



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 16, 2011

Olivia D. Laird
Agent for Aqua Clor S.A. De C.V.
Laird's Regulatory Consultants, Inc.
17804 Braemar Place, Leesburg, VA 20175

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: AQ 90 Tablets
EPA Reg.#: 65723-1
Application Date: October 20, 2011
Receipt Date: October 26, 2011

Dear Ms. Laird:

This acknowledges the receipt of your letter of October 20, 2011 in response to the Agency's initiated letters dated August 20, 2010 and July 14, 2011, regarding the label Notification for AQ 90 Tablets (EPA Reg# 65723-1).

Proposed Notification:

A response to address EPA letters noted above, the revised submitted label (pin punched 10/26/2011) with the requested changes regarding "AQ 90 Tablets" product label (EPA Reg# 65723-1) is acceptable with comments as follows:

1. Add below the Brand Name, what the product is used for, to read "**FOR MANUFACTURING USE ONLY**".
2. - Revised and update the "**Storage & Disposal**" statement as follows:
(See 40 CFR 156.140, 40 CFR 156.144, 40 CFR 156.146, 40 CFR 156.156, 40 CFR 156.10, and 40 CFR 156.60(b); PR Notice 83.3, PR Notice 84.1 and summarized in PR Notice 2007-4 of October 29, 2007 (Revised: April 29, 2008) and various citation therein.)

"STORAGE AND DISPOSAL"

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

A. [Subheading] Pesticide Storage: Keep product dry in tightly closed original container when not in use. Store in cool, dry, well ventilated area away from heat, open flames, organic chemicals and sunlight. Do not allow water to get into container. Do not store with easily oxidizable materials, acids, or reducers. In case of spill, isolate container (if possible) and flood area with large amounts of water to dissolve all material before discarding this container in trash.
Emergency Handling: In case of contamination or decomposition, do not reseal container. Isolate in open, well-ventilated area. Cool unopened container in vicinity of water spray. Flood area with large quantities of water, if necessary, before discarding the container.

B. [Subheading] Pesticide Disposal: Pesticide wastes are acutely hazardous and must be disposed in accordance with applicable Federal and State regulations. Pesticide wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility as per label instructions. 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 EPA Regional Office for guidance.

C. [Subheading] Container Handling and Disposal [For Commercial/Industrial/Institutional Products] [Separate statement for supersack/bag if applicable]

a. [For Supersack/bag container if applicable]

Container Handling/supersack: Non-refillable supersack. Do not re-use or refill this supersack. Completely empty bag into application equipment. Then offer for recycling, or dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay away of smoke.

[For liner/bag in pail and drums if applicable]

Container Handling: Non-refillable container. Do not re-use or refill this container. "Completely empty liner/bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. When completely empty offer for recycling, if available or dispose of liner/bag and container in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke."

b. [For rigid non-refillable container (drum) with liner greater than 5 gallons]

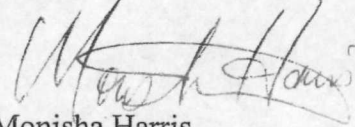
Container Handling: Non-refillable rigid container. Do not re-use or refill this container. "Completely empty liner by shaking and tapping side and bottom to loosen clinging particles. Empty residue into application equipment". Throw liner in trash. Triple rinse container/drum (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip containers on its end and tip it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for the later use or disposal. Repeat this procedure two more times. Then offer container/drum for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay away of smoke.

General Comments:

Submit one copy of your final revised printed labeling before distributing or selling the product bearing the revised labeling. This submission will be acceptable when all of the deficiencies outlined above have been addressed and corrected.

If you have any questions on this letter, please contact David Liem by email at liem.david@epa.gov or call at 703-305-1284.

Sincerely,



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



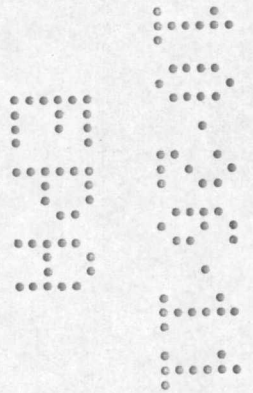
Laird's Reg. Consultants, Inc.

