

May 21, 2003

Mark Jernigan
Recreational Water Products, Inc.
P.O. Box 887
Scottdale, GA 30079

Subject: RWP Master BCDMH
EPA Registration No. 67262-23
Submission Dated: March 12, 2003
Receipt Date: March 19, 2003

Dear Mr. Jernigan:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

- revisions Per PR Notice 2001-1
- add re-entry statement after each swimming pool and spa direction
- revise Storage and Disposal
- update Hazards to Humans and Domestic Animals
- add Physical and Chemical Hazards section

Conditions

1. Revise the "Hazards to Humans and Domestic Animals" as follows:

Hazards to Humans and Domestic Animals: **DANGER. Highly Corrosive.** Causes irreversible eye damage and skin burns. Harmful if swallowed. Irritating to nose and throat. Do not get in eyes, on skin or clothing. Wear protective eyewear (goggles or safety glasses). Wear protective clothing and rubber gloves when handling this product. Avoid breathing dust and fumes. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

2. The treatment levels for swimming pools on the submitted label are 5 ppm and below, therefore, we are revising the re-entry language to reflect 5 ppm. The re-entry statement should read: "Reentry into treated swimming pools is prohibited above levels of 5 ppm bromine due to risk of bodily injury."

CONCURRENCES

SYMBOL	7570C							
SURNAME	Mitchell							
DATE	5/21/03							

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General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Mitchell at (703) 308-6345.

Sincerely,



*Robert S. Brennis
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)*

{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.}

RWP
MASTER BCDMH

{Optional marketing statements that may be used with pool bromination.}

[For low-odor sanitization]

[For pools & spas] {When directions for both pool and spa bromination appear on the same label.}

[Sanitizer]

[Disinfectant]

[Bactericide]

[Algicide]

[No chlorine odor]

{Optional marketing statements that may be used with spa bromination.}

[For low-odor sanitization]

[Sanitizer]

[Disinfectant]

[Bactericide]

[Algicide]

[No chlorine odor]

{Optional marketing statements that may be used with spa mini pak bromination.}

[For low-odor sanitization]

[Sanitizer]

[Disinfectant]

[Bactericide]

[Algicide]

[No chlorine odor]

{Optional marketing statements that may be used with spa floater bromination.}

[For low-odor sanitization]

[Sanitizer]

[Disinfectant]

[Bactericide]

[Algicide]

[No chlorine odor]

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAY 21 2003

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

67262-23

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{Optional marketing statements that may be used with brominating cartridge system.}

- [For low-odor sanitization]
- [Sanitizer]
- [Disinfectant]
- [Bactericide]
- [Algicide]
- [No chlorine odor]

ACTIVE INGREDIENT:	
1-Bromo-3-chloro-5,5-dimethylhydantoin	96.0%
OTHER INGREDIENTS:	4.0%
TOTAL:	100.0%

Available Bromine: 63.5%
 Available Chlorine: 28.2%

KEEP OUT OF REACH OF CHILDREN
DANGER

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 mouth-to-mouth, if possible. Call poison control center or doctor for treatment advice. **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. **[IN CASE OF MEDICAL EMERGENCY, CALL [1-303-623-5716] [1-877-800-5553] [telephone number supplied by supplemental registrant].]**

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

See [back] [side] panel for additional precautionary statements.

MANUFACTURED FOR:
 RECREATIONAL WATER PRODUCTS, INC.
 PO BOX 887
 SCOTSDALE, GA 30079

EPA REG. # 67262-23
 EPA EST. # 5185-GA-1

NET WEIGHT:

{Directions to be used for pool bromination}

POOL BROMINATION

WHY TO USE THIS PRODUCT: This product is a highly effective sanitizer for your swimming pool water. It's sanitizing ability is less impaired by pH fluctuations than chlorine based sanitizers, thus providing more consistent levels of sanitation. In addition, this product does not require the use of a stabilizer and will not produce the unpleasant chlorine odors that are many times associated with other sanitizers.

