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04-21-2011

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

APR 21 2011

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: 03/31/2011
Receipt Date: 04/06/2011

Dear Mr. Dave Johnson:

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

Proposed Amendment

- Update of Environmental Hazards and Storage & Disposal sections

Conditions:

Revise the label as follows:

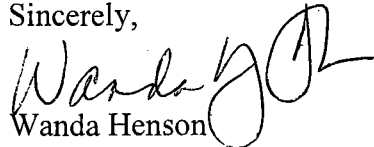
- 1) Align the ingredient statement to have percentages lined up as per 40 CFR 156 – Labeling Requirements for Pesticides and Devices.
- 2) Revise third statement of the Precautionary Statements to read:
“Harmful if absorbed through skin, inhaled or swallowed.”
- 3) Delete “Instructions and” from “General Instructions and Information” to read “General Information.”
- 4) Delete the “Super-chlorination” section under the Directions for Use since this product is does not support the use for shocking swimming pools.

General Comments

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

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 or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at 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,



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

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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.

[NOTE: The following effluent discharge labeling statement shall appear on all product containers equal to or greater than 5 gallons (liquid) or 50 pounds (solid, dry weight), per USEPA PR Notice 95-1]

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: Non-refillable container. Do not reuse or refill this container. 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 organic 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 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.

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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.

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