

42177-74

11/7/2012

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UNI STATES ENVIRONMENTAL PROTECT AGENCY

November 07, 2012

Annette Niemiec
EPA Government Relations Coordinator
Alliance Trading, Inc.
109 Northpark Blvd. 4th Floor
Covington, LA 70433

Subject: MASTER E-Z CLOR BROMAGEN
EPA Registration No.: 42177-74
Notification Date: October 16, 2012
EPA Receipt Date: October 22, 2012

Dear Ms. Niemiec,

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

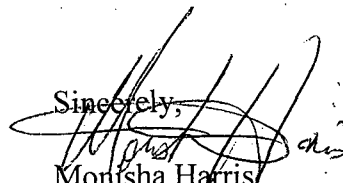
Proposed Notification

- Adding optional marketing statements for a three step program designed to be used as a consumer guide.
- Adding alternate brand name: "Regal Pool Care System".

General Comments

Based on a review of the submitted materials, to add optional marketing statement and an alternate brand name are acceptable and apart of the record on file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 305-5027 or by e-mail at rivas.lorena@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,


Monisha Harris
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL	7510P	7510P					
SURNAME	L. Rivas	M. Harris					
DATE	11/8/12	11/13/12					



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42177-74	2. EPA Product Manager Monisha Harris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Master E-Z Clor Bromagen	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) Alliance Trading, Inc. 109 Northpark Blvd., 4th Floor Covington, LA 70433 <input type="checkbox"/> Check if this is a new address	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 _____	

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.)

Notification to add additional optional marketing statements and an alternate brand name: Regal Pool Care System.

"This notice is consistent with the provisions of PR Notice 98-10 and EPA regulations 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 USC Section 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 98-10 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."

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 be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container

5. Location of Label Direction: On Label On Labeling accompanying product

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued Stenciled Other _____

Section - IV

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

Name Annette Niemiec	Title EPA Government Relations Coord.	Telephone No. (Include Area Code) (985) 801-5714
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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.

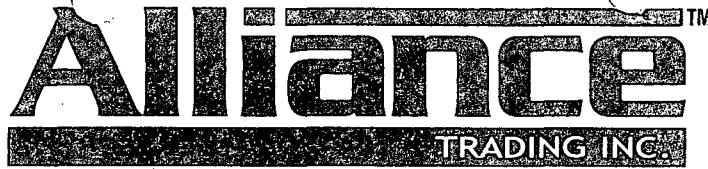
2. Signature

3. Title
EPA Government Relations Coordinator

4. Typed Name
Annette Niemiec

5. Date
10-16-2012

6. Date Application Received (Stamped)



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10-16-2012

Attention: Ms. Monisha Harris / PM 32
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm. S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

SUBJECT: EPA Reg. No. 42177-74 Master E-Z Clor Bromagen

Notification per PR Notice 98-10 to add marketing statements and an alternate brand name.

Dear Ms. Harris:

Please process the following proposed label changes submitted via Notification:

1. Additional optional marketing statements for a three step program designed to be used as a consumer guide. We are proposing to identify steps on our entire product line that are consistent with each product's accepted uses and accepted marketing statements. For clarity purposes we have included all possible language in the master label.
2. Addition of an alternate brand name: **"Regal Pool Care System"**.

If you have any questions or need additional information, please feel free to contact me via telephone at (985) 801-5714 or e-mail below.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Annette Niemiec", is written over the typed name.

Annette Niemiec
EPA Government Relations Coordinator
Annette.niemiec@poolcorp.com

Enclosures:

- Application form (EPA Form 8570-1)
- Master E-Z Clor Bromagen label, 1 copy annotated in red
- Mock up front panel of label to illustrate three step system

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{NOTIFICATION 08-25-2011}

EPA REG. NO. 42177-74 MASTER E-Z CLOR BROMAGEN Alliance Trading, Inc.

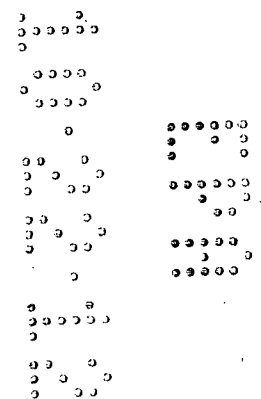
MASTER LABEL {Latest changes in red}
All text in square brackets [xxx] is optional
and may/may not appear on any final labels
All text in round braces {xxx} is for
information
only and will NOT appear on any final labels}

{front label}

{MARKETING CLAIMS}

- {statements available to all labels}
- [Bactericide-Algaecide-Disinfectant]
- [Bactericide]
- [Algaecide]
- [Disinfectant]
- [No Chlorine Odor]
- [Tablets 1" for pools]
- [1" tablets]
- [20 gram tablets]
- [for swimming pools]
- [sanitizer]
- [sanitizer for swimming pools]
- [disinfectant for swimming pools]
- [algaecide for swimming pools]
- [bactericide for swimming pools]
- [does not contain stabilizer]
- [non-stabilized]
- [swimming pool water sanitizer]
- [swimming pool water bactericide]
- [swimming pool water algaecide]
- [controls algae]
- [Non-Chlorine Sanitizer]
- [kills algae]
- [kills bacteria]
- [for indoor pools, no chlorine odor]
- [for use in brominators]
- [small tablets]

NOTIFICATION
Date Reviewed: 11-7-12
Reviewed By: L. R. VAS



[small tablets for brominators]
[small tablets for bromine feeders]
[For Pools]

{An easy to follow ABC or 1,2,3,4 step identification to help guide consumers may be on some brands using letter or number on front of pail along with compatible chart below}

[#2], [Step 2] {some brands of our 42177-17 could be marked with #2 or step 2 as part of a 4 step program to treat swimming pool}

