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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

APR 17 2008

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Heather R. Bjornson, Agent for King Technology, Inc.  
Technology Sciences Group Inc.  
1150 18<sup>th</sup> Street N.W. Suite 1000  
Washington D.C. 20036

Subject: Application for Amendment dated November 16, 2007  
Spa Bromine Disinfectant  
EPA Reg. No.: 53735-10

Dear Ms. Bjornson:

The Agency has reviewed your amendment submitted in accordance with continuing registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended, and determined the action acceptable with the following comments:

- On page 2 delete "sanitizer and" as marked;
- On page 3 change "sanitizer" with "disinfectant" as marked;
- On page 3 change "insure" to "ensure" as marked; and,
- On page 4, correct the spelling of manufacturer's as indicated.

A copy of your label is enclosed. In summary, your request to revise the Spa treatment language to be identical in target levels to that of your other product, Pool Frog Mineral Reservoir, has been reviewed and verified by product specific efficacy data. The data you cited, has been reviewed and the review is enclosed.

Please submit a finished copy of your label for our files. Should you have any questions concerning this letter, please contact Tom Luminello at (703) 308-8075.

Sincerely,

Emily H. Mitchell, Product Manager 32  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Enclosures: D348081

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{All text in brackets [xxx] is optional and may or may not be included on a final label.}  
{All text in braces {xxx} is administrative and will not appear on a final label.}

[Alternate Brand Name: Spa Frog Bromine Cartridge]

**{MASTER LABEL}**

**SPA BROMINE DISINFECTANT  
Prefilled Bromine [Spa] Sanitizer**

Active Ingredient:

1-Bromo-3-Chloro-5, 5-Dimethylhydantoin.....96.0%

Other Ingredients:..... 4.0%

Total: .....100.0%

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

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**Keep Out of Reach of Children**

**DANGER**

**SEE FIRST AID AND PRECAUTIONARY  
STATEMENTS ON BACK PANELS**

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EPA Reg. No.:	53735-10
EPA Est. No.:	71209-AZ-001
Manufactured By:	King Technology, Inc. 530 11 <sup>th</sup> Avenue South Hopkins, MN 55343
Net Wt.:	[150 grams] [200 grams]

**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 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 advise. 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. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

**IN CASE OF MEDICAL EMERGENCY CALL 1-800-424-9300.**

**Product Description: {Canister}** When used as directed SPA BROMINE DISINFECTANT is effective as a residential spa and hot tub water sanitizer and disinfectant.

*delete*

**Directions For Use: {Canister}**

It is a violation of federal law to use this product in a manner inconsistent with it's labeling. Read entire label to use strictly in accordance with precautionary statements and directions.

Ensure all spa equipment is working properly. Clean filter following manufacturer's directions. Adjust pH between 7.2 – 7.8 and total alkalinity to 60 – 120 ppm. When using other products as outlined in directions for this product, always follow directions on those products.

Place this product in spa and let it float freely in spa or hot tub. Under normal use conditions, use one dispenser per 350 gallons of spa or hot tub water. However, under heavy bather loading or reduced water circulation, additional dispensers may be used to maintain constant active bromine residuals of 2-4 ppm in residential spas or hot tubs. To increase the bromine residual, turn the rotating cap to a higher number located in the flow indicator window. To decrease the bromine residual, turn the rotating cap to a lower number in the flow indicator window.

To a freshly filled spa or hot tub, begin with an indicator setting of # 5. Check bromine residuals frequently. When 2-4 ppm bromine residual is obtained, lower the indicator setting to maintain constant recommended bromine residuals.

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The pump and filter should be operated for at least three hours a day. Keep the spa free of leaves and debris. Residential spas and hot tubs should be drained and filled with fresh water periodically. See your spa manufacturer's directions.

**Product Description: {Cartridge}** Use this SPA BROMINE DISINFECTANT Cartridge in either the Inline Spa System, the Floating Spa System or as a free-floating sanitizer. When the SPA BROMINE DISINFECTANT Cartridge is used as directed, spa care is easy and spa water is crystal clear and odor free.

*disinfect*

**Directions for Use: {Cartridge}** It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label to use strictly in accordance with precautionary statements and directions.

Ensure all spa equipment is working properly. The pump and filter should be operated for at least 3 hours per day. Clean filter following manufacturer's directions. Adjust pH to between 7.2 – 7.8 and total alkalinity to 60 – 120 ppm. When using other products as outlined in directions for this product, always follow directions on those products. [Keep the spa free of leaves and debris.

{One of the following statements will appear on the label}  
[Residential spas and hot tubs should be drained and filled with fresh water periodically. See your spa manufacturer's directions.] [To maintain clear, clean water and ~~insure~~ performance of your spa or hot tub chemicals, water should be drained and spa or hot tub refilled with fresh water periodically or as per spa manufacturer's instructions.] [Residential spas and hot tubs should be drained and refilled with fresh water every 60 days or as per spa manufacturer's instructions.]