IMPORTANT NOTES:

1. When using other products, as outlined in directions for this product, always follow label directions for those products.
2. Damage may be caused by direct contact of this product with pool surface or materials such as colored plaster, vinyl, wood or fiberglass.
3. To effectively sanitize your pool, this product must be used in a feeding device specifically designed for use with bromine. This product should not be used in a skimmer.
4. Sunlight, rainfall, temperature, number of swimmers and frequency of pool use affect the rate of bromine loss. Adjust cleaning and chemical maintenance accordingly. To prevent the establishment of harmful algae and micro-organisms, superchlorinate (shock) pool every 2-4 weeks.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

BEFORE YOUR BEGIN

1. Make sure all pool equipment is working properly. Backwash pool filter following manufacturer's directions.
2. Check water alkalinity, pH and calcium hardness with a test kit. Adjust alkalinity to 80 - 125 ppm for plaster pools, 125 - 150 for vinyl or fiberglass pools by adding an alkalinity increaser. Adjust pH to 7.2-7.6 by adding a pH decreaser to lower pH, or by adding a pH increaser to raise pH. Adjust calcium hardness to 200 - 275 ppm for plaster pools, 175 - 225 for vinyl or fiberglass pools by adding a calcium hardness increaser.

NOW USE THIS PRODUCT:

1. Fill bromine feeder with this product and adjust feeder to the highest feed rate following manufacturer's recommendations.
2. When the bromine residual reaches 1-2 ppm, adjust the feeder to maintain the correct bromine residual for your application: 1-3 ppm in residential pools, and 3-5 ppm in commercial pools. Regular use of a test kit will help to maintain a bromine residual in the pool water.

Reentry into treated swimming pools is prohibited above levels of 8 ppm bromine due to risk of bodily injury.

{Directions to be used for spa bromination}

SPA BROMINATION

WHY TO USE THIS PRODUCT: This product is a highly effective sanitizer for your spa or hot tub water and will help maintain sparkling clean, odor-free water. It's sanitizing ability is less impaired by pH fluctuations than chlorine based sanitizers, thus providing more consistent levels of sanitation. In addition, this product does not require the use of a stabilizer and will not produce the unpleasant chlorine odors that are many times associated with other sanitizers.

IMPORTANT NOTES

1. When using other products, as outlined in directions for this product, always follow label directions for those products.
2. Damage may be caused by direct contact of this product with spa or hot tub surfaces or materials such as colored plaster, vinyl, wood or fiberglass.
3. Sunlight, rainfall, temperature, number of bathers and frequency of spa and hot tub use affect the rate of bromine loss. Adjust cleaning and chemical maintenance accordingly.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

BEFORE YOUR BEGIN

1. Make sure all spa or hot tub equipment is working properly. Backwash filter following manufacturer's directions.
2. Check water alkalinity, pH and calcium hardness with a test kit. Adjust alkalinity to 80 -125 ppm for plaster spas, 125 - 150 for other spa type surfaces by adding an alkalinity increaser. Adjust pH to 7.2-7.6 by adding a pH decreaser to lower pH, or a pH increaser to raise pH. Adjust calcium hardness to 200-275 ppm for plaster spas or 175-225 for other types of spa surfaces by adding a calcium hardness increaser.

NOW USE THIS PRODUCT:

1. Fill spa bromine feeder with this product and adjust feeder following manufacturer's directions to yield bromine residual between 2-4 ppm in residential spas and 4-6 ppm in commercial spas.
2. The pump and filter should be operated for at least three hours every day whether spa is used or not. Do not heat water above 104°F
3. To maintain clear, clean water and insure the performance of your spa chemicals, spas should be drained and refilled with fresh water every 60 days.

Reentry into treated spas is prohibited above levels of 8 ppm bromine due to risk of bodily injury.

{Directions to be used for spa mini pak bromination}

SPA MINI PAK BROMINATION

This product is a highly effective sanitizer for your spa or hot tub water and will help maintain sparkling clean, odor-free water. It's sanitizing ability is less impaired by pH fluctuations than chlorine based sanitizers, thus providing more consistent levels of sanitation. In addition, this product does not require the use of a stabilizer and will not produce the unpleasant chlorine odors that are many times associated with other sanitizers.

