

PLEASE NOTE

This image contains more than one label approved for this product on this date.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

May 13, 2004

Wendy A. McCombie
Agent for Shikoku Chemicals Corporation
Lewis & Harrison
122 C Street NW Ste. 740
Washington, DC 20001

Subject: Neo-Chlor 90
EPA Registration No. 33980-1
Application Date: April 16, 2004
Receipt Date: April 16, 2004

Dear Ms. McCombie:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- addition of alternate brand name "NEO-CHLOR 90 LS"

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Mitchell
Product Reviewer 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

CONCURRENCES

| | | | | | | | |
|---------|----------|----------|--|--|--|--|--|
| SYMBOL | 7510C | 7510C | | | | | |
| SURNAME | E. Kelly | Mitchell | | | | | |
| DATE | 5/13/04 | 5-13-04 | | | | | |

285



United States
Environmental Protection Agency
 Washington, DC 20460

- Registration
 Amendment
 Other

OPP Identifier Number
 265394

Application for Pesticide - Section I

| | | |
|--|---|--|
| 1. Company/Product Number 33980-1 | 2. EPA Product Manager Wanda Mitchell | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Neo-Chlor 90 | PM# Team 32 | |
| 5. Name and Address of Applicant (Include ZIP Code) Shikoku Chemicals Corporation 301 North Rampart Street #C Orange, CA 92668 | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |
| NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW <input type="checkbox"/> Check if this is a new address | | |

Section - II

- Amendment - Explain below. Final printed labels in response to Agency letter dated _____
 Resubmission in response to Agency letter dated _____ "Me Too" Application
 Notification - Explain below. Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

ALTERNATE BRAND NAME : "NEO-CHLOR 90 LS"

Notification of ALTERNATE BRAND NAME in Accordance With PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____

Date: _____

Section - III

| | | | |
|--|---|---|--|
| 1. Material This Product Will Be Packaged In: | | | |
| Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | 2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) |
| *Certification must submitted | | If "Yes" Unit Packaging wgt. No. per container | If "Yes" Package wgt. No. per container |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | 4. Size(s) Retail Container | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | | |

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

| | | |
|--|---|--|
| Name Wendy A. McCombie, Lewis & Harrison 122 C Street NW Ste. 740, Washington DC 20001 | Title Agent for Shikoku Chemicals Corp. | Telephone No. (Include Area Code) 703-924-0330 ext. 13 |
|--|---|--|

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received

(Stamped)

| | | |
|---|---|---|
| 2. Signature | 3. Title Agent for Shikoku Chemicals Corp. | 6. Date Application Received (Stamped) |
| 4. Typed Name Wendy A. McCombie, Lewis & Harrison | 5. Date 16 April 2004 | |

4 8 5

Granular

NEO-CLOR 90 LS

(TRICHLOROISOCYANURIC ACID)

| | |
|----------------------------------|--------|
| ACTIVE INGREDIENT: | |
| Trichloro-s-triazinetriene | 99.0%* |
| INERT INGREDIENTS: | 1.0% |
| TOTAL | 100% |

*Available chlorine 90%

KEEP OUT OF REACH OF CHILDREN

DANGER

| FIRST AID | |
|--|--|
| If swallowed | <ul style="list-style-type: none"> • 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 | <ul style="list-style-type: none"> • 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 clothing | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice. |
| If inhaled | <ul style="list-style-type: none"> • 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 product 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.

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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

NEXT

LABEL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

May 13, 2004

Wendy A. McCombie
Agent for Shikoku Chemicals Corporation
Lewis & Harrison
122 C Street NW Ste. 740
Washington, DC 20001

Subject: Neo-Chlor 90
EPA Registration No. 33980-1
Application Date: April 16, 2004
Receipt Date: April 16, 2004

Dear Ms. McCombie:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- addition of alternate brand name "NEO-CHLOR 90 EX"

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Mitchell
Product Reviewer 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

CONCURRENCES

| | | | | | | | | |
|---------|-----------|----------|--|--|--|--|--|--|
| SYMBOL | 7510C | 7570C | | | | | | |
| SURNAME | E. Berg | Mitchell | | | | | | |
| DATE | 5/13/2004 | 5-13-04 | | | | | | |



