

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

December 28, 2009

Wendy A. McCombie, Agent for Shikoku International Corp. c/o Lewis and Harrison 122 C Street, N. W. Suite 740 Washington, D.C. 20001

Subject:

Notification dated: November 24, 2009

Neo-Chlor Spa Angel Tab EPA Registration 72139-2

Dear Ms. McCombie:

This acknowledges receipt of your Notification submitted in accordance with the provisions of PR Notice 98-10 under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)9.

Proposed Notification

• Change residual chlorine to free chlorine in the use directions.

General Comments

Based on a review of the material submitted, the notification is acceptable.

Should you have any questions or comments concerning this letter, please contact Tom Luminello at (703) 308-8075.

Sincerely,

Wanda Y. Henson

Acting Product Manager 32

Regulatory Management Branch II Antimicrobials Division (7510P)

Please read instructions on reverse before con ting form.	Form Approve OMB No. 2070-0060, Approval expires 05-31-98					
⚠ United States	- [Registration	OPP Identifier Number			
EPA Environmental Protection	Agency	Amendment				
Washington, DC 20460	0 🗵	Other NOTIFICATIO	N			
Application	n for Pesticide	– Section I				
1. Company/Product Number	2. EPA Product Ma		3. Proposed Classification			
Neo-Chlor Spa Angel Tab	Marshall Swin	dell	None Restricted			
4. Company/Product (Name) 72139-2	PM# 33					
5. Name and Address of Applicant (Include ZIP Code) Shikoku International Corporation			ith FIFRA Section 3(c)(3)			
301 North Rampart Street #C	(b)(1), my produ to:	ICT IS SIMilai Or Identicarii	n composition and labeling			
Orange, CA 92668						
PLEASE SEND ALL CORRESPONDENCE TO						
CONTACT POINT ISTED BELOW	1 100000110					
Check if this is a new address						
	Section – II					
Amendment – Explain below.		inal printed labels in response t	to Agency letter dated			
Resubmission in response to Agency letter dated		Me Too" Application				
Notification – Explain below.		Other - Explain below	· · · · · · · · · · · · · · · · · · ·			
Explanation: Use additional page(s) if necessary. (F						
APPLICATION FOR N Notification of Minor Label Cha			QR_1N			
This notification is consistent with the provisions of PR Notice 98-10	and EPA regulations	at 40 CFR 152.46, and no other	er changes have been made to the			
labeling or the confidential statement of formula of this product. I statement to EPA. I further understand that if this notification is not confidence.						
violation of FIFRA and I may be the subject to enforcement action an			JER 102.40, tills product may bo m			
and the same of th		Data:	04 November 0000			
Oignature		Batc	24 November 2009			
THIS SUBMISSION		I 10 PRIA FEES				
	Section – III		·			
Material This Product Will Be Packaged In: Child-Resistant Packaging Unit Packaging	Water	Soluble Packaging	2. Type of Container			
Yes* Yes		es	Metal			
□ No			Plastic			
If "Yes" N	lo. per If "Yes	" No. per	Glass			
*Certification must Unit Packaging wgt. co	ontainer Packa	ge wgt. container	Paper			
be submitted			Other (Specify)			
3. Location of Net Contents Information 4. Size(s) Ret	tail Container		Label Directions			
Label Container		On Label				
6. Manner in Which Label is Affixed to Product Lithograp	oh [Other On labelli	ng accompanying product			
Paper glued						
☐ Stenciled						
Section – IV						
1. Contact Point (Complete items directly below for identification of	f individual to be con					
	ku Chemicals Corp.	elephone Noଁ (Inclide Area Code) 202-393-3903 x11				
wmccombie@lewisharrison.com Certification	<u></u>		6. Date Application			
I certify that the statements I have made on this form and all attach	hments thereto are tr		ြင့္ရွိ Received			
acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both (Stamped) under applicable law.						
2. Signature 3. Tit			() () () ()			
waysu. Ca	Agent for Shiko	ku Chemicais Corp.	, (
4. Typed Name 5. Da			, , , , , , , , , , , , , , , , , , ,			
Wendy A. McCombie, Lewis & Harrison, LLC	24 Nov	ember 2009	6666			

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740 Washington, D.C. 20001

telephone 202.393.3903 fax 202.393.3906

direct 202.393.3903 ext. 11 wmccombie@lewisharrison.com

November 24, 2009

HAND DELIVERED

Antimicrobials Division (Mail Code 7504P)
Office of Pesticide Programs
Document Processing Desk [NOTIFY]
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

ATTENTION:

Emily Mitchell

Product Manager, Team 32 Antimicrobials Division

SUBJECT:

Shikoku International Corporation

Neo-Chlor Spa Angel Tab (EPA Reg. No. 72139-2)

Notification of Minor Label Changes per PR Notices 1998-10

This Submission Is NOT Subject To PRIA Fees

Dear Ms. Mitchell:

On behalf of Shikoku International Corporation ("Shikoku"), we are notifying the Agency of minor changes to the label for Neo-Chlor Spa Angel Tab in accordance with PR Notice 1998-10.

The purpose of this Notification is to provide additional clarification and continuity in the Directions For Use section. Currently the narrative part of Directions For Use refers to the chlorine levels as "residual chlorine," while the dosage table refers to the chlorine levels as "free chlorine." All of the references to chlorine have been revised so that the entire section reflects the "free chlorine" terminology. None of the use rates or other language within the Directions For Use section has been changed.

Please find enclosed the following documents to support the notification for Neo-Chlor Spa Angel Tab:

- 1) Pesticide Application Form;
- 2) One (1) copy of the proposed product label with the changes marked; and,
- 3) Three (3) copies of the proposed product label.