IMPORTANT NOTES

- 1. When using other products, as outlined in directions for this product, always follow label directions for those products.
- 2. Damage may be caused by direct contact of this product with spa or hot tub surfaces or materials such as colored plaster, vinyl, wood or fiberglass.
- 3. Sunlight, rainfall, temperature, number of bathers and frequency of spa and hot tub use affect the rate of bromine loss. Adjust cleaning and chemical maintenance accordingly.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

BEFORE YOUR BEGIN

- 1. Make sure all spa or hot tub equipment is working properly. Backwash filter following manufacturer's directions.
- 2. Check water alkalinity, pH and calcium hardness with a test kit. Adjust alkalinity to 80 -125 ppm for plaster spas, 125 - 150 for other types of spa surfaces by adding an alkalinity increaser. Adjust pH to 7.2-7.6 by adding a pH decriaser to lower pH, or a pH increaser to raise pH. Adjust calcium hardness to 200-275 ppm for plaster spas or 175-225 for other types of spa surfaces by adding a calcium hardness increaser.

NOW USE THIS PRODUCT:

- 1. Place one or more of this product in skimmer basket.
- 2. Add additional product to maintain bromine residual of 2-4 ppm in residential spas .
- 3. Normally, one of this product for each 200 gallons, or fraction, of water will be sufficient to maintain proper bromine levels.
- 4. The pump and filter should be operated for at least three hours every day. Do not heat water above 104°F.
- 5. Residential spas and hot tubs should be drained and refilled with fresh water every 60 days.

Reentry into treated spas is prohibited above levels of 8 ppm bromine due to risk of bodily injury.

{Directions to be used for spa floater bromination}

SPA FLOATER BROMINATION

WHY TO USE THIS PRODUCT:

This product is a highly effective sanitizer for your spa or hot tub water and will help maintain sparkling clean, odor-free water. Its self contained delivery system makes for trouble free sanitation and tells you when you need to add more product. This product's sanitizing ability is less impaired by pH fluctuations than chlorine based sanitizers, thus providing more consistent levels of sanitation.

In addition, this product does not require the use of a stabilizer and will not produce the unpleasant chlorine odors that are associated with other sanitizers.

IMPORTANT NOTES

1. When using other products, as outlined in directions for this product, always follow label directions for those products.
2. Damage may be caused by direct contact of this product with spa or hot tub surfaces or materials such as colored plaster, vinyl, wood or fiberglass.
3. Sunlight, rainfall, temperature, number of bathers and frequency of spa and hot tub use affect the rate of bromine loss. Adjust cleaning and chemical maintenance accordingly.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

BEFORE YOUR BEGIN

1. Make sure all spa or hot tub equipment is working properly. Backwash filter following manufacturer's directions.
2. Check water alkalinity, pH and calcium hardness with a test kit. Adjust alkalinity to 80 -125 ppm for plaster spas, 125 - 150 for other types of spa surfaces by adding an alkalinity increaser. Adjust pH to 7.2-7.6 by adding a pH decreaser to lower pH, or a pH increaser to raise pH. Adjust calcium hardness to 200-275 ppm for plaster spas or 175-225 for other types of spa surfaces by adding a calcium hardness increaser.

NOW USE THIS PRODUCT:

1. Place one or more of this product in skimmer basket or directly in spa or hot tub. (Usually one dispenser per 350 gallons water.)
2. Maintain bromine residual at 2-4 ppm in residential spas.

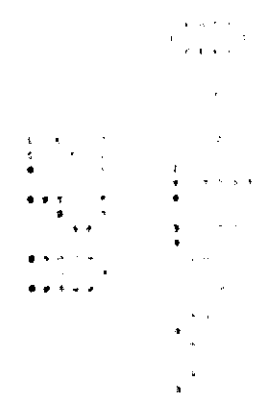
FOR START UP/FRESH FILL WATER:

1. Twist cap so the flow indicator setting is on #5. Put chemical dispenser in spa water.
2. Test bromine residual frequently.
3. When a 2-4 ppm bromine residual is obtained, lower the flow indicator setting to maintain a desired residual of 2-4 ppm.

FOR GENERAL MAINTENANCE:

1. To increase the amount of bromine dispensed, turn the cap to a higher number located in the flow indicator window. To decrease the bromine residual, turn to a lower number in the flow indicator window.
2. As the bromine in your floater dissolves, additional floaters should be added to maintain a 2-4 ppm bromine residual.
3. The pump and filter should be operated for at least three hours per day. Do not heat water above 104°F.
4. Residential spas and hot tubs should be drained, cleaned and refilled with fresh water every 60 days.

