

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 10 2001

Donna L. Butler
PPG Industries, Inc.
One PPG Place, 36 W
Pittsburgh, PA 15272

Subject: Zappit ES
EPA Registration No. 748-294
Submission Dated July 6, 2001

Dear Ms. Butler:

This amendment was submitted in response to an Agency letter dated June 7, 2001 to PPG Industries, Inc., requesting labeling changes and child resistant packaging certification.

The labeling referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act. as amended, is acceptable subject to the comments listed below. Three copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. The last phrase under the "Physical and Chemical Hazards" should be revised to read:

*If possible isolate container in open air or well-ventilated area.
Flood with large volumes of water, if necessary.*

2. The Hazards To Humans and Domestic Animals statement should be revised to read:

DANGER: Highly Corrosive. Causes irreversible eye damage and skin damage. Do not get in eyes, on skin, or clothing. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing and shoes before reuse. May be Fatal if swallowed. Irritating to Nose and Throat. Avoid breathing dust.

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

279

A stamped copy of your labeling is enclosed for your records. Submit one (1) copy of the final printed label prior to release of the product for shipment.

Per our conversation submit one copy of the Basic Confidential Statement of Formula for review.

If you have any questions concerning this letter, please contact Wanda Mitchell at (703) 308-6345.

Sincerely,



*Robert S. Brennis
Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510C)*

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ZAPPIT™ ES

**Shock Treatment
and Super Chlorinator for Swimming Pools**

**Kills Bacteria
Controls Algae
Destroys organic contaminants
Restores a Crystal Clarity to Pool Water "OR" Restores Sparkle and Clarity to Pool Water
Fast Dissolving "OR" Quick Dissolving
No need to Predissolve "OR" Eliminates the Need to Predissolve
1 pound Treats 16,500 Gallons**

**EPA Reg. No. 748-294
EPA Est. No. 52270-GA-1**

**ACTIVE INGREDIENT: Calcium Hypochlorite. . . 73%
OTHER INGREDIENTS: 27%
Minimum 70% Available Chlorine**

**KEEP OUT OF REACH OF CHILDREN
DANGER
See additional precautionary statements on back label.**

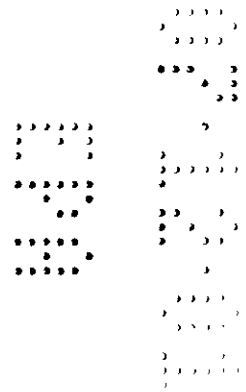
FIRST AID: Contact 1-304-843-1300 or your poison control center for 24-hour emergency medical treatment information. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. If on skin or clothing, take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. If 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 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.

**Manufactured by
PPG INDUSTRIES, INC.
One PPG Place
Pittsburgh, PA 15272
Emergency Telephone Number: (304) 843-1300**

NET WT. 1 lb. (453.6 g) 7/2/2001

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

1 OCT 10 2001
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 748-294



PRECAUTIONARY STATEMENTS - HAZARDS TO HUMANS AND DOMESTIC ANIMALS -

DANGER - Highly Corrosive, causes irreversible eye and skin damage. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing and shoes before reuse. May be Fatal if swallowed. Irritating to Nose and Throat. Avoid breathing dust.

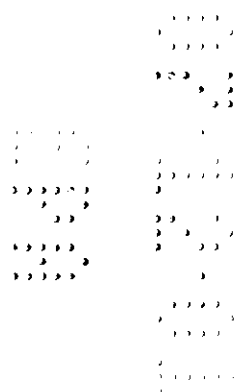
PHYSICAL AND CHEMICAL HAZARDS: Strong oxidizing agent! Mix only with water. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause violent reaction leading to fire or explosion. Contamination with moisture, acids, organic matter, other chemicals or easily combustible materials such as petroleum or paint products may start a chemical reaction with generation of heat, liberation of hazardous gases and possible generation of a fire or explosion.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms.

) **STORAGE AND DISPOSAL:** Keep in original container in a cool, dry, well-ventilated place. Keep container closed when not in use. Keep away from heat sources, sparks, open flames and lighted tobacco products. **Container Disposal** - Do not reuse container. Residual material remaining in empty container can react to cause fire. Thoroughly flush empty container with water then destroy by placing in trash collection. **Pesticide Disposal** - Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Do not contaminate water, food, or feed by storage or disposal.

In Case of Fire - Drench with water. Calcium hypochlorite supplies oxygen; therefore, attempts to smother fire with a wet blanket, carbon dioxide, or a dry chemical extinguisher are ineffective. **In Case of Spill or Leak** - Use extreme caution. Contamination may cause fire or violent reaction. If fire or reaction occurs in area of spill, douse with plenty of water. Otherwise sweep up spilled material, using a clean, dry shovel and broom and dissolve spilled material in water. Then immediately use solution as directed.

