



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

MAR 22 2011

Yolanda Walton, Regulatory Affairs Coordinator
Cul-Mac Industries, Inc.
3720 Venoy Road
Wayne, MI 48184

Subject: Product Name: Tech Group Pool Sanitizer
EPA Registration Number: 61903-20002
Amendment Application Date: February 14, 2011

Dear Ms. Walton:

The Agency has reviewed your submission in accordance with continuing registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended, and determined the action acceptable.

In summary, your request to update the Storage and Disposal language in accordance with PR Notice 2007-4 is accepted with following conditions:

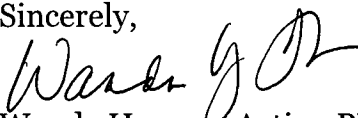
- make the heading for FIRST AID all caps, bold, and larger; and,
- change the advisory instruction "should" to the mandatory "must"; and,
- correct the spelling of "manufacturer's"; and,
- correct the spelling of "at" on page 2; and,
- change the word "pesticide" to "sodium hypochlorite" on page 3.

The Certification with Respect to Child Resistant packaging information you provided was placed into review and will be evaluated at a later time.

Should you wish to retain a reference to the company's website on your label, then please be aware that such a reference transforms the website into labeling under the Federal Insecticide Fungicide and Rodenticide Act sec 2 (p) (2) and then the website is subject to review by the Agency. If the website content is false or misleading, the product would be misbranded and its sale or distribution unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 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. Although EPA has not yet determined the extent to which it will routinely review company websites, if the Agency finds or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from claims approved through the registration process, the website may be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of the accepted labeling is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling. If you have any questions, please contact Tom Luminello by telephone, (703) 308-8075, or by e-mail at luminello.tom@epa.gov.

Sincerely,



Wanda Henson, Acting PM-32
Regulatory Management Branch II
Antimicrobials Division (7510-P)

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TECH GROUP POOL SANITIZER (Front Panel)

Swimming Pool Chlorination Solution

Active Ingredient

Sodium Hypochlorite 10.00%
 Other Ingredients 90.00%
 Total 100.00%
 Available Chlorine 9.52%

ACCEPTED
 with COMMENTS
 in EPA Letter Dated:

MAR 22 2011

U.S. Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, 7 U.S.C. 135-137,
 enforced under EPA Reg. No.

61903-20002

KEEP OUT OF REACH OF CHILDREN
DANGER

FIRST AID

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 further 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.

HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate this use of gastric lavage.

(See additional precautions on side panel)

EPA Registration Number: 61903-20002 NET CONTENTS
 EPA Establishment Number: 61903-MI-01 1 GALLON (3.781L)

NO DEPOSIT
 NO RETURN

DIRECTIONS FOR USE (Left Side Panel)

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING

Note: This product degrades with age. Use a chlorine test kit and increase dosage, as necessary, to obtain the required level of available chlorine.

SWIMMING POOL WATER DISINFECTION

For a new pool or spring start-up, superchlorinate with 54 to 108 oz. of product for each 10,000 gallons of water to yield 5 to 10 ppm available chlorine by weight. Check the level of available chlorine with a test kit. Adjust and maintain pool water pH to between 7.2 to 7.6. Adjust and maintain the alkalinity of the pool to between 50 to 100 ppm.

To maintain the pool, add manually or by a feeder device 12 oz. of this product for each 10,000 gallons of water to yield an available chlorine residual between 0.6 to 1.0 ppm by weight. Stabilized pools should maintain a residual of 1.0 to 1.5 ppm available chlorine. Test the pH, available chlorine residual and alkalinity of the water frequently with appropriate test kits. Frequency of water treatment will depend upon temperature and number of swimmers.

must

Every 7 days, or as necessary, superchlorinate the pool with 54 to 108 oz. of product for each 10,000 gallons of water to yield 5 to 10 ppm available chlorine by weight. Check the level of available chlorine with a test kit. Do not reenter pool until the chlorine residual is between 1.0 to 3.0 ppm.

At the end of the swimming pool season or when water is to be drained from the pool, chlorine must be allowed to dissipate from treated pool water before discharge. Do not chlorinate the pool within 24 hours prior to discharge.

WINTERIZING POOLS- While water is still clear and clean, apply 4 oz. of product per 1000 gallons, while filter is running, to obtain a 3 ppm available chlorine residual, as determined by a suitable test kit. Cover pool, prepare heater, filter and heater components for winter by following manufacturer's instructions.

Manufacturer's

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SPAS AND HOT-TUBS

SPAS/HOT-TUBS – Apply 5 oz. of product per 1000 gallons of water to obtain a free available chlorine concentration of 5 ppm, as determined by a suitable chlorine test kit. Adjust and maintain pool water pH to between 7.2 and 7.8. Some oils, lotions, fragrances, cleaners, etc. may cause foaming or cloudy water as well as reduce the efficiency of the product. To maintain the water, apply 5 oz. of product per 1000 gallon of water over the surface to maintain a chlorine concentration of 5 ppm.

After each use, shock treat with 11 oz. of this product per 500 gallons of water to control odor and algae. During extended periods of disuse, add 4 oz. of product daily per 1000 gallons of water to maintain a 3 ppm chlorine concentration.

(Right Side Panel)

DANGER PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER: CORROSIVE. Causes irreversible eye damage and skin burns. Do not get in eyes or on clothing. Wear goggles or face shield. Wear coveralls worn over long sleeved shirts, and long pants, socks, chemically resistant footwear and chemically resistant gloves. When mixing or loading wear a chemically resistant apron. 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 pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public 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 the product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS: STRONG OXIDIZING AGENT: Mix only with water according to label directions. Mixing this product with gross filth such as feces, urine, etc., or with ammonia, acids, detergents, or other chemicals may release hazardous gases irritating to eyes, lungs and mucous membranes.

STORAGE AND DISPOSAL (for nonrefillable containers ≤ 5 gallons): Store this product in a cool dry area away from direct sunlight and heat to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used must be diluted with water before disposal in a sanitary sewer. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

NON-REFILLABLE CONTAINER. Do not reuse or refill this container. Offer for recycling if available.

CONTAINER CLEANING. Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

SHIP AND STORE THIS CONTAINER IN AN UPRIGHT POSITION AT ALL TIMES. VENTED CAP MAY LEAK, CAUSING BLEACHING AND DAMAGE.

Distributed By:
Cul-Mac Industries, Inc.
3720 Venoy Road, Wayne, Michigan 48184
<http://www.cul-mac.com>

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAR 22 2011

Under the Federal Insecticide,
Fungicide and Rodenticide Act
as amended through 10/3/08,
registered under EPA Reg. No.

61903-
20006