Reentry into treated spas is prohibited above levels of 8 ppm bromine due to risk of bodily injury.



{Directions to be used for brominating cartridge system}

BROMINATING CARTRIDGE SYSTEM

WHY TO USE THIS PRODUCT: The Brominating Cartridge System is part of an advanced Feeder/Cartridge Delivery System that efficiently controls bacteria and algae for weeks under normal conditions in a balanced pool. The convenient disposable cartridge lets you control the rate of delivery to meet changing conditions in your pool, by simply adjusting the control dial on the delivery system. You never have to touch the chemical. **USE ONLY IN BROMINATING CARTRIDGE SYSTEM.**

IMPORTANT NOTES:

1. When using other products, as outlined in directions for this product, always follow label directions for those products.
2. Damage may be caused by direct contact of this product with pool surface or materials such as colored plaster, vinyl, wood or fiberglass.
3. Sunlight, rainfall, temperature, number of swimmers and frequency of pool use affect the rate of bromine loss. Adjust cleaning and chemical maintenance accordingly.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

BEFORE YOUR BEGIN

1. Make sure all pool equipment is working properly. Backwash pool filter following manufacturer's directions.
2. Check water alkalinity, pH and calcium hardness with a test kit. Adjust alkalinity to 80 - 125 ppm for plaster pools, 125 - 150 for vinyl or fiberglass pools by adding an alkalinity increaser. Adjust pH to 7.2-7.6 by adding a pH decreaser to lower pH, or by adding a pH increaser to raise pH. Adjust calcium hardness to 200 - 275 ppm for plaster pools, 175 - 225 for vinyl or fiberglass pools by adding a calcium hardness increaser.

NOW USE THIS PRODUCT:

1. **TO INSTALL CARTRIDGE:** Take feeder cap off. Remove cartridge tabs A and B where designated (see diagram). Hold cartridge so the open end faces down. Point the arrow in the direction of the water flow (towards pool). Insert into feeder with the male end of the cartridge aligned with the female end located inside the bottom of the feeder (see diagram). **DO NOT FORCE.** Replace feeder-cap and set the control dial to the appropriate setting.
2. Begin with the control dial set on 2 for a 13,500 gallon pool with a pump running 8 hours/day. Check bromine residual in 24 hours and increase/decrease feeder setting to maintain 1-3 ppm bromine residual.
3. During superchlorination of pool, turn setting to 0 before superchlorination. Establish bromine residual and return the feeder to the normal operating setting. Check the feeder canister periodically and replace when empty. Do not attempt to open or refill this cartridge.

Reentry into treated swimming pools is prohibited above levels of 8 ppm bromine due to risk of bodily injury.

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 or open flame. Do not contaminate food or feed by storage or disposal. **CONTAINER DISPOSAL:** Do not reuse container, but place in trash collection. Rinse thoroughly before discarding in trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER: Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed. Irritating to nose and throat. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles or safety glasses). Wear protective clothing and rubber gloves when handling this product. Avoid breathing dust and fumes. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

PHYSICAL OR 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. When using automatic feeding devices, always follow manufacturer's directions as to the proper addition of sanitizer product to brominators. 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 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 statement for end-use products in containers of less than 5 gallons (liquid) or less than 50 pounds (solid, dry weight).}

[ENVIRONMENTAL HAZARDS This pesticide is toxic to fish and aquatic organisms.]

{Environmental hazards statement for end-use products in containers of equal to or greater than 5 gallons (liquid) or equal to or greater than 50 pounds (solid, dry weight).}

[ENVIRONMENTAL HAZARDS 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. 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.]

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

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{The following is optional text to be used at Recreational Water Products' discretion. This information is non-essential and will be provided only as a courtesy. Will not appear on all labels.}

[NOTE: Any questions or comments about Aqua Chem Products? In the continental U.S. call 1-800-252-POOL (7665). Ask for your free pool care booklet.]

[Questions or comments, Call 1-800-252-POOL (7665).]