Insofar as I am the authorized "Contact Point" and "Company Agent" for Shikoku, please relay all correspondence directly to me at 122 C Street NW, Suite 740, Washington DC 20001. If you have any questions, please contact me by telephone at 202-393-3903 ext. 11 or by e-mail at wmccombie@lewisharrison.com.

Thank you very much for your cooperation.

Sincerely,

Wendy A. McCombie

for,

Shikoku International Corporation

Enclosures

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS.

DANGER. Corrosive. Causes irreversible eye damage. Wear protective eyewear such as safety glasses, face shield or goggles. Harmful if swallowed, inhaled or absorbed through the skin. Do not get in eyes, on skin or on clothing. Avoid contact with skin. 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 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 EPA.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT. Mix only with water. Use only clean, dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a volent reaction teading 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 containination or decomposition, do not reseal container. If possible isolate each container in open air or well-ventilated area. Flood with large volumes of water if necessary.

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 by mouth-to-mouth, if possible. Call a 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.			
	NOTE TO PHYSICIAN			
	Probable mucosal damage may contraindicate the use of gastric lavage. roduct container or label with you when calling a Poison Control Center or doctor, or going for treatment.			

STORAGE AND DISPOSAL

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

Storage: ,Keep product,dry in tightly closed container when not in use. Store in a cool, dry, well-ventilisted, area away from heat or open flame. In case of decomposition, isolate container, if possible, and floct with large amounts of water to dissolve material before discarding.

Pesticide Olsiosai: Place in trash collection or dispose in an approved landfill area.

Container Disposai: Neneellable container. Do not reuse or refill this container. Offer for recycling if available. Rinse empty container thoroughly with water to dissolve all material before discarding. Place in trash collection, dispose in an approved landfill area.

Spa Angel Tab



[0.4 OUNCE (12-GRAM) TABLETS] [0.2 OUNCE (6-GRAM) TABLETS]

- Tablet contains Japanese Hot Spa ingredients
- Controls growth of bacteria and algae in spas and hot tubs
- Quickly dissolves in water
- · Easy to use tablets just fit your spa size
- Enrich your spa life

ACTIVE INGREDIENT:
Sodium Dichloroisocyanurate*
OTHER INGREDIENTS:

30.69% 69.31%

TOTAL: 100.00%

*Available chlorine 19.2%

DANGER
KEEP OUT OF REACH OF CHILDREN
(SEE SIDE/BACK PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS)

DIRECTIONS FOR USE

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

For routine maintenance of spas and hot tubs to control bacteria and algae:

1. Before using spa or hot tub, test water, pH, free chlorine residual and alkalinity using a reliable test kit. Adjust pH to between 7.2 – 7.6.

2. With the pump on, and using the table below as a guide, add sufficient tablets to establish a residual level of 3 – 5 ppm [ree chlorine as determined by the test kit. Do not enter the water until the free chlorine level drops to 5 ppm or less. Re-entry into treated spas is prohibited above levels of 5 ppm due to risk of bodily harm.

Before using the spa, bathers should shower in order to avoid adding soap, lotions, or oils from the body into the water. Avoid overloading the spa.

Depending on how heavily the spa is used, it may be necessary to super chlorinate the water as frequently as after each use or as infrequently as once per week, in a moderately used spa.

1. Using the table as a guide, superchlorinate water to 6.0 – 8.0 ppm free chlorine residual-by additional tablets to the spa or hot tub.

2. Do not allow bathers to enter the spa [or hot tub] until the <u>free</u> chlorine residual-falls to 3.0 to 5.0 ppm. Re-entry into treated spas is prohibited above levels of 5ppm due to risk of bodily harm.
3. If spa or hot tub water does not clear after superchlorination treatment, drain, clean and refill with fresh water.

DOSAGE (for 0.4-ounce (12-gram) tabs)

Free	Gallons of Water in Spa					
Chlorine	300	340	355	400	500	550
(PPM)	Number of Tablets					
3-4	2	2	2	30 (3)	3	3
4-5	The state of	CONTRACTOR OF THE PARTY OF THE	3	3	4	4
5-6	3	3	PACE.	4	5	5
6-7	8.7.00(m)	4	4	2000	6	6
7-8	4	222066	100	5	2000	7
8-9	¥22.00°	5	5	6	7	8
9-10	5	1006125	6	725.50	8	9

DOSAGE Ifor 0.2-ounce (6-gram) tabsi

0.2-0un					
Gallons of Water in Spa					
300	500	550			
Number of Tablets					
4	4	4	W. 10	6	6
4	***	6	6	8	8
6	6		8	10	10
W. 10.	8	8	70	12	12
8	元/674	30000	10		14
w. C	10	10	12	14	. 16
10		12	*	16	18
	300 4 6 8	Ga 300 340 4 4 4 6 6 6 8 8 8 10	Gallons of V 300 340 355 Number 4 4 4 4 4 6 6 6 6 8 8 8 8 8 8 8 8 8 8 8	Gallons of Water in 300 340 355 400 Number of Table 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	Gallons of Water in Spa 300 340 355 400 500 Number of Tablets 4 4 4 6 6 8 10 8 8 8 12 8 10 10 12 14

SPA CAPACITY CALCULATOR:

To Calculate Gallonage For Round Or Oval Spa: Diameter of spa x diameter of spa x depth (all in feet) x 5.9 = pallons.

To Calculate Gallonage For Rectangular spa: depth x length x width (all in feet) x 7.5 = gallons.

EPA Reg. No. 72139-2 EPA Est. No. 33980-JP-1 Net contents: _____ Batch [Lot] Code:

Active ingredient made in Japan SHIKOKU INTERNATIONAL CORPORATION 301 Rampart Street, #C, Orange, CA 92868

Revised October 2009 / Page 1 of 1

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