



MAY 26 2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Milo Fortier, Manager Environmental Health & Safety
Haviland Consumer Products, Inc.
421 Ann Street
Grand Rapids, MI. 49504

Subject: Amendment dated March 1, 2010
Haviland Ultra Brom
EPA Registration No. 57787-32

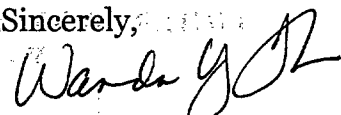
Dear Mr. Fortier:

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 conditions:

- Under Directions for Use, delete "disinfectant, and virucide". Your product only makes sanitizer claims.
- Under Swimming Pool and Spas and Hot Tubs directions add the following re-entry statements: "Do not re-enter swimming pool until bromine residual is 4 ppm or less as measured by a bromine test kit.
- Under Spas and Hot Tubs directions change "hot but" to "hot tub".
- Under precautionary statements change "Wash thoroughly with soap and water after handling" to read "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet."
- Under Environmental Hazards change "...other waters..." to read "...other public waters...".
- Under optional marketing statements change "[Kills Bacteria]" to "[Controls Bacteria]".
- Under optional marketing statements delete "Kills Germs" and "Virucide".

In summary, the new primary brand name and revised Storage and Disposal instructions are acceptable. You must provide a finished copy of your revised labeling for our file. If you have any questions concerning this letter, please contact Tom Luminello at (703) 308-8075.

Sincerely,



Wanda Y. Henson
Acting Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510-P)

MASTER LABEL

HAVILAND ULTRA BROM

[Bactericide] [Algicide]

ACTIVE INGREDIENT:

- Bromochloro-5, 5-Dimethylhydantoin.....98%
- OTHER INGREDIENTS.....2%
- TOTAL.....100%

Provides 64.9% available bromine, 29% available chlorine

KEEP OUT OF REACH OF CHILDREN

DANGER

Corrosive and strong oxidizer. See additional precautions on [back] [side] panel.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information call CHEMTREC at 1-800-424-9300.

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 a 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 a 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 mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Packaged By:
Haviland Consumer Products, Inc.
421 Ann Street N.W.
Grand Rapids, MI 49504

EPA Reg. No. 57787-32
EPA Est. No. 57787-MI-001
Net Contents: (see container label)
Batch Code # / Lot #: (see container label)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 26 2010

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

57787-32

4/7

MASTER LABEL

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

DANGER

Corrosive. Causes irreversible eye damage and skin burns. Eye contact may cause loss of vision. Irritating to nose and throat. May be fatal if inhaled. Harmful if absorbed through skin or swallowed. Keep container tightly closed when not in use. Use with adequate ventilation. Do not ship with foods, feeds, drums, or clothing. Do not smoke, drink, or eat when handling this product. Do not breathe dust or spray mist. Do not get in eyes, on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wear goggles with side-shields, face shield or safety glasses; protective clothing and rubber gloves. Wear a mask or pesticide respirator jointly approved by Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

and before eating, drinking, chewing gum, using tobacco, or using the toilet.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not contaminate water by cleaning of equipment or disposal of wastes. 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 the EPA.

Public

PHYSICAL OR CHEMICAL HAZARDS

Strong oxidizer, mix with water only. Reaction with combustible organic materials, bases, moisture or with oxidizers may generate heat, hazardous gases and, possible fire or explosion. Do not add to dispensers or other equipment that is not dry and clean of any chemical residues. Does not burn, but will decompose from about 320°F (160°C) releasing toxic gases. Do not break or crush tablets and avoid exposure to dust.

- Special Precautions, please read before opening container. Misuse may result in serious personal injury requiring hospitalization. Related complications may lead to death.

Prevention of Physical Injury: This product emits a powerful bromine gas. Open container outdoors, or if opening indoors, open in a well ventilated area, away from other chemicals. Hold away from face when opening to avoid breathing fumes. Mixing with other chemicals may cause a violent and instantaneous chemical reaction. Do not add this product to water in a pail. Do not add water to this product in a pail. Follow label instructions exactly. Do not experiment.

Prevention of Property Damage: When undissolved, contact between this product and vinyl liners, painted surfaces or other property in or around the [pool] [spa] will result in permanent bleaching of the color.

in EPA Letter Date: 5/20/07

MAY 26 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for use as a pesticide, registered under EPA Reg. No. 50000-00

MASTER LABEL

Note to reviewer: Package label will show either swimming pool use directions, spa use directions, or both.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

{Marketing Statement}

Use of [this product] will help to keep your [pool] [spa] or [hot tub] sparkling clean and inviting. [This product] is an effective [non-chlorine] [pool] [spa] or [hot tub] water sanitizer, ~~disinfectant, and virucide.~~ [This product] is effective in a wide pH range and is low in odor. [[This product] is best used in a spa with a floating bromine [dispenser] or [floater] or [feeder].]

delete

Note to reviewer: The following paragraph, {Optional Marketing Statement}, can be used on label brands that are marketed for easy product identification by the consumer.

