

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 11 2011

**FILE COPY** 

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

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

Subject:

Hasa Small Chlorinating Tablets

EPA Registration No.: 10897-8 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 15, 2010 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 <a href="https://example.gov">henson.wanda@epa.gov</a> or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at <a href="mailto:carl.jaclyn@epa.gov">carl.jaclyn@epa.gov</a>. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Wanda Henson

Product Manager (32)

Regulatory Management Branch II Antimicrobials Division (7510P)

ACCEPTED with COMMENTS in EPA Letter Dated:

## Hasa

# Small Chlorinating Tablets Under the Federal Insecticide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 10897-8

### Controls Algae and Bacteria in Swimming Pool Water

Active Ingred			
Trichloro-s-triazinetrione			c c
Other Ingredients:			c c c o <b>c o</b>
Total		100.0%	6 6 6 6 6 6
	Available Chlorine90.0%		
		000000	0000
	KEEP OUT OF REACH OF CHILDREN	000000	0000
	DANGER	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
	FIRST AID		
IF IN EYES	<ul> <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> </ul>		
	Call a poison control center or doctor for treatment advice.		
IF ON SKIN	Take off contaminated clothing.		
OR	Rinse skin immediately with plenty of water for 15-20 minutes		
CLOTHING	Call a poison control center or doctor for treatment advice.		
<ul> <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> </ul>			
			on,
	Call a poison control center or doctor for further treatment advice.		
IF SWALLOWED	<ul> <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> </ul>		
	<ul> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> </ul>		
	Do not give anything by mouth to an unconscious person.		
	HOT LINE NUMBER		
Have the product container or label with you when calling a poison control center or doctor, or going for			
treatment. You ma	y also contact 1-800-424-9300 for emergency medical treatment inform	nation.	
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. 10897-8 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 – This product is manufactured for use in tablet chlorinators, wherein they are slowly dissolved as the water flows over the tablets to control algae growth, kill bacteria, and destroy organic contaminants in the swimming pool. Do not throw the tablets directly into the water or allow them to come into contact with concrete and/or vinyl surfaces, staining may result.

NEW POOL OR SPRING START UP – Using a suitable test kit, adjust total alkalinity to 80 - 150 ppm and pH to 7.2 - 7.8. Superchlorinate (Shock) the pool with a separate fast dissolving granular or liquid chlorinating product to obtain an available chlorine residual of 5 - 10 ppm. Follow superchlorination or "shock" directions on the label of the selected product. Use pool when the available chlorine residual is in the 1 - 4 ppm range and the pH is between 7.2 - 7.8. 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 and 150 ppm.

MAINTENANCE – Follow use directions which come with the tablet chlorinator. In floating chlorinators try 10-15 tablets per week per 10,000 gallons of water. Use a reliable test kit to check chlorine residual. Twenty-four hours after treatment begins, adjust feed rate to maintain a 1 – 4 ppm residual. Three (3) tablets will provide 1 ppm available chlorine per 10,000 gallons of pool water.

**SUPER-CHLORINATION** – Superchlorination, the addition of several times the normal amount of chlorinating chemical, is necessary to establish an initial chlorine residual in a freshly filled pool, every 7-10 days during the swimming season and after special problems, such as heavy swimming use, dust and wind storms, rain and unusually hot weather. A separate fast dissolving granular or liquid chlorinating product should be used. Follow superchlorination or "shock" directions on the label of the selected product. Re-entry into treated pools is prohibited above levels of 4 ppm due to risk of bodily harm.

**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