

10897-7

1/14/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



Office of Pesticide Programs

Dave Johnson  
EHS Manager  
Hasa Inc.  
23119 Drayton St.  
Saugus, CA 91350

JAN 14 2010

**FILE COPY**

Subject: Hasa Chlorinating Granules  
EPA Registration No. 10897-7  
Application Dated: October 12, 2009  
Receipts Dated: October 20, 2009

Dear Mr. Johnson:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with conditions.

- Update the Storage and Disposal for Pesticides Containers and Containment
- Add subheadings, instructions for estimating pools size and updated instructions under the Swimming Pool Water section.
- Added Spa and Hot Tub Disinfection application usage.
- A copy of the Confidential Statement Formula (CSF) to be added to the file.

**Conditions:**

1. The residual removal language on the proposed label applies rigid non-refillable containers that are too large to shake (i.e., with capacities greater than 5 gallons or 50 lbs. Therefore, your reference to containers 2.2 or more pounds has been removed.
2. This product is registered as a Sanitizer. Therefore, all references to disinfection have been removed. You must provide disinfection data to support these claims.
3. You have added the table of dry measures beneath the "Ounces of Product to Achieve Desired Available Chlorine Level" chart. The Agency requested that you show the correlation between how much of this product when added to water is needed to achieve the desired ppm level. You must combine the charts to show how much product is required from new pool start up to super chlorination.

**General Comments:**

A stamped copy of the labeling accepted with conditions is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

The proposed basic CSF, dated October 12, 2009, will be made part of the file for this product.

Should you have any questions or comments concerning this letter, please contact Wanda Henson at 703-308-6345.

Sincerely,



Wanda Y. Henson  
Acting Product Manager – Team 32  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

1/16/10

# Hasa Hydroguard Chlorinating Granules

For Clean Sparkling Water  
Sanitizes and Shocks – Needs No Conditioner

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

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Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
amended, for the pesticide,  
registered under EPA Reg. No. 10897-7

**Active Ingredient:**

Sodium Dichlor-s-triazinetrione dihydrate ..... 98.0%  
Other Ingredients:.....2.0%  
Total.....100.0%  
Available Chlorine.....56.0%

**KEEP OUT OF REACH OF CHILDREN**

## DANGER

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF INHALED	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF SWALLOWED	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

**See additional precautions and directions on back panel**

Manufactured for:  
Hasa Inc.,  
23119 Drayton St.  
Saugus, CA 91350

EPA Reg. No. 10897-7

EPA Est. No. 10897-AZ-1, 10897-CA-1, 10897-CA-2, 10897-WA-1

Net Contents:

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Read Entire Label Before Using This Product

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER: CORROSIVE:** Causes irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. Wear safety glasses, goggles, or face shield, protective clothing, and rubber gloves when handling this product. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Irritating to nose and throat. Avoid breathing dust.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and aquatic organisms. 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 according to label directions. Use clean dry utensils. Do not mix with other chemicals. Do not add this product to any dispensing device containing remnants of any other product. Such use or contamination with moisture, organic matter, or other chemicals may cause a violent reaction leading to the generation of heat, liberation of hazardous gases, or possible fire and/or explosion.

**STORAGE AND DISPOSAL**

**STORAGE:** Keep this product dry in a tightly closed container, when not in use. Store in a cool, dry, well-ventilated area away from heat or open flame. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well-ventilated area and flood with large volumes of water, if necessary.

*[Insert the following statement for all containers of 2.2 or more pounds. Chapter 13, Section III of the USEPA Label Review Manual exempts the following instructions for residential/household use products, which for this product are packaged in less than 2.2 gallon containers.]*

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

**PESTICIDE DISPOSAL:**

*[Insert the following statement for all containers of 2.2 or more pounds.]*

Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

*[Insert the following statement for all containers.]*

For product that cannot be used, call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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[NOTE: The following residue removal instructions shall appear on all non-refillable and refillable containers of 2.2 or more pounds as required by EPA regulations 40 CFR §156.140, §156.144, §156.146, §156.156. EPA regulation 40 CFR §156.144 exempts residue removal instructions for residential/household use products, which for this product are packaged in less than 2.2 pound containers.]

