



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 13 2004

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mark Visconti
Alden Leeds, Inc.
55 Jacobus Ave.
South Kearny, N.J. 07032

SUBJECT: June 22, 2004 amendment application
EPA Registration Number 66397-1
Aqua Basics Brominating Tablets for Pools and Spas

Dear Mr. Visconti:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comment(s) and conditions listed below.

- Under First Aid, the treatment recommendations must be listed in the following order: If In Eyes, If In Skin, If Swallowed, If Inhaled.
- Under active ingredients change spelling of second chemical to 1,3-dibromo-5-dimethylhydantoin.
- Under Disinfecting Spas and Hot Tubs, add in bold type to bottom of directions:
Proper sanitary practices require changing spa water at a minimum of very 30 days.

A copy of your conditionally accepted stamped label is enclosed. If you have any questions regarding this letter, please call Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Emily H. Mitchell".

Emily H. Mitchell
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510-C)

PRECAUTIONARY STATEMENTS
DANGERS TO HUMANS
AND DOMESTIC ANIMALS
DANGER

HARMFUL OR FATAL IF SWALLOWED.
HIGHLY CORROSIVE. DO NOT TAKE INTERNALLY. Causes eye and skin damage. Irritating to nose and throat. Avoid breathing dust. Use with adequate ventilation. Do not get into eyes, on skin or clothing. Wear rubber gloves, chemical goggles and face shield when handling. Wash thoroughly after handling. Immediately remove contaminated clothing and wash before reuse.

FIRST AID:

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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 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 further treatment advice.

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.

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

ENVIRONMENTAL HAZARDS

This product 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. 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.

PHYSICAL AND CHEMICAL HAZARDS

CHEMICAL HAZARDS: STRONG OXIDIZING AGENT. Mix only with 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 may start a chemical reaction with generation of heat, liberation of 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.

STORAGE AND DISPOSAL

STORAGE: Keep container tightly closed. Store in a dry place. Do not store at elevated temperatures.

DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous and/or toxic. 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 the label instructions, contact your state pesticide or environmental control agent or the hazardous waste representative at the nearest EPA regional office for guidance.

METAL AND PLASTIC CONTAINERS: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate or burn if allowed by State and local authority. If burned, stay out of smoke.

DIRECTIONS FOR USE

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

RECIRCULATING COOLING WATER SYSTEMS

This product aids in the control of bacterial, fungal and algal slimes in recirculating cooling water systems servicing heat exchangers, evaporative condensers and other equipment requiring cooling. It is also effective in controlling various micro biological growth formations in influent systems such as lagoons or flow-through filter systems, industrial wet scrubber systems, air washers equipped with mist eliminators, and brewery pasteurizers. This product may be added to the systems either continuously or intermittently or as needed. The frequency of feeding and duration of the treatment will depend upon the severity of the problem. Badly fouled systems must be cleaned before treatment is begun.

FOR CONTROL OF BACTERIA AND FUNGI

INTERMITTENT OR SLUG METHOD

INITIAL DOSE. When the system is noticeably fouled add 0.1 to 1.0 lbs. to 1000 gallons of the water in the system. Repeat until control is achieved.
SUBSEQUENT DOSE. When microbial control is evident add 0.1 to 0.75 pounds to 1000 gals. of water in the system every 3 days or as needed to maintain control.

CONTINUOUS FEED METHOD

INITIAL DOSE. When a system is noticeably fouled, add 0.1 to 1.0 pound

to 1000 gals. of water in the system.
SUBSEQUENT DOSE. Continuously feed at the rate of 0.1 to 0.75 pounds to 1000 gals. of system water.

FOR CONTROL OF ALGAE INTERMITTENT OR SLUG METHOD

INITIAL DOSE. When the system is noticeably fouled add 0.1 to 1.0 pound per 1000 gallons of water in the system. Repeat until control is achieved.
SUBSEQUENT DOSE. When algae control is evident add 0.1 to 0.75 pound to 1000 gallons daily or as needed to maintain control.

CONTINUOUS FEED METHOD

INITIAL DOSE. When the system is noticeably fouled add 0.1 to 1.0 pound to 1000 gallons of water in the system. Repeat until control is achieved.
SUBSEQUENT DOSE. Continuously feed at a rate of 0.1 to 0.75 pounds per day per 1000 gallons of system water.

