

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OCT 24 2005

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Georgia Anastasiou, Agent for Sani-Care Salon Products, Inc
c/o Lewis & Harrison
122 C Street N.W., Suite 740
Washington, D.C. 20001

SUBJECT: September 14, 2005 Label Amendment
Sani-Spa Disinfectant Tablet
EPA Registration 75562-1

Dear Ms. Anastasiou:

The application referred to above, submitted in connection with registration of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is conditionally acceptable. The word "Kills" is not allowed and must be changed to "Controls". The "kills" claim can be allowed on a product described as a Sanitizer-Fungistat.

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

Sincerely yours,

A handwritten signature in black ink, appearing to read "Emily H. Mitchell".

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

Enclosure

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Sani-Spa Tablet has been formulated to aid in the reduction of contamination in foot massage and foot spa bath water at salons, spas and beauty parlors. When used as directed, Sani-Spa Tablet will sanitize pedicure foot spa bath, foot massage bath and portable foot spa bath water to keep it clean and clear. This product contains a biostat, a water softener and a pH balancer, all in one tablet. The biostat sanitizes foot spa bath water. The water softener chemically balance the calcium hardness and total alkalinity and pH balancer adjusts the pH to 7.2 - 7.8.

Sani-Spa Tablet:

- delivers sanitizing and cleaning performance in pedicure foot spa water, foot massage bath water and portable foot bath water.
- is effective yet economical.
- cleans and sanitizes in one labor saving step.
- is formulated for use in daily maintenance programs with a balance of detergents and biostats that deliver effective cleaning and sanitizing action.
- is a complete, chemically-balanced sanitizer and fungistat.

Use Sani-Spa Tablet:

- as a sanitizer for pedicure foot spa water, foot massage bath water and portable foot bath water.
- to clean and sanitize pedicure foot spa water, foot massage bath water and portable foot bath water.

Sani-Spa Tablet is proven effective as a sanitizer by the Methods of the AOAC Swimming Pools Test 965.13 (modified) against: *Staphylococcus aureus* ATCC No. 6538 (Staph)

Sani-Spa Tablet is proven effective as a fungistat by the Methods of the AOAC Swimming Pools Test 965.13 (modified) against: *Trichophyton mentagrophytes* ATCC No. 9533 (the Athlete's Foot Fungus) *Candida albicans* ATCC No. 10231

Effective against [bacteria] [*Staphylococcus aureus*] [*Trichophyton mentagrophytes*] [the organism that causes Athlete's Foot Fungus]

Kills 99.99% of [bacteria] [such as *Staphylococcus aureus*] [*Trichophyton mentagrophytes*] [the organism that causes Athlete's Foot Fungus]

Lab Tested

→ Controls

DIRECTIONS FOR USE

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

Before Use By Each Customer:

1. Fill one quarter (1 - 1.25 gallons) of the total capacity of the foot spa bath with warm water.
2. Add one tablet to the foot spa bath water and agitate to dissolve. One tablet in 1 - 1.25 gallons of foot spa bath water will provide an active bromine concentration of 40 ppm.
3. Circulate the water in the foot spa bath for ten minutes. Add enough warm water to fill the foot spa bath to full capacity (4 - 5 gallons) before putting feet in. The active bromine concentration during customer use is 10 ppm.

After Use By Each Customer:

1. All water must be drained and all debris removed from the foot spa bath basin.
2. Thoroughly clean foot spa bath basin with soap and water.
3. Follow all additional manufacturer's recommendations and all State requirements concerning cleaning and disinfection of foot spa bath equipment.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container in areas inaccessible to children. Store at temperatures less than 100 °F. Do not store in direct sunlight. Do not store on side. Avoid creasing or impacting of side walls. Do not reuse empty container. Discard in trash or recycle.

PESTICIDE DISPOSAL: COMMERCIAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: FIBER DRUMS: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused dispose of in the same manner. GLASS BOTTLES: Commercial - Triple rinse (or equivalent). Then dispose of in a sanitary landfill or by other approved State and local procedures.

**SANI-SPA TABLET
SANITIZER - FUNGISTAT**

**For Commercial And Portable Pedicure Foot Spa Baths,
Foot Massage Baths And Foot Baths
Used In Salons, Spas And Beauty Parlors**

Active Ingredients:

1-bromo-3-chloro-5,5-dimethylhydantoin	4.0%
1,3-dichloro-5,5-dimethylhydantoin	1.8%
1,3-dichloro-5-ethyl-5-methylhydantoin	0.7%
Sodium bromide	4.9%
Inert Ingredients:	88.6%
Total:	100.0%

Available bromine	2.63%
Available chlorine	2.97%

**KEEP OUT OF REACH OF CHILDREN
WARNING**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING: Causes substantial but temporary eye injury. Harmful if absorbed through skin, eyes or clothing. Do not get in eyes, on skin or on clothing. Wear goggles, face shield or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing 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 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.

PHYSICAL AND CHEMICAL HAZARDS

STRONG OXIDIZING AGENT: Do not mix this product in concentrated form with any other chemicals. 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.

EPA Reg. No. 75562-1
 EPA Est. No. 75562-GA-001
 Net Weight (as contained in container)
 1.0 lb (453.6 g)

GOVERNMENT

Registered By:
 Sani-Care Salon Products, Inc.
 5295 Webb Pkwy, Lilburn, GA 30047

OCT 24 2005

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

14 SEPTEMBER 2005

75562-1