

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

April 22, 2005

Robert Rosenwasser
Agent for Alliance Trading, Inc.
09 Northpark Blvd, 4th Floor
Covington, LA 70433

Subject: Regal Brom-A-Gard Tablets 1" For Spas and Hot Tubs
EPA Registration No. 42177-75
Application Date: March 7, 2005
Receipt Date: March 24, 2005

Dear Mr. Rosenwasser:

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 "EZ Clor Bromagen For Spas and Hot Tubs"

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

CONCURRENCES

SYMBOL	7510C	7510C						
SURNAME	E. Berg	Mitchell						
DATE	4/22/05	4-22-05						



SCP Pool Corporation

March 7, 2005

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1801 S. Bell St.
Arlington, VA 22202-4501

Attention: E. Mitchell PM-32 (7510C)

**RE: Regal Brom-A-Gard Tablets 1" For Spas and Hot Tubs (EPA Reg. No. 42177-75)
OPP# 300861**

NOTIFICATION OF ADDITION OF ALTERNATE BRAND NAMES PER PR NOTICE 98-10

Alliance Trading, Inc., 109 Northpark Blvd., 4th Floor, Covington, LA 70433 is submitting this notification to **add one alternate brand name** to our **Regal Brom-A-Gard Tablets 1" For Spas and Hot Tubs (EPA Reg. No. 42177-75)** registration.

The name of this alternate brand is:

- **EZ Clor Bromagen For Spas and Hot Tubs**

"This notice 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 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."

Please find enclosed:

- An application form that includes the required notification language.
- One copy of the label with the alternate brand name.

If you need additional information, please feel free to call me at (215) 715-6419.

Sincerely yours,

Robert Rosenwasser
Agent for Alliance Trading, Inc.



	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number 300861
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Application for Pesticide - Section I

1. Company/Product Number 42177-75	2. EPA Product Manager E. Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Regal Brom A-Gard Tablets 1" for Spas and Hot Tubs	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

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

"Notification of Addition of Alternate Brand Names per PR Notice 98-10."

"This notice 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 98-10 and 40 CFR 152.46, this product may be in violation 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 If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	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) _____
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* Certification must be submitted

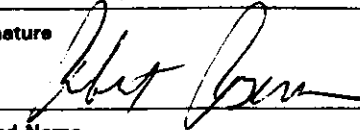
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> _____
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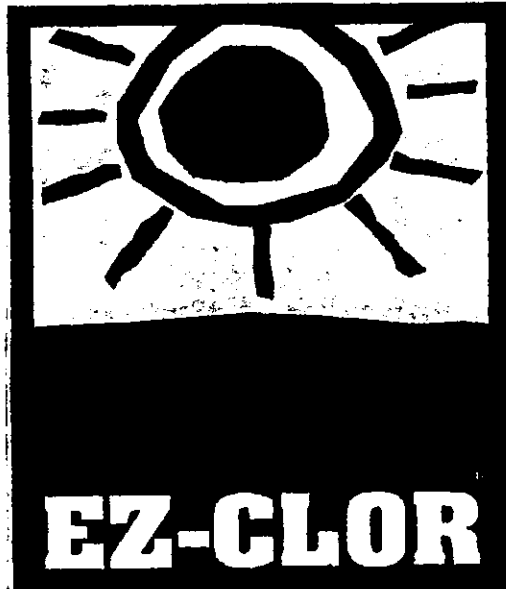
6. Manner in Which Label is Affixed to Product
 Lithograph Other _____
 Paper glued Stenciled

Section - IV

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

Name Robert Rosenwasser	Title Agent for Alliance Trading, Inc.	Telephone No. (Include Area Code) 215-715-6419
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<p style="text-align: center;">Certification</p> <p>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.</p>	6. Date Application Received (Stamped)	
2. Signature 	3. Title Agent for Alliance Trading, Inc.	
4. Printed Name Robert Rosenwasser	5. Date March 7, 2005	



EZ-CLOR

BROMAGEN

For Spas and Hot Tubs

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 WEIGHT: 5 lbs (2.27 kg.)

**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. Irritating to nose and throat. Avoid breathing dust and fumes. Remove and wash contaminated clothing and wash before reuse.

FIRST AID	
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, preferably by mouth-to-mouth, if possible. ● Call a poison control center or doctor for further treatment advice.
If swallowed	<ul style="list-style-type: none"> ● 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.
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	

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms.

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.

SPA AND HOT TUB SANITIZER:

When used as directed, this product is effective as a spa and hot tub 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 spa 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.

Fill spa bromine feeder with this product and adjust feeder following manufacturer's directions to yield bromine residual between 2-4 ppm in residential spas and 4-6 ppm in commercial spas. Check feeder regularly and add additional product as needed to maintain the bromine residual. The pump and filter should be operated for at least 3 hours every day whether the

spa is used or not. Do not heat water above 102°F. Keep the spa free of leaves and other debris. To maintain clear, clean water and insure the performance of your spa chemicals, spas should be drained and refilled with fresh water every 60 days residential or a minimum of every 7 days in commercial spas.

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

STORAGE AND DISPOSAL

Keep this product dry in original 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 area with large volumes of water to dissolve all material before discarding this container. Do not contaminate food or feed by storage or disposal.

CONTAINER DISPOSAL: Do not reuse container, but place in trash collection. Rinse thoroughly before discarding in trash.

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

Each tablet weighs approximately 20 grams.

Manufactured for:

**Alliance Trading, Inc.
109 Northpark Blvd, 4th Floor
Covington, LA 70433**

EPA Reg. No. 42177-75

EPA Est. No. 5185-MI-1