[A], [Step A] {some brands of our 42177-17 could be marked with A or step A as part of a three step (A, B, C,) program to treat swimming pool}

3-STEP A, B, C, POOL TREATMENT PROGRAM		
A. SANITIZE	B. SHOCK	C. ALGAECIDE

4-STEP BASIC POOL TREATMENT PROGRAM			
1. WATER BALANCE	2. SANITIZE	3. SHOCK	4. ALGAECIDE

{Alternative 3 Step Program}

3-STEP POOL TREATMENT PROGRAM		
1. SANITIZE	2. SHOCK-OXIDIZE	3. ALGAE PREVENTION

{Alternative three step program marketing statements available to all labels. Steps 1, 2, and 3 will only be available to their respective product type/ approved use. We have included all statements here for clarity purposes.}

[STEP 1] [SANITIZE]

[SANITIZERS] [The key to maintaining a crystal clear pool is a steady routine of sanitization. [Brand name] sanitizers are designed to kill bacteria, algae and other living organisms. [Brand Name] Sanitizers have built-in protection from the sun to maximize chlorine life.]

[STEP 2] [SHOCK-OXIDIZE]

[Shock Oxidizer]

[Weekly shock-oxidizing your pool eliminates odors, restores water clarity and reduces the demand on the sanitizer.]

[STEP 3] [ALGAE PREVENTION]

[ALGAECIDES]

[Algaecides add an extra layer of pool protection, while creating a more pleasant swimming environment. [Brand Name] algaecides safeguard your pool, preventing all types of algae.]

[BALANCE][BALANCERS] [Properly balanced water prevents corrosion and staining. It will also optimize the performance of your sanitizer. Using [Brand Name] balancers, as needed, simplifies the balancing act to help achieve properly balanced water.]

[SUPPLEMENT] [SUPPLEMENTS]

[Prevent specific water problems with [Brand Name] supplements. The perfect complement to your pool care regimen, [Brand Name] offers a variety of cleaners, clarifiers and stain removers.]

{End of marketing statements}

Active Ingredient:

1-Bromo-3-chloro-5, 5-dimethylhydantoin:.....96%

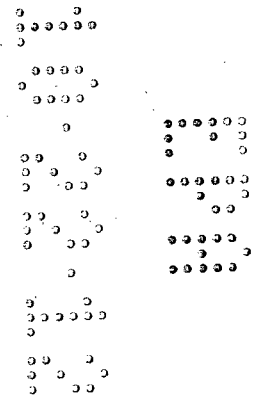
Other Ingredients:4%

Total:..... 100%

KEEP OUT OF REACH OF CHILDREN
DANGER

See first aid and precautions on side panel

NET WT. XXX LBS. (XXX kg)



{side/back panel}

FIRST AID

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 clothing: 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 swallowed: Call poison control center, or doctor immediately for treatment advice. Have 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 inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably 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.

IN CASE OF MEDICAL EMERGENCY, CALL 1-800-255-3924

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: CORROSIVE. Causes irreversible eye damage and skin burns. Harmful if swallowed. Do not get in eyes, on skin or clothing. Wear protective eyewear (goggles, face shield or safety glasses). Wear protective clothing and rubber gloves when handling this product. Avoid breathing dust and fumes. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

{for all package sizes under 50 lbs.}

ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish and aquatic organisms.

{for all package sizes 50 lbs. and over}

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollution 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. **PHYSICAL AND CHEMICAL HAZARDS:** Strong Oxidizing Agent. Do not mix with other chemicals. Mix only with water. Never add water to product. Always add product to large quantities of 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 will start a chemical reaction and generate heat, hazardous gas, possible fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well ventilated area. Flood with large volumes of water.

SWIMMING POOL SANITIZER: This product, when used as directed, is effective as a swimming pool water sanitizer and disinfectant.

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

Ensure all pool equipment is working properly. Backwash the filter system following manufacturer's instructions. Adjust pH to between 7.2 -7.6. When using other products as outlined in directions for this product, always follow directions on those products.

A bromine or chlorine residual of 1-2 ppm must first be established in the pool. If the residual is established with this product in a brominator, use the brominator at the highest feed rate following manufacturer's recommendations. When the bromine residual reaches 1-2 ppm, adjust the feeder accordingly. To maintain bromine residual, adjust the brominator feed rate to assure a constant treatment level of 1-3 ppm in residential pools and 3-5 ppm in commercial pools. Regular use of a test kit or test strips is necessary to maintain a bromine residual in the pool water.

Reentry into treated pools is prohibited above levels of 8 ppm bromine due to risk of bodily injury.

{THIS STORAGE AND DISPOSAL SECTION PREAPPROVED BY JEANNE KASAI 4-7-10}

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STORAGE AND DISPOSAL: {Optional statements – usage depends on whether or not product is packaged for household/residential, Non-household/residential use or single-use, non-resealable package.}

{Nonrefillable container - household/residential use}

[STORAGE: Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame.

DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. Do not contaminate water, food or feed by storage or disposal or cleaning of equipment. **FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY HANDLING.]**

{Nonrefillable container - non-household/residential use}

[STORAGE: Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame. Do not contaminate water, food or feed by storage or disposal or cleaning of equipment.

DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Rinse empty container thoroughly with water to dissolve all material prior to disposal.

FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY HANDLING.]

EMERGENCY HANDLING: In case of contamination or decomposition – Do not reseal container. Immediately remove container to an open and well-ventilated outdoor area by itself. Flood with large amounts of water. Dispose of the container and any remaining contaminated material in an approved landfill area.

NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.

[Each tablet weighs approximately 20 grams.]

EPA Reg. No. 42177-74

Manufactured for:
Alliance Trading, Inc.
109 Northpark Blvd. 4th Floor
Covington, LA. 70433

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