Pesticide Specialists
Shenstone Estates
17804 Braemar Place
Leesburg, VA 20175-7046
Tel: 703-669-0509
Fax: 703-669-4608
Laird1olivia@aol.com

October 20, 2011

Ms. Monisha Harris, PM Team 32
Environmental Protection Agency
Regulatory Management Branch II
Antimicrobial Division (7510P)
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

SUBJECT: AQ 90 Tablets
EPA Reg. No. 65723-1
In response to EPA Letters dated: Aug -20 2010 and Jul -14 2011



Dear Ms. Henson:

In response to your letter that is referenced above, please find attached:

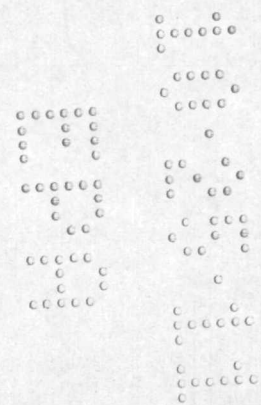
1. Cover Letter
2. EPA Letter dated Aug -20 2010
3. EPA Letter dated Jul -14 2011
4. Copy of label sent on Jul -14 2011
5. Two (2) copies of the revised label with the requested changes.

Should you have any questions please let me know.

Sincerely,

Olivia D. Laird

President/Agent



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AQUA-CLOR AQ 90 TABLET



TRICHLOROISOCIANURIC
ACID, DRY
UN 2468

EPA REG. No. 65723-1
EPA EST. No. 65723 MX-1

PACKAGED BY: AQUA CLOR S.A. DE C.V.
BRUSELAS 805 COL. MIRADOR MONTERREY N.L.
C.P. 64070, MEXICO
EMERGENCY PHONE (213) 562-9500

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT	Trichloro-s-Triazinetrione	99%
INERT INGREDIENTS		1%
TOTAL		100%
Available Chlorine 90%		

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID STATEMENTS

<p>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.</p>
<p>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.</p>
<p>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 treatment advice.</p>
<p>IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person to 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.</p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency, call the National Pesticide Telecommunications Network at 1 (800)858-7378.</p> <p>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage</p>

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Harmful if absorbed through skin. May be fatal if inhaled. Do not breathe dust or spray mists. 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, using tobacco, or going to the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL PRECAUTIONS: Do not contaminate streams, rivers, or other bodies of water. Do not discharge into drains, gutters, or storm sewers. Do not apply to the surface of water. Do not apply to areas where runoff may occur. Do not apply to areas where runoff may occur. Do not apply to areas where runoff may occur.

REMOVAL AND DISPOSAL: Do not reuse. Do not reuse. Do not reuse.

STORAGE: Store in a cool, dry place. Store in a cool, dry place. Store in a cool, dry place.

LR AQ 90

TABLETS

NET WEIGHT:

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT	Trichloro-s-Triazinetrione	99%
INERT INGREDIENTS		1%
OTA		100%
Available Chlorine	90%	

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID STATEMENTS

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.
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IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person to 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.
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ENVIRONMENTAL HAZARD: 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 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.

PHYSICAL AND CHEMICAL HAZARDS: STRONG OXIDIZING AGENT. Mix only with water. Use clean, dry utensils. Do not add this product to any 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, hazardous gases, and possible generation of 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, if necessary.

DIRECTION FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For repackaging or formulating as a microbicide/ microbiostat, disinfectant, bactericide, sanitizer, fungicide, or algacide into end-use products for the following general sites: aquatic non-food industrial, aquatic non-food residential, indoor food, indoor non-food, indoor residential and drinking water.

Repackagers and formulators must require their own registration number to legally distribute this chemical for such use.

STORAGE AND DISPOSAL: Keep product dry in tightly closed original container when not in use. Store in cool, dry, well ventilated area away from heat, open flames, organic chemicals and sunlight. Rinse empty container thoroughly with water and discard in trash. Waste resulting from the use of this product can be disposed of on site or at an approved waste disposal site. Do not reuse empty container. 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.

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N.L.