JUL 2 2003

Mr. George Anastasiou Lewis & Harrison 122 C Street, N.W., Suite 740 Washington, DC 20001

Subject: Neo-Chlor 90

EPA Registration Number 33980-1

Application Date: 5/28/03 Receipt Date: 6/11/03

Dear Mr. Anastasiou:

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

To update the "first aid" statement in accordance with PR Notice 2001-1

Conditions

- 1. In the "Ingredient" statement delete "and related isocyanurates".
- 2. Align the "Ingredient" statement to read:

ACTIVE INGREDIENT	
Trichloro-s-triazinetrione	99.0%*
INERT INGREDIENTS	1.0%
TOTAL	100.0%

- *Available Chlorine 90%
- 3. You must provide a "Hotline Telephone Number" under the First Aid Statement as per PR Notice 2001-1.

CONCURRENCES							
SYMBOL							
BURNAME)						!	
DATE					***************	******	
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EPA Form 1320-1A (1/90)

PHYSICAL AND CHEMICAL HAZARDS

Strong oxidizing agent. Mix only with water. Use clean dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture, organic matter, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible generation of fire and explosion. In case of contamination or decomposition, do not reseal container. If possible isolate each container in open air or well-ventilated area. flood with large volumes of water if necessary.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Formulators using this product are responsible for obtaining EPA registration of their formulated products. For formulation into end-use products intended for use in swimming pools, spas and hot tubs, commercial and industrial water cooling towers and evaporative condensers, for sanitization of food and non-food contact surfaces, oil recovery drilling muds and packer fluids, secondary oil recovery systems, bathroom sanitization, air washer systems, brewery pasteurizer water, hatchery equipment and poultry houses, farm premises and equipment, hospital premises and equipment, laundry sanitizers, and leather and leather products.

STORAGE AND DISPOSAL

Storage: Keep product dry in tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat or open flame. In case of decomposition, isolate container, if possible, and flood with large amounts of water to dissolve material before discarding.

Pesticide Disposal: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container disposal: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Notice to Buyer

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use. Seller disclaims all other warranties, expressed or implied, including any warranty of FITNESS of MERCHANTABILITY.

EPA Reg. No. 33980-1 EPA Est. No. 33980-JP-1 Net contents: Contents manufactured in Japan

SHIKOKU CHEMICALS CORP. TOKUSHIMA JAPAN

GRANULAR NEO-CHLOR 90 (TRICHLOROISOCYANURIC ACID)

ACTIVE INGREDIENT:

Trichloro-s-triazinetrione and related isocyanurates

99.0%*

ACCEPTED
with COMMENTS
EPA Letter Dated:

INERT INGREDIENTS:

TOTAL

 $\frac{1.0\%}{100\%}$

JUL 2 - 2003

*Available chlorine

90%

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

KEEP OUT OF REACH OF CHILDREN

33980-1

DANGER

FIRST AID				
If swallowed	Call poison control center or doctor immediately for treatment advice.			
	• Have a person sip a glass of water if able to swallow.			
	• Do not induce vomiting unless told to do so by the poison control center or doctor.			
	• Do not give anything by mouth to an unconscious person.			
If in eyes	• Hold eye open and rinse slowly and gently with water for 15-20 minutes.			
	• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.			
	• Call a poison control center or doctor for treatment advice.			
If on skin or	• Take off contaminated clothing.			
clothing	• Rinse skin immediately with plenty of water for 15-20 minutes.			
~	• Call a poison control center or doctor for treatment advice.			
If inhaled	Move person to fresh air.			
	• If person is not breathing, call 911 or an ambulance, then give artificial respiration,			
	preferable by mouth to mouth, if possible.			
	• Call a poison control center or doctor for further treatment advice.			
Have the pro	oduct container or label with you when calling a poison control center or doctor, or going for			
•	treatment.			
Not	to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.			

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

CORROSIVE: Causes irreversible eye damage and skin burns. May be harmful if absorbed through skin. May be fatal if inhaled. Do not breath dust or spray mist. Irritating to nose and throat. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear 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 or using tobacco. Remove contaminated clothing and wash before reuse.

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 EPA.

General Comments

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Delores Williams at (703) 308-6372.

Sincerely,

Robert S. Brennis Product Manager 32

Regulatory Management Branch II Antimicrobials Division (7510C)