{Optional Marketing Statement}

[There are three important steps to follow to maintain sparkling clean water in your [pool] [spa] or [hot tub:]

- [Step 1 – Add SANITIZER to control bacteria.]
- [Step 2 – Add SHOCK to destroy contaminants.]
- [Step 3 – Add ALGAECIDE to prevent algae before it starts.]

[All three steps are vital to achieve sparkling clean water.]

Sanitizer for Swimming Pools: When using other products in conjunction with this product, follow the instructions on those products. NEVER mix different products together in the same bottle, pail, or similar container. Adjust pH of pool water to the range of 7.2–7.6. When initially feeding [this product] into the pool establish a bromine residual of 2–4 ppm. If a bromine feeder or brominator is being used to establish bromine residual, start by increasing the brominator to the highest setting or feed rate, according to the manufacturer’s instructions. Once there is a residual of 2–4 ppm of bromine reduce the setting of the brominator to deliver a consistent level of bromine to the water. To maintain bromine residual adjust the brominator setting to deliver a consistent feed of bromine to the water. Test water frequently using testing strips or a test kit to ensure proper sanitizer levels.

Do not re-enter swimming pool until bromine residual is 4 ppm or less as determined by a bromine test kit.

Sanitizer for Spas and Hot Tubs: When using other products in conjunction with this product, follow the instructions on those products. NEVER mix different products together in the same bottle, pail, or similar container. Adjust pH of spa water to the range of 7.2–7.6. If spa is freshly filled and before initially using [this product] in your spa or ~~hot tub~~ add [Brom Bank] or [sodium bromide], according to label instructions. Fill bromine feeder and adjust the dispensing levels, according to the manufacturer’s instructions, to introduce a bromine residual of 2–4 ppm. Check feeder regularly and ensure that [this product] is continuously introducing bromine into the water. When empty or when levels are low, add additional [this product] as necessary to maintain bromine residual. To ensure sparkling clean water and that you spa chemicals work effectively, water in [residential] spas should be emptied and refilled with fresh water every 60–90 days. Commercial spas should have the water changed every 3 to 5 days.

hot tub

Do not re-enter spa or hot tub until bromine residual is 4 ppm or less as determined by a bromine test kit.

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MASTER LABEL

[Pool] [Spa] Gallon Calculator (all dimensions in feet)

Square or Rectangular: Length x Width x Average depth x 7.5 = Gallons

Round or Oval: Length x Width x Average depth x 5.9 = Gallons

Each Tablet weighs 0.70 oz. (19.8 grams)

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Keep this product dry in the tightly closed, original container when not in use. Store in dark, cool [below 86°F (30°C)], dry, well-ventilated area. Keep product away from energy sources, combustible organic materials, oxidizers, strong bases, and moisture.

Pesticide Disposal: Pesticide wastes may be 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: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse (or equivalent) promptly after emptying.

Spills: When handling or dealing with spills, use impact-resistant goggles with side shields, or face shield, body-covering clothes, including impervious rubber or plastic gloves and boots; use a dust respirator if dusting occurs. Sweep up dry spills and dispose of as described for pesticide disposal. If drum contents are contaminated or decomposing, do not reseal container; isolate unsealed drum in the open or in a well ventilated area; flood with large volumes of water if necessary.

In Case of Fire: Do not use ammonium phosphate extinguisher near water and this product. Hazardous reactions may occur.

ACCEPTED
with COMMENTS
Registration Date:

MAY 26 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
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57787-32

MASTER LABEL

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

Optional marketing statements that may be used on the front panel of the label for [swimming pool] or [spa] applications:

- [1" Tablets]
- [1" Tablets of Use in Brominators]
- [1" Tablets for Use in Floating Feeders]
- [Algaecide]
- [For Pools and Spas]
- [For Pools, Spas, and Hot Tubs]
- [For Spas]
- [For Spas and Hot Tubs]
- [Fungicide]
- [Ideal for Indoor Pools]
- ~~[Kills Bacteria]~~ [Controls bacteria]
- ~~[Kills Germs]~~ delete
- [Low Odor]
- [No Chlorine Odor]
- [Non-Chlorine]
- [Sanitizer]
- [Slow Dissolving Brominating Tablets for Pools]
- [Slow Dissolving Brominating Tablets for Pools and Spas]
- [Slow Dissolving Brominating Tablets for Spas]
- [Slow Dissolving Tabs]
- [Step 1] *Sanitizers are marketed as step 1 of a three step program to treat swimming pool and spa water to allow easy product identification by consumers. This marketing word is closely associated with the {Optional Marketing Statement} located on page 3 under "Directions for Use".*
- ~~[Virucide]~~ delete
- [Works Well in Hot Water]
- [Works Well in Wide pH Range]

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 WITH COMMENTS
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