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USE ENTIRE BAG IN ONE APPLICATION.

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

Swimming pool water is subject to a build-up of a wide variety of organic contaminants including swimmer wastes, such as perspiration, ammonia compounds, and natural and synthetic oils and lotions. If left untreated, the build-up of these contaminants could lead to the development of noxious odors, irritating water, and unsightly water clarity problems. These organic wastes which serve as nutrients for bacteria, algae, and other organisms should be removed from the pool on a regular basis to prevent their build up. Zappit™ ES will effectively reduce organic contamination in swimming pool water resulting in increased water clarity.

Always adjust pH between 7.2 and 7.4 prior to using Zappit™ ES. To oxidize the organic contamination that builds up in pool water, add 1 pound of Zappit™ ES for every 16,500 gallons of water. (Use the total contents of the one pound package all at one time.) NOTE: Add product to water; Do Not add water to product.

Add this product to the pool by broadcasting the dry granules over the pool water surface in the deepest end of the pool. Do this while the pump is running to allow for the best product dispersion.

You may also add this product directly into the skimmer while the pump is running. Make sure that all other chemicals or debris have been removed from the skimmer before adding product.

Add Zappit™ ES at night or when the pool is not in use. Do Not use the pool until the free chlorine residual has dropped below 3.0 ppm as determined by using a test kit. Zappit™ ES should be used weekly during periods of heavy use or when water temperatures are above 80°F and once every two weeks in residential pools receiving normal usage. Between treatments with Zappit™ ES, continue to maintain the proper water balance and sanitizer level in your pool as recommended on the label of your normal pool sanitizer.

For specific literature on other accepted uses, contact PPG.

NOTE TO EPA: *The above label text is for a one-pound, single use, sealed pouch. When PPG sells this product in the bottles, pails and drums, the following statements will be added under Physical and Chemical Hazards paragraph:*

"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. Use only a clean, dry utensil made of metal or plastic each time product is taken from the container. "

As noted below:

PHYSICAL AND CHEMICAL HAZARDS: Strong oxidizing agent! Mix only with water. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause violent reaction leading to fire or explosion. Contamination with moisture, acids, organic matter, other chemicals or easily combustible materials such as petroleum or paint products may start a chemical reaction with generation of heat, liberation of hazardous gases and possible generation of a fire or 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. Use only a clean, dry utensil made of metal or plastic each time product is taken from the container.

NOTE TO EPA: *Per PR Notice 95-1, the following paragraph will only be used on 50# or larger sizes:*

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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

NOTE TO EPA: *The following Directions for Use will not necessarily be printed on the label due to space restrictions. but will be supplied to the user as needed.*

SEWAGE & WASTEWATER EFFLUENT TREATMENT:

The disinfection of sewage effluent must be evaluated by determining the total number of coliform bacteria and/or Fecal coliform bacteria, as determined by the Most Probable Number (MPN) procedure, of the chlorinated effluent has been reduced to or below the maximum permitted by the controlling regulatory jurisdiction.

On the average, satisfactory disinfection of secondary waste water effluent can be obtained when the chlorine residual is 0.5 ppm after 15 minutes contact. Although the chlorine residual is the critical factor in disinfection, the importance of correlating chlorine residual with bacterial kill must be emphasized. The MPN of the effluent, which is directly related to the water quality standards requirements, should be the final and primary standard and the chlorine residual should be considered an operating standard valid only to the extent verified by the coliform quality of the effluent.

The following are critical factors affecting waste water disinfection:

1. **Mixing:** It is imperative that the product and the waste water be instantaneously and completely flash mixed to assure reaction with every chemically active soluble and particulate component of the waste water.
2. **Contacting:** Upon flash mixing, the flow through the system must be maintained.
3. **Dosage/Residual Control:** Successful disinfection is extremely dependent on response to fluctuating chlorine demand to maintain a predetermined, desirable chlorine level. Secondary effluent should contain 0.2 to 1.0 ppm chlorine residual after a 15 to 30 minute contact time. A reasonable average of residual chlorine is 0.5 ppm after 15 minutes contact time.

EFFLUENT SLIME CONTROL:

Apply a 100 to 1000 ppm available chlorine solution at a location which will allow complete mixing. Prepare this solution by mixing 2 to 20 oz. of this product with 100 gallons of water. Once control is evident, apply a 15 ppm available chlorine solution. Prepare this solution by mixing 0.3 oz. of this product with 100 gallons of water.

