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10897 -11



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

JAN 1 ( 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 Hydroguard Chlorinating Granules, Jumbo Swimming Pool Chlorinating

**Tablets** 

EPA Registration No.: 10897-11 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 <a href="https://example.com/hensen.wanda@epa.gov">hensen.wanda@epa.gov</a> or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at <a href="https://example.com/hensen.wanda@epa.gov">earl.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)

# Hasa **Jumbo Swimming Pool Chlorinating Tablets**

## Controls Algae and Bacteria in Swimming Pool Water

| Active Ingredient:         |            |       |
|----------------------------|------------|-------|
| Trichloro-s-triazinetrione |            | 99.0% |
| Other Ingredients:         | ********** | .1.0% |
| Total                      | 10         | 00.0% |
| Available Chlorine         | 90.0%      | Ā     |

KEEP OUT OF REACH OF CHILDREN

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JAN 11 2011

## **DANGER**

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

|                              | FIRST AID regristered under EP   |
|------------------------------|--|
| 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> <li>Call a poison control center or doctor for treatment advice.</li> </ul>  |
| IF ON SKIN<br>OR<br>CLOTHING | <ul> <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> <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> <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  |
|                              | container or label with you when calling a poison control center or doctor, or going for y also contact 1-800-424-9300 for emergency medical treatment information.  |
|                              | NOTE TO PHYSICIAN  |
| F                            | 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. 10897-11
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. 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 – These tablets are manufactured for use in erosion type feeders, wherein they are slowly dissolved as the water flows over the tablets to control algae growth, kill bacteria, and destroy of ganic contaminants in the swimming pool. Do not throw the tablets directly into the water. Contact with concrete or vinyl walls may result in staining.

NEW FOOL 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.

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**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 – If the directions for use supplied with the chlorinator are missing or unclear, try 2 tablets per 10,000 gallons each 7-10 days. Twenty-four hours after filling the tablet feeder, check the available chlorine with a test kit. If necessary, adjust the feed rate so that the chlorine residual is maintained between 1 - 4 ppm. If you are unable to maintain a residual after three days, superchlorinate the pool. Disconnect or remove feeder, superchlorinate and reconnect feeder when residual is below 4 ppm. Readjust feed rate to maintain a 1 – 4 ppm residual. One tablet will provide 5.25 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.

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**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

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