**RESIDUE REMOVAL (Prior to Disposal):**

[Insert the following cleaning responsibility statements for refillable containers of 2.2 or more pounds only.]

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

[Insert the following rinse instructions for non-refillable and refillable containers of 2.2 or more pounds.]

Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

**Triple Rinse:** Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

**Pressure Rinse:** Pressure rinse as follows: Empty the remaining contents into application equipment or mix tank. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

**CONTAINER DISPOSAL:** [Depending on the type of packaging container, insert one of the following specific container type instructions below]

Non-refillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available.

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Place in trash or offer for recycling if available.

**DIRECTIONS FOR USE**

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

**SWIMMING POOL WATER**

**GENERAL INSTRUCTIONS AND INFORMATION** - When used as directed, this product is an effective swimming pool sanitizer. The amount and frequency of use is governed by the number of swimmers, outside temperature, and contamination from outside sources (e.g. windstorms, rain, suntan oils, perspiration, and other human wastes). To avoid damage to pool surface, use a pool brush to disperse any granules that may have settled to the bottom of the pool. Do not allow undissolved product to rest against bleachable pool surfaces.

**NEW POOL OR SPRING START UP** – Adjust total alkalinity to 80- 150 ppm and pH to 7.2 – 7.8. Add the appropriate amount (See dosage chart) of this product to obtain a chlorine residual of 5 to 10 ppm by broadcasting this product over surface of pool water while filter and pump are operating. Pool is ready for use when chlorine residual is between 1 and 4 ppm. Entry into treated pools is prohibited above levels of 4 ppm due to risk of bodily harm.

**TESTING** – Use a reliable test kit with fresh solutions to determine pH, available chlorine residual, and alkalinity levels. Ideal swimming conditions are pH between 7.2 and 7.8, available chlorine residual between 1 and 4 ppm and a total alkalinity between 80 to 150 ppm.

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**MAINTENANCE** – Use appropriate amount (See dosage chart) of this product to maintain available chlorine residual between 1 to 4 ppm. Check pH and chlorine residual daily, or as needed to maintain necessary chlorine residual.

**SUPER-CHLORINATION** – Every 7 – 10 days during the swimming season, after heavy pool usage, windstorms, rain, or whenever pool water has lost its sparkle, super-chlorination or shock treatment is required. Add the appropriate amount (See dosage chart) of this product to obtain a chlorine residual of 5 to 10 ppm by broadcasting this product over surface of pool water while filter and pump are operating. Pool is ready for use when chlorine residual is between 1 and 4 ppm. Re-entry into treated pools is prohibited above levels of 4 ppm due to risk of bodily harm.

**HELPFUL HINTS** – Do not adjust pH and chlorinate at the same time. Always adjust pH first. Stabilizing or “conditioning” pool water with cyanuric acid will reduce the degradative effects of sunlight upon the chlorine residual. If possible, add this product either in the morning or at night. Whenever pH or chlorine residual are adjusted, allow filter and pump to run at least two hours after addition of product.

**ESTIMATING POOL SIZE** – To estimate the number of gallons in your pool, use the appropriate formula below (Use measurements in feet only):

**Rectangular Pools:** Length x Width x Average Depth x 7.5

**Round:** Diameter x Diameter x Average Depth x 5.9

**Oval:** Maximum Length x Maximum Width x Average Depth x 5.9

**Free Form:** Surface Area (Sq. feet) x Average Depth x 7.5

**DOSAGE CHART** – To obtain an approximate level of available chlorine (ppm - parts per million) in the pool, add the indicated amount of this product corresponding to the capacity of the pool. Always check the level of available chlorine with a test kit to ensure efficacy.