DISINFECTION OF DRINKING WATER (Potable Water):

PUBLIC SYSTEMS

Mix a ratio of 1 ounce of this product to 6000 gallons of water. Begin feeding this solution with a hypochlorinator until a free available chlorine residual of at least 0.2 ppm and no more than 0.6 ppm is attained throughout the distribution system. Check water frequently with a chlorine test kit.

Bacteriological sampling must be conducted at a frequency no less than that prescribed by the National Interim Primary Drinking Water Regulations. Contact your local Health Department for further details.

INDIVIDUAL SYSTEMS

Dug Wells - Upon completion of the casing (lining) wash the interior of the casing (lining) with a 100 ppm available chlorine solution using a stiff brush. This solution can be made by thoroughly mixing 1 ounce of this product into 50 gallons of water. After covering the well, pour the sanitizing solution into the well through both the pipe sleeve opening and the pipeline. Wash the exterior of the pump cylinder also with the sanitizing solution. Start pump and pump water until strong odor of chlorine in water is noted. Stop pump and wait at least 24 hours. After 24 hours flush well until all traces of chlorine have been removed from the water. Contact your local Health Department for further details.

INDIVIDUAL WATER SYSTEMS

Drilled, Driven & Bored Wells - Run pump until water is as free from turbidity as possible. Pour a 100 ppm available chlorine sanitizing solution into the well. This solution can be made by thoroughly mixing 1 ounce of this product into 50 gallons of water. Add 5 to 10 gallons of clean, chlorinated water to the well in order to force the sanitizer into the rock formation. Wash the exterior of pump cylinder with the sanitizer. Drop pipeline into well, start pump and pump water until strong odor of chlorine in water is noted. Stop pump and wait at least 24 hours. After 24 hours flush well until all traces of chlorine have been removed from the water. Deep wells with high water levels may necessitate the use of special methods for introduction of the sanitizer into the well. Consult your local Health Department for further details.

Flowing Artesian Wells - Artesian wells generally do not require disinfection. If analyses indicate persistent contamination, the well should be disinfected. Consult your local Health Department for further details.

EMERGENCY DISINFECTION

When boiling of water for 1 minute is not practical, water can be made potable by using this product. Prior to addition of the sanitizer, remove all suspended material by filtration or by allowing it to settle to the bottom. Decant the clarified, contaminated water to a clean container and add 1 grain of this product to 1 gallon of water. One grain is approximately the size of the letter "O" in this sentence. Allow the treated water to stand for 30 minutes. Properly treated water should have a slight chlorine odor, if not, repeat dosage and allow the water to stand an additional 15 minutes. The treated water can then be made palatable by pouring it between clean containers for several times.

PUBLIC WATER SYSTEMS:

RESERVOIRS – ALGAE CONTROL – Hypochlorinate streams feeding the reservoir. Suitable feeding points should be selected on each stream at least 50 yards upstream from the points of entry into the reservoir.

MAINS – Thoroughly flush section to be sanitized by discharging from hydrants. Permit a water flow of at least 2.5 feet per minute to continue under pressure while injecting this product by means of a hypochlorinator. Stop water flow when a chlorine residual test of 50 ppm is obtained at the low pressure end of the new main section after a 24 hour retention time. When chlorination is completed, the system must be flushed free of all heavily chlorinated water.

NEW TANKS, BASINS, etc.: Remove all physical soil from surfaces. Place 2.5 ounces of this product for each 5 cubic feet of working capacity (500 ppm available chlorine). Fill to working capacity and allow to stand for at least 4 hours. Drain and flush with potable water and return to surface.

NEW FILTER SAND – Apply 15 ounces of this product for each 150 to 200 cubic feet of sand. The action of the product dissolving as the water passes through the bed will aid in sanitizing the new sand.

NEW WELLS – Flush the casing with a 50 ppm available chlorine solution of water containing 1 ounce of this product for each 100 gallons of water. The solution should be pumped or fed by gravity into the well after thorough mixing with agitation. The well should stand for several hours or overnight under chlorination. It may then be pumped until a representative raw water sample is obtained. Bacterial examination of the water will indicate whether further treatment is necessary.

EXISTING EQUIPMENT – Remove equipment from service, thoroughly clean surfaces of all physical soil. Sanitize by placing 2.5 ounces of this product for each 5 cubic feet capacity (approximately 500 ppm available chlorine). Fill to working capacity and let stand at least 4 hours. Drain and place in service. If the previous treatment is not practical, surfaces may be sprayed with a solution containing 1 ounce of this product for each 5 gallons of water (approximately 1000 ppm available chlorine). After drying, flush with water and return to service.