

21 JUN 1994

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 Slow Dissolving Brominating Tablets
EPA Registration No. 8622-41
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 basic 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.

CONCURRENCES

SYMBOL	7505c							
SURNAME	<i>[Signature]</i>							
DATE	6/1/94							

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 medical attention immediately."

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

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 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."

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)

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HALOBROM

MINI SLOW DISSOLVING BROMINATING TABLETS FOR POOL & SPA

BACTERICIDE-ALGICIDE-DISINFECTANT NO CHLORINE ODOR

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

Provides: 61% Available Bromine
27% Available Chlorine

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide registered under EPA Reg. No. 8032-41

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KEEP OUT OF REACH OF CHILDREN

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.

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PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE

USES 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.

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 the 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 use.

EPA Reg. No 8622-41

EPA Est. No. 707-PA-1

EPA Est. No. 8622-1X-1

Manufactured by: AMERIBROM, INC.

52 VANDERBILT AVENUE

NEW YORK, NEW YORK 10017

(212) 286-4000

Made in Israel

NET CONTENTS: 50 LBS

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with COMMENTS in EPA Letter Dated

21 JUN 1994

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

8622-41

ACCEPTED
with COMMENTS
in EPA Letter # 678

1 JUN 1994

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

8032-41

DIRECTIONS FOR USE

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

HALOBROM[®] is a safe and effective slow dissolving bactericide, algicide and disinfectant that unlike other commonly used chemicals performs well over a broad pH range. Use the dosages recommended below as a guide in determining the proper amount of **HALOBROM[®]** necessary to keep your pool or spa sparkling clean and inviting. The dosage necessary for your pool or spa will change considerably depending upon those factors that burden the disinfection system.

Some of the factors that will vary the required dosages are water temperature, bather load, exposure to windblown debris, thunder or rain storms and length of filtration cycle.

SWIMMING POOLS: In newly filled pools, shock the pool if necessary. Follow directions for use on this label to establish an effective active bromine residual of between 2 and 3 ppm. Test water frequently using a reliable bromine test kit. Adjust the flow rate through the brominator if necessary, to maintain the active bromine residual. The following dosages are provided as a general rule of thumb. Automatic and floating brominators have use instructions peculiar to their design. Frequently a brominator must be filled to capacity every week -- while the adjustments allow the user to erode only the total amount of **HALOBROM[®]** necessary for proper sanitation. As suggested below, the slow dissolving nature of the chemical combined with the design features of the brominator require that a greater amount of chemical be exposed to the water.

RESIDENTIAL: Add 17 tablets per 10,000 gallons every 5-7 days or as needed to maintain a bromine residual of 2-3 ppm at all times. Apply weekly dose through the use of a floating tablet feeder such as the Multi-Chlor or an automatic brominator which will allow you to adjust the amount of bromine entering the water.

COMMERCIAL: Add 31 tablets per 10,000 gallons every 5-7 days or as needed to maintain an active bromine residual of between 3 and 5 ppm at all times.

SPAS AND HOT TUBS: Introduce 3 tablets per 300 gallons of spa water with the use of a floating tablet feeder or automatic brominator installed on the spa equipment. Adjust tablet feeder or brominator to obtain an active bromine residual of at least 2 ppm. Maintain spa by adding 3 tablets per 300 gallons every 5-7 days or as needed to maintain an active bromine residual of 2 ppm at all times. Spa water has a tendency to foam and cloud that is directly proportional to the amount of use it receives. This is due to the accumulation of body fats and oils and contaminants too small for the filtration equipment to remove, and to the rapid escalation of total dissolved solids in the water. To a great extent, defoamer, clarifier, shock treatments and demineralizers or sequestering agents can be used to clear the water. When this becomes impossible, draining, cleaning, and refilling the spa will be the most satisfactory way of solving this problem.

Pool Gallon Calculator (all dimensions in feet)

Square or Rectangular: Length x Width x Average Depth x 7.5 = Gallons

Round or Oval: Length x Width x Average Depth x 5.9 = Gallons

Each tablet weighs 0.70 oz. (19.8 grams)

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ACCEPTED
with COMMENTS
in EPA Letter # 624

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STORAGE AND DISPOSALUnder the Federal
Fungicide, and Rodenticide Act as
amended, for the
registered under EPA
Pesticide
Act as
pesticide
Reg. No.
8622-41

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

STORAGE: Store in a dark, cool [below 86°F (30°C)], dry well-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 nearest 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 incineration, 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 shield; 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 HALOBROM®. Hazardous reactions may occur.

DO NOT SMOKE, DRINK OR EAT WHEN HANDLING.

**SPECIAL PRECAUTIONS, PLEASE READ BEFORE OPENING CONTAINER
MISUSE MAY RESULT IN SERIOUS PERSONAL INJURY REQUIRING
HOSPITALIZATION. RELATED COMPLICATIONS MAY LEAD TO DEATH**

PREVENTION OF PHYSICAL INJURY:

1. This product emits a powerful bromine gas: Do not open container indoors. Hold away from face when opening to avoid breathing fumes.
2. 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.
3. Follow label instructions exactly. Do not take advice from others. Do not experiment.

PREVENTION OF PROPERTY DAMAGE: Contact between this product in its undissolved state and vinyl liners, painted surfaces or other property in or around the pool will result in permanent bleaching of the color.

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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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