*ensure*

**Before using Cartridge:** With a freshly filled spa establish a bromine or chlorine residual of 1.0-2.0 ppm in the spa with an EPA approved spa shock or by other means by following directions of that product before using cartridges.

**Using the In-line Mineral Spa System:** For the first 24 hours, set the SPA BROMINE DISINFECTANT Cartridge at #3 by holding the bottom and turning the top until the number 3 appears in the setting window. To install: open cap of Inline System, push down and turn cartridge holder counter-clockwise to unlock. Pull holder out. Snap cartridge into "Bromine Only" section. Make sure to line up indent on cartridge with raised line on holder. After cartridge is snapped in, replace holder by lining up arrow on holder with arrow on system lip, push down and lock in place. Replace cap. When using as directed with the Spa Frog Mineral Cartridge, maintain at least a 1.0 ppm bromine level. Otherwise maintain a 2.0 – 4.0 ppm bromine level. Initially monitor daily by removing and adjusting the cartridge depending on spa size and use until desired bromine level is achieved.

**Using the Floating Mineral Spa System:** For the first 24 hours, set the SPA BROMINE DISINFECTANT Cartridge at #5 by holding the bottom and turning the top until the number 5 appears in the setting window. To install: push the cartridge into the bottom opening of the Floating Spa System. Set entire system in the spa water. When

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using as directed with the Spa Frog Mineral Cartridge, maintain at least a 1.0 ppm bromine level. Otherwise maintain a 2.0 – 4.0 ppm bromine level. Initially monitor daily by removing and adjusting the cartridge depending on spa size and use until desired bromine level is achieved.

**Using as a Free Floating Sanitizer:** Set cartridge as described for the Floating Spa System and allow to free float in spa. When using it with a Spa Frog mineral product, maintain at least a 1.0 ppm bromine level. When using it as a stand alone disinfectant, maintain a 2.0 – 4.0 ppm bromine level.

**FOR ALL USES:** Adjusting to a higher setting will increase the bromine output while a lower setting will decrease it. When empty follow disposal instructions and replace with a new Spa Bromine Disinfectant Cartridge.

**REENTRY into treated spas is prohibited above levels of 5 ppm available bromine as measured by a suitable test kit due to risk of bodily injury.**

{Optional language for 200-gram cartridge}

[For in-Line System Use Only]

[Use this Spa Bromine Disinfectant Cartridge in the In-line Spa System only.]  
[DO NOT use this cartridge with the Floating Spa System.]

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

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[Lasts Longer\*]

[33% More\*]

[33% More Bromine\*]

[Bromine Lasts Longer\*]

[33% More Bromine Lasts Longer\*]

[\*compared to the 150 gram Spa Bromine Disinfectant]

**Product Description: {Evaporative Cooler}.** When used as directed, this product effectively controls algal, bacterial and fungal slimes in evaporative coolers.

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**Directions for Use: {Evaporative Cooler}** It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label to use strictly in accordance with precautionary statements and directions.

Shut off water to evaporative cooler. Secure new Bromine Disinfectant Cartridge to water supply line leaving the preset output window at setting #1. Make sure the water supply is attached at the top of the Bromine Disinfectant Cartridge and that both water delivery lines are attached at the base of the container. Turn water on and ensure there are no leaks.

Maintain a 1-3 ppm bromine residual for at least four hours treatment. Repeat throughout the cooling season. A new Bromine Disinfectant Cartridge should be inserted at the beginning of the cooling season and replaced when empty thereafter. See Evaporative Cooler manufactures directions on adjusting amount of drainage water and water cycle times for the Evaporative Cooler.

manufacturers

**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. Moisture may decompose this product and cause a violent reaction leading to fire and explosion. In case of decomposition, isolate container if possible and flood area with large amounts of water to dissolve material before discarding this container. Do not contaminate food or feed by storage and disposal.

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

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**{Clear Child Resistant Outer Sleeve}****EASY DIRECTIONS: {Canister}**

- 1) Twist cap to setting #5.
- 2) Put chemical dispenser in spa water.
- 3) Test bromine residual frequently (approx. every 2 hours).
- 4) Upon achieving 2-4 ppm REDUCE TO MAINTENANCE SETTING #1-#2 for maximum longevity.

**TO ADJUST SETTING: {Canister}**

- 1) For ease of adjustment place in water.
- 2) Grip cap firmly in one hand.
- 3) With other hand, grip below windows firmly. (Fingers should grip only bottom of canister.)
- 4) Turn cap and outer sleeve in opposite directions.

**PRECAUTIONARY STATEMENTS:**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER:** Highly Corrosive. Causes eye and skin damage. May be fatal if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or safety glasses and rubber gloves when handling product. Irritating to nose and throat. Avoid breathing dust and fumes. Remove and wash contaminated clothing before reuse.

**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 and 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 area with large volumes of water.

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

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