

10897-7

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

JAN 11 2011

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

**FILE COPY**

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

Subject: Hasa Hydroguard Chlorinating Granules  
EPA Registration No.: 10897-7  
Application Date: 11/22/2010  
Receipt Date: 12/03/2010

Dear Mr. Dave Johnson:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions.

**Proposed Amendment**

- Label Amendment

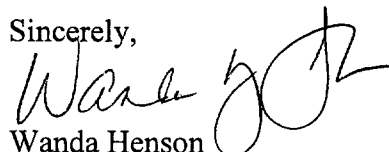
**General Comments and Conditions**

In response to your letter dated November 22, 2010, products with labels that allow household/residential use must have the statement not to reuse or refill the container as per 40 CFR 156.140(a)(2). These containers would have the risk of containment in reuse from the pesticide if not cleaned properly. Hence refillable container instructions are not applicable to household/residential products to protect customers and these instructions cannot be included on product labels with only household/residential uses.

In addition, concerning our comment in our letter dated October 28, 2010, products with labels with both household/residential use and commercial use must be separated as per storage and disposal instructions. The Agency recommends submitting "Master" labels which contain all the claims, use sites, directions, storage/disposal statements, and environmental hazard statements on one label. Since your product is sold in residential and commercial markets, your "Storage and Disposal" statements must be revised to comply with the Container Rule for those use sites.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6345 or by e-mail at [henson.wanda@epa.gov](mailto:henson.wanda@epa.gov) or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at [carl.jaclyn@epa.gov](mailto:carl.jaclyn@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read "Wanda Henson", with a stylized flourish at the end.

Wanda Henson  
Product Manager (32)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JAN 11 2011

# Hasa Hydroguard Chlorinating Granules

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

**For Clean Sparkling Water  
Sanitizes and Shocks – Needs No Conditioner**

**Active Ingredient:**

- Sodium Dichloro-s-triazinetriane, dihydrate ..... 98.0%
- Other Ingredients:.....2.0%
- Total.....100.0%
- Available Chlorine.....56.0%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

<b>FIRST AID</b>	
<b>IF IN EYES</b>	<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>
<b>IF ON SKIN OR CLOTHING</b>	<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>
<b>IF INHALED</b>	<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>
<b>IF SWALLOWED</b>	<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>
<b>HOT LINE NUMBER</b>	
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.	
<b>NOTE TO PHYSICIAN</b>	
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:

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

**PESTICIDE DISPOSAL:** 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.

**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.

**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.]*

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

**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