*[The following chart is applicable to all sizes 7 lbs or greater. For sizes of 4 lbs or greater but less than 7 lbs, the dosage recommendations for 50,000 gallon pools will not appear on the label, since sizes less than 7 lbs would not be sufficient for super-chlorination of these larger pools. Similarly, for sizes of 2 lbs to less than 4 lbs, the label will only carry the dosage recommendations up to 10,000 gallons, and for 1 lb to less than 2 lb sizes, the label will only carry dosage recommendations up to 5,000 gallons.]*

Ounces of Product to Achieve Desired Available Chlorine Level								
Desired available Chlorine Level (ppm)	Number of Gallons of Pool Water (Gallons)							
	100	500	1,000	2,500	5,000	10,000	20,000	50,000
1.0	0.02	0.1	0.2	0.6	1.2	2.4	4.9	12.0
2.0	0.05	0.2	0.5	1.2	2.4	4.9	9.7	24.0
3.0	0.07	0.4	0.7	1.8	3.7	7.3	14.6	36.0
5.0	0.12	0.6	1.2	3.0	6.0	12.0	24.0	61.0
10.0	0.24	1.2	2.4	6.0	12.0	24.0	49.0	122.0

**Table of Dry Measures:**

4 oz. = 0.25 lb.

16 oz. = 1 lb.

48 oz. = 3 lb.

80 oz. = 5 lb.

8 oz. = 0.5 lb.

32 oz. = 2 lb.

64 oz. = 4 lb.

160 oz. = 10 lb.

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**SPA AND HOT TUB**

**GENERAL INSTRUCTIONS AND INFORMATION** - When used as directed, this product is an effective spa and hot tub sanitizer. The amount and frequency of use is governed by the number of bathers, outside temperature, and contamination from outside sources (e.g. windstorms, rain, suntan oils, perspiration, and other human wastes).

**NEW SPA OR START UP** – Add 4 teaspoons (tsp.) of this product for each 400 gallons of water to yield 5 to 10 ppm available chlorine by weight. Broadcast directly across water with filter and pump operating. The next day check chlorine residual with a test kit. If the reading is between 1.5 – 5.0 ppm you may use the spa or hot tub. If the reading is below this level, repeat treatment until the 1.5 – 5.0 ppm residual is attained. Do not use until the required residual is reached. Entry into treated spas is prohibited above levels of 5 ppm due to risk of bodily harm.

**TESTING** – Check chlorine residual before starting spa heater and every 20-30 minutes during use. Spas should maintain a residual of 1.5 – 5.0 ppm available chlorine. Adjust and maintain spa water pH between 7.2 – 7.8. Adjust and maintain the alkalinity of the spa between 80 to 150 ppm.

**MAINTENANCE** – Add 1 tsp. daily or as needed to maintain an available chlorine residual of 1.5 – 5.0 ppm, as determined by a suitable test kit. Use a test kit and adjust dosage if necessary. Add this product whenever chlorine residual is 1.5 ppm or less at the rate of 1 tsp. per 400 gallons.

Note: 1 tsp will provide 2.0 ppm available chlorine residual per 400 gallons. 1 oz equals 5 teaspoons.

**SUPER-CHLORINATION** After heavy use, rains storms, dust storms, contamination, and at least every 7-10 days superchlorinate or shock the spa or hot tub. Superchlorination is the addition of several times the normal amount of chlorinating chemical to destroy combined chlorine residuals, perspiration, and other chemicals which may build up in the spa water. Super-chlorinate by adding 4 tsp. of this product for each 400 gallons of water to yield 5 to 10 ppm available chlorine by weight. Do not use again until chlorine residual is back within the 1.5 – 5.0 ppm range. Re-entry into treated spas is prohibited above levels of 5 ppm due to risk of bodily harm.

**ESTIMATING SPA SIZE** – To estimate the number of gallons in your spa, use the appropriate formula below (Use measurements in feet only):

**Rectangular Spas:** Length x Width x Average Depth x 7.5

**Round:** Diameter x Diameter x Average Depth x 5.9

**Oval:** Maximum Length x Maximum Width x Average Depth x 5.9

**Free Form:** Surface Area (Sq. feet) x Average Depth x 7.5

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