



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 9, 2015

Levi Howell
Regulatory Affairs Specialist
Clearon Corp.
95 MacCorkle Avenue SW
South Charleston, WV 25303

Subject: Notification per PRN 98-10 – Revised Administrative Information
Product Name: BROM SPA
EPA Registration Number: 69470-36
Application Date: June 11, 2015
Decision Number: 506128

Dear Mr. Howell:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

If you have any questions, you may contact Wanda Henson at (703) 308-6345 or via email at henson.wanda@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Wanda J. Henson, for".

Demson Fuller, Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510P)
Office of Pesticide Programs

{All text in brackets [xyz] is optional and may or may not be intended on a final label.}
{All text in braces {xyz} is administrative and won't appear on a final label.}

NOTIFICATION

69470-36

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

07/09/2015

BROM SPA

[[ISIS] [or] [Genesis] water sanitization system]
[Blu Water Bromine Generator Technology]

ACTIVE INGREDIENT: Sodium Bromide..... 99%
OTHER INGREDIENTS:1%
TOTAL100%

KEEP OUT OF REACH OF CHILDREN
CAUTION

[See [side] [back] panel[s] for additional precautionary statements [and First Aid]].

Table with 2 columns: Condition (e.g., If on skin or clothing, If swallowed, If in eyes, If inhaled) and First Aid instructions. Includes a section for emergency contact (1-800-420-9236) and a note to physician.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Harmful if absorbed through the skin. Do not get in eyes, on skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

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

CHEMICAL AND PHYSICAL HAZARDS

Will decompose above 1472°F (800°C), releasing toxic gases. Avoid communiton and dusting. Avoid contact with strong oxidizers (other than sodium hypochlorite and chlorine), acids, alkaloidal and heavy metal salts.

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DIRECTIONS FOR USE

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

FOR INDOOR OR OUTDOOR COVERED SPAS ONLY

(Not for use in swimming pools)

BROM SPA is designed to be used in conjunction with [ISIS] [or] [Genesis], a water sanitization system for spas that uses Blu Water Bromine Generator Technology, an electrolysis unit that converts bromide into hypobromite solution. The produced hypobromite solution (bromine) is then introduced into the spa to be treated as a sanitizer for spa water.

INITIAL DOSAGE:

Upon initial filling of spa with fresh water, add 1.2 pounds of BROM SPA per 100 gallons of spa water to a spa equipped with an [ISIS] [or] [Genesis] water sanitization system (with Blu Water Bromine Generator Technology). This will establish sufficient bromide reserve for the bromine generator to operate properly.

MAINTENANCE:

An [ISIS] [or] [Genesis] water sanitization system (with Blu Water Bromine Generator Technology) will operate to produce available bromine as designed until the bromide reserve goes below required levels. BROM SPA should be added if the bromide level drops below the initial charge. Dilution, splash out and leaks are primary reasons for the bromide level to drop. If the bromine generator does not produce enough available bromine, make sure the recommended level of 1440 ppm as sodium bromide is still present in the spa water. The level can be tested with a [Total Dissolved Solids test (TDS meter),] a salt test or by taking a water sample to a spa/pool store. If BROM SPA is being added repeatedly the spa should be checked for leaks.

Before entering the spa the bromine level should be tested. The available bromine level should be maintained between 3-5 ppm as active residual bromine level and can be tested with a suitable test kit found at any spa/pool store. If the bromine level is above 8 ppm then turn the spa off until the level drops below 5 ppm. The bromine generator only produces bromine when the spa is circulating. For more immediate results, dilution with fresh water will lower the bromine level. Outdoor spas should be covered when not in use.

Spa water has a tendency to foam and cloud that is directly proportional to the amount of use it receives. This is due to the accumulation of body fats and oils and contaminants too small for the filtration equipment. To a great extent, defoamer, clarifier, shock treatments, and demineralizers or sequestering agents can be used to clear the water. When this becomes impossible, draining, cleaning, and refilling the spa will be the most satisfactory way of solving this problem.

For problems beyond those listed above, consult your [ISIS] [or] [Genesis] product manual or call your Blu Water Technology dealer.

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry, well-ventilated area, in well-closed original containers.

PESTICIDE DISPOSAL: Do not contaminate water, feed or food by storage or disposal. Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY

Seller warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated on the label when use in accordance with label directions under normal conditions of use, but to the extent consistent with applicable law, neither this warranty nor any other warranty of MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, express or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to Seller, and Buyer assumes the risk of any such use.

Manufactured [in] [Israel] [China] for:
Clearon Corp.
95 MacCorkle Ave SW
South Charleston, WV 25303

EPA Reg. No. 69470-36
EPA Est. No. _____