



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 21, 2018

Tyler B. Murray  
Agent  
Hot Tub Solutions, Inc. D/B/A BLUWATER TECHNOLOGY  
P.O. Box 2315  
Humble, TX 77347

Subject: Label and CSF Amendment – Revised Basic CSF, Alternate Brand Name and Label Revisions  
Product Name: Brom Spa  
EPA Registration Number: 90052-1  
Application Date: December 4, 2017  
Decision Number: 536739

Dear Mr. Murray:

The amended label and CSF referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSF:

- Basic CSF dated 12/04/2017

The Alternate Brand Name "Genesis TRUBLU! Sodium Bromide" has been made a part of the file for this product.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Wanda Henson by phone at (703) 308-6345, or via email at [henson.wanda@epa.gov](mailto:henson.wanda@epa.gov)

Sincerely,

A handwritten signature in blue ink that reads "Wanda J. Henson, for". The signature is written in a cursive style.

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

Enclosure

{90052-1}

{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.}

# BROM SPA

{Alternate Brand Name [Genesis TRUBLU! Sodium Bromide]}

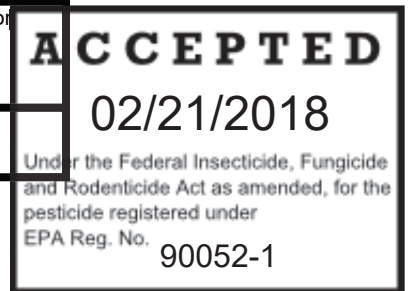
[[ISIS] [or] [Genesis] water sanitization system] [Blu Water Bromine Generator Technology]

ACTIVE INGREDIENT: Sodium Bromide..... 99%  
OTHER INGREDIENTS: .....1%  
TOTAL .....100%

## KEEP OUT OF REACH OF CHILDREN CAUTION

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

FIRST AID	
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>Call a poison control center, or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>Hold eyes open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<p align="center"><b>YOU MAY ALSO CONTACT [1-800-420-9236] FOR EMERGENCY MEDICAL TREATMENT INFORMATION.</b></p>	
<p align="center"><b>NOTE TO PHYSICIAN</b> "Probable mucosal damage may contraindicate the use of gastric lavage."</p>	



### 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:  
HOT TUB SOLUTIONS, INC.,  
D/B/A BLUWATER  
TECHNOLOGY  
PO BOX 2315  
HUMBLE, TX 77347

EPA Reg. No. 90052-1

EPA Est. No. \_\_\_\_\_