DISINFECTING SPAS AND HOT TUBS

NOTE: Before using this product in your spa or hot tub for the first time, add 1/2 ounce of sodium bromide per 100 gallons of water to establish a 30 ppm bromine reserve. Also, add sodium bromide whenever the spa or hot tub is drained and refilled. The bromine reserve is needed to keep the system completely bromine based, to eliminate chlorinous odors and to assure maximum water comfort to skin and eyes in spas or hot tubs on this products treatment system. To start up a new spa, or one recently drained clean all surfaces, backwash or clean the filter, chemically balance the calcium hardness and total alkalinity, treat for iron, copper and manganese, if present and adjust the pH to 7.4 - 7.6.

prior to initiating treatment with this product. Add Sodium Bromide as described above. Place this product in a suitable feeder. Adjust the feeder according to the manufacturers directions to maintain an active bromine level of 2-4 ppm in residential spas and 3-6 ppm in commercial spas. Use a reliable test kit for free bromine measurements.

Superoxidation: Water soluble, non-filterable wastes can accumulate in spa or hot tub water and cause dull or cloudy water and can stimulate algal growth. Superoxidation or superchlorination with a suitable oxidizing shock treatment should be done on a regular basis to remove these wastes and maintain clear, sparkling water. Suitable oxidizing agents are those based on calcium hypochlorite, lithium hypochlorite, sodium hypochlorite or potassium peroxymonopersulfate.

DANGER: Do not mix this product in concentrated form with any other chemicals. Do not add other chemicals to the feeding device when using this product. A violent reaction leading to fire and/or explosion could result.

DISINFECTING SWIMMING POOLS

To start up a new pool, open a pool for the season or convert from a chlorine based program, backwash or clean the filter, chemically balance the calcium hardness and alkalinity and adjust pH to 7.2-7.6. Superoxidate to obtain a residual of 10-20 ppm available bromine (5-10 ppm available chlorine) as determined by a suitable test kit. Swimming may begin when the bromine level drops below 6 ppm.

When the bromine level drops below 1-3 ppm, add 0.2-2.0 ounces of this product per 1000 gallons daily or as needed to maintain 1-3 ppm available bromine. High temperatures, the presence of debris, increased bather use and other factors may require more frequent treatments. Add this product to a suitable feeding device, adjusting the feeder in accordance with the manufacturer's instructions so as to maintain 1-3 ppm levels of available bromine. The pH of the water must be maintained between 7.2 and 7.6.

Superoxidation: Water soluble, non-filterable wastes can accumulate in pool water and cause dull or cloudy water and can stimulate algal growth. Superoxidation or superchlorination with a suitable oxidizing shock treatment should be done weekly or bi-weekly, after extremely heavy bather loads or heavy rain storms. Suitable oxidizing agents are those based on calcium hypochlorite, lithium hypochlorite, sodium hypochlorite or potassium peroxymonopersulfate.

Each tablet weighs approx. .8 oz. (23 grams)

E.P.A. REG. NO. 66397-1
E.P.A. EST. NO. 66397-NJ-1

manufactured by:
Mid-Continent Packaging, Inc.
1200 N. 54th St., Enid, OK 73701

AquaBasics™

Brominating Tablets

FOR POOLS AND SPAS

ACTIVE INGREDIENTS:

1-Bromo-3-chloro-5, 5-dimethylhydantoin..... 86.4%
1,3-dibromo-5, 5-dimethylhydantoin..... 8.6%
OTHER INGREDIENTS: 5.0%

TOTAL: 100.0%

Provides: 66.8% Available Bromine
25.4% Available Chlorine

ACCEPTED
with COMMENTS

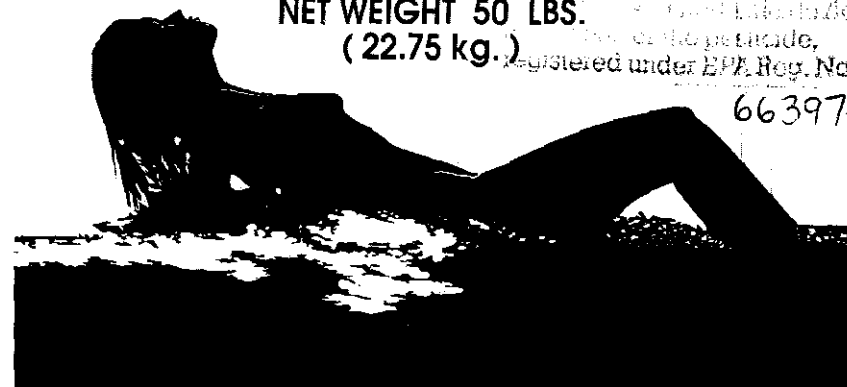
KEEP OUT OF REACH OF CHILDREN
DANGER

SEE FIRST AID AND OTHER PRECAUTIONS ON BACK PANEL

NET WEIGHT 50 LBS.
(22.75 kg.)

Registered under EPA Reg. No.

66397-1



→ Proper sanitary practices require changing spa water at a minimum of every 30 days.