EPA

United States
Environmental Protection Agency
 Washington, DC 20460

- Registration
 Amendment
 Other

OPP Identifier Number
265394

Application for Pesticide - Section I

| | | |
|--|---|--|
| 1. Company/Product Number 33980-1 | 2. EPA Product Manager Wanda Mitchell | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Neo-Chlor 90 | PM# Team 32 | |
| 5. Name and Address of Applicant (Include ZIP Code) Shikoku Chemicals Corporation 301 North Rampart Street #C Orange, CA 92668 | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW
 Check if this is a new address

Section - II

- Amendment - Explain below. Final printed labels in response to Agency letter dated _____
 Resubmission in response to Agency letter dated _____ "Me Too" Application
 Notification - Explain below. Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

ALTERNATE BRAND NAME : "NEO-CHLOR 90 EX"

Notification of ALTERNATE BRAND NAME in Accordance With PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____

Date: _____

Section - III

| | | | | | |
|---|---|--|--------------------------------------|---|-------------------|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| *Certification must submitted | | If "Yes" Unit Packaging wgt. | No. per container | If "Yes" Package wgt. | No. per container |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container | | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | | <input type="checkbox"/> Other _____ | | |

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

| | | |
|--|---|--|
| Name Wendy A. McCombie, Lewis & Harrison 122 C Street NW Ste. 740, Washington DC 20001 | Title Agent for Shikoku Chemicals Corp. | Telephone No. (Include Area Code) 703-924-0330 ext. 13 |
|--|---|--|

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6 Date Application Received

(Stamped)

| | |
|---|---|
| 2. Signature | 3. Title Agent for Shikoku Chemicals Corp. |
| 4. Typed Name Wendy A. McCombie, Lewis & Harrison | 5. Date 16 April 2004 |

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32

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

16 April 2004

HAND DELIVERED

Document Processing Desk [NOTIFY]
Office of Pesticide Programs (7504C)
Antimicrobials Division
US Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

ATTENTION: Ms. Wanda Mitchell
Product Reviewer, Team 32

SUBJECT: Shikoku Chemicals Corporation
Neo-Chlor 90 (EPA Reg. No. 33980-1)
Alternate Brand Name Notification for Neo-Chlor 90 EX

Dear Ms. Mitchell:

As Agent for Shikoku Chemicals Corporation (Shikoku), we are submitting an application for Pesticide Notification to propose an alternate brand name for **Neo-Chlor 90**, in accordance with PR Notice 98-10. The alternate brand name for **Neo-Chlor 90** is:

Neo-Chlor 90 EX

Enclosed, please find the following documents to support this Notification Of Alternate Brand Name:

- a) Pesticide Application Form (OPP ID No. 265394); and,
- b) Three copies of the product label bearing the Alternate Brand Name.

Insofar as Lewis & Harrison is acting as the "Company Contact" and "Company Agent" for Shikoku, please direct all correspondence directly to us at **122 C Street NW, Suite 740, Washington, DC 20001**. If you have any questions, please contact me by telephone at 202-393-3903 ext 13 or by e-mail at wmccombie@lewisharrison.com.

Thank you very much for your attention to this matter.

Sincerely,



Wendy A. McCombie
Agent for,
Shikoku Chemicals Corporation

WAM/wm
Enclosures (2)

Granular

NEO-CLOR 90 EX

(TRICHLOROISOCYANURIC ACID)

| | |
|----------------------------------|--------|
| ACTIVE INGREDIENT: | |
| Trichloro-s-triazinetrione | 99.0%* |
| INERT INGREDIENTS: | 1.0% |
| TOTAL | 100% |

*Available chlorine 90%

KEEP OUT OF REACH OF CHILDREN

DANGER

| FIRST AID | |
|--|--|
| If swallowed | <ul style="list-style-type: none"> • 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 | <ul style="list-style-type: none"> • 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 clothing | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice. |
| If inhaled | <ul style="list-style-type: none"> • 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 product 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.

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