

65723-6

12/08/2011

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

December 8, 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

FILE COPY

Subject: AQ 90 Granular
EPA Reg.#: 65723-6
Application Date: December 1, 2011
Receipt Date: December 8, 2011

Dear Ms. Laird:

This acknowledges the receipt of your letter of December 1, 2011 in response to the Agency's initiated letters dated November 22, 2011 and an email dated December 1, 2011, regarding the label Notification for AQ 90 Granular (EPA Reg# 65723-6).

Proposed Notification:

A response to address EPA letters noted above, the revised submitted label (pin punched 12/8/2011) with the requested changes regarding "AQ 90 Granular" product label (EPA Reg# 65723-6), namely the Storage and Disposal statement is acceptable with a comment as follows:

General Comments:

On page 2 correct typo "Stat4" to read "State".

Submit one copy of your final revised printed labeling before distributing or selling the product bearing the revised labeling.

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,

A handwritten signature in black ink, appearing to read "Monisha Harris".

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

Laird's Regulatory Consultants, Inc.

Over 32 years of EPA, FDA, & State Pesticide Product Regulation & Consultation

December 1, 2011

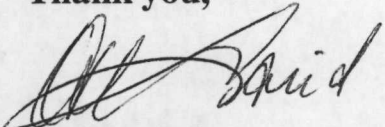
Ms. Monisha Harris, PM Team 32
Environmental Protection Agency
Regulatory Management Branch II
Antimicrobial Division (7510P)
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

SUBJECT: AQ 90 Granular
EPA REG. NO. 65723-6
Your letter dated November 22, 2011

Dear Ms. Harris:

In response to your letter referenced above please find attached hereto, two (2) copies of the revised final printed label incorporating the reviewer's recommended/specified revisions for placement in the file for this product. We have also incorporated the changes on this label that were recommended in the letter of November 16th for 65723-1 by David Liem, see a copy of the Email attached.

Thank you,



Olivia D. Laird
President/Agent

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AQUA-CLOR

AQ 90

GRANULAR

FOR MANUFACTURING USE ONLY

NOTIFICATION
Date Reviewed: 12/8/2011
Reviewed By: *Mirador*



TRICHLOROISOCYANURIC
ACID, DRY
UN 2468

EPA REG. No. 65723-6
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

ACTIVE INGREDIENT

Trichloro-s-Triazinetrione

INERT INGREDIENTS

TOTAL

Available Chlorine 90%

99%
1%
100%

**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.

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 mouth-to-mouth if possible. 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 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.

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.

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Highly 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 chewing gum using tobacco or using the restroom. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARD: Do not discharge into streams, ponds, estuaries with the requirements of System (NPDES) permit or writing prior to discharge systems without previous authority. For guidance of the EPA.

PHYSICAL AND CHEMICAL: Use only with water. Use clec device containing remnant violent reaction leading moisture, organic matter with generation of heat, and explosion. In case of container. If possible, isolate Flood with large volumes

DIRECTIONS FOR USE: In a manner inconsistent with a microbiocide/ fungicide, or algicide sites: aquatic non-food food, indoor non-food Reformulators and repack registration from the Envii

STORAGE AND DISPOSAL: Do not contaminate water, Keep product dry in tightly cool, dry, well ventilated and sunlight. Do not allow easily oxidizable materials, (if possible) and flood area before discarding this container. **EMERGENCY HANDLING:** In resealed container. Isolate container in vicinity of water if necessary, before discard

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R A Q 90

GRANULAR
FOR MANUFACTURING USE ONLY

NET WEIGHT:

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

Available Chlorine 90%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

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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 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 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.

DIRECTIONS 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. Reformulators and repackagers of this product must obtain their own registration from the Environmental Protection Agency.

STORAGE AND DISPOSAL:

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

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.

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

[For supersack/bag/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 out of smoke.

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

Container Handling: Non-refillable container. Do not reuse or refill this container. Completely empty bag 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.

[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 closure. Tip container 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 of 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 out of smoke.

