'active' residual bromine is established for at least 4 hours.

Subsequent dose: When microbial control is evident, add 1-3 lbs/10,000 gallons of water contained in the system. Repeat as needed to maintain one ppm of 'active' residual bromine for at least 4 hours.

DO NOT SMOKE, DRINK OR EAT WHEN HANDLING.
KEEP CONTAINER TIGHTLY CLOSED WHEN NOT IN USE
DO NOT SHIP WITH FOODS, FEEDS, DRUGS OR CLOTHING

WARRANTY

Seller warrants that this product conforms to its chemical description and is reasonably fit for tha purposes stated on the label when used in accordance with label directions under normal conditions of use, but neither this warranty nor any other warranty of MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, express or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to Seller, and Buyer assumes the risk of any such

ACCEPTED with COMMENTS in EPA Letter Datest

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Under the Product Inserticide, Pungicide, and foxfest tide Act and fox the pesticide Neg. No. 1 Contents: 50 LBS registered under EPA Reg. No.



Proper Shipping Name:
OXIDIZING SUBSTANCES SOLID, NOS
(1-Bromo-3-Chloro-5,5-Dimethylhydantoin)
UN 1479

In event of emergency CALL TOLL FREE: 800-424-9300 (CHEMTREC)

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