

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

March 3, 2003

Robert W. Gruber
Arch Chemicals, Inc.
501 Merritt 7
P.O. Box 5204
Norwalk, CT 06856-5204

Subject: *Pace Chlorinating Sticks*
EPA Registration No. 1258-853
Application Dated: December 12, 2002
Receipt Date: December 16, 2002

Dear Mr. Gruber:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with conditions.

- To provide a rationale for the claims of trichlor pool products as "Sun protected for extended chlorine life" and "Sun resistant for extended chlorine life."*

Conditions

- Remove the extra space from the word "product s" under the How to use the product Swimming Pool directions for use.*
- Add the word "hard" in front of non-porous surfaces under the **Spray method of Sanitizing Equipment**.*
- Correct the typographical error for the word "Canning" under **For Use Throughout Food & Beverage Processing and Food Handling Operations**.*
- The third paragraph under Clean-In Place method of Sanitizing Equipment should be corrected to read as follows:*

CONCURRENCES

SYMBOL	75104						
SURNAME	Mitchell						
DATE	3-3-03						

Prepare a solution containing 100 ppm available chlorine (1oz. of product per 67 gallons of water) in a volume sufficient to fill the equipment. Allow a 10% excess for waste.

General Comments

A stamped copy of the accepted labeling is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

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

Sincerely,

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

Attachment 2

DRAFT EPA MASTER LABEL

[All text in square brackets [AAA] is optional and may/may not be included on final label]

{All text in rounded brackets {AAA} is for information purposes and will not appear on final label}

{Front panel}

**PACE® CONCENTRATED POOL
CHLORINATING STICKS**

Active Ingredient:

Trichloro-s-Triazinetrione	99%
Other Ingredients	1%
Total	100%
Available Chlorine	90%

KEEP OUT OF REACH OF CHILDREN

DANGER

Contamination or Improper use may cause fire or explosion. Do not contaminate with any foreign matter, including other pool treatment products. Add only into water. Read all precautionary statements on back label and first aid statements before use.

FIRST AID: {Format consistent with PR Notice 2001-1}

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 SWALLOWED: Call a 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then gives artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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

IN CASE OF EMERGENCY CALL: 1-800-654-6911.

Net Wt. 50 Lbs

EPA Reg. No. 1258-853 EPA Est. No. 69470-WV-2

Arch Chemicals, Inc.
501 Merritt 7
Norwalk, CT 06856

MADE IN THE USA

[HTH®], [Sock It®], [Super Sock It®] and [ph Plus®] (brand name) are registered trademarks of Arch Chemicals, Inc.

ITEM NO. 30979

- {1258-853}
- {MARKETING CLAIMS}
- {Statements available to all labels}
- {90% Available chlorine}
- {Concentrated chlorinator for routine use}
- {Kills bacteria, destroys organic contaminants and controls algae}

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

MAR - 3 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1258-853

{1258-853}

- [Kills algae]
- [Totally soluble]
- [Slow dissolving]
- [Convenient 1 - week dosage]
- [Chlorinates up to 1- week]

- {Optional statements for use only with swimming pool sanitization directions}
- {For routine use in automatic feeders, floaters and plastic skimmers}
- {One stick treats 10,000 gallons}
- {Sanitizes pool water}
- {Swimming pool sanitizer}
- {Sun protected for extended chlorine life}
- {Sun resistant for extended chlorine life}
- {Good for all pool surfaces}

{1258-853}

{back or side panels}

PRECAUTIONARY STATEMENTS - HAZARDS TO HUMANS AND DOMESTIC ANIMALS - DANGER:
 Corrosive: Causes irreversible eye damage and skin burns. May be fatal if absorbed through skin. May be fatal if inhaled. Do not breathe dust or spray mists. Irritating to nose and throat. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, protective clothing and rubber gloves when handling this product. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

CHEMICAL HAZARDS: DANGER. Strong oxidizing agent. Add only into water. Use only clean dry utensils to dispense this product. Do not use this product in a container or dispensing device that has been used with any other product. Keep all foreign matter, including other pool treatment products, away from this product. Do not allow to become wet or damp before use. Contamination may start a chemical reaction that can give off heat and hazardous gases and may cause a fire or explosion. Do not touch this chemical with a flame or burning material (like a lighted cigarette).

{Environmental hazards statement for end-use products in containers \geq 5 gallons (liquid) or \geq 50 pounds (solid, dry weight)}

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, ponds streams 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 authorities. For guidance contact your State Water Board or Regional Office of the EPA.

{Environmental hazards statement for end-use products in containers less than 5 gallons (liquid) or less than 50 pounds (solid, dry weight)}

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

STORAGE & DISPOSAL: Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame. Do not reuse empty container. Rinse empty container thoroughly with water to dissolve all material and discard container in trash. For disposal of a contaminated or decomposing product, see Emergency Handling.

EMERGENCY HANDLING: In case of contamination or decomposition - Do not reseal container. Immediately remove container to an open and well-ventilated outdoor area by itself. Flood with large amounts of water. Dispose of the container and any remaining contaminated material in an approved landfill area.

{Use 1}[[Swimming Pools]

Why You Should Use This Product: [HTH®] (brand name) cleaning sticks are formulated to protect against chlorine loss in direct sunlight and can be used in floaters, feeders or skimmers. These convenient and

easy to use sticks are designed to dissolve slowly providing a steady source of available chlorine (up to one week) for complete swimming enjoyment in your pool. For crystal clear pool water, follow our 4 step pool {1258-853}

care program: Step 1: Test and adjust pool water balance, Step 2: Chlorinate and clarify, Step 3: Shock treat your pool at least once a week, and Step 4: Add algaecide regularly.

Always use [HTH/HTHPOOLIFE] (brand name) Shock products for regular shock treatment. Additional shocking to keep water clean and clear is recommended after: rain and heavy winds; high number of swimmers; increased water temperature; and/or increased frequency of pool usage.]

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

READ ALL PRECAUTIONARY STATEMENTS BEFORE USE.

[This concentrated 8 ounce stick is designed to dissolve slowly, providing a steady source of available chlorine in swimming pools to control the growth of algae, kill bacteria and destroy organic contaminants. Reentry into treated swimming pool is prohibited above levels of 4 ppm of chlorine.

How To Use: For best results use an automatic chlorine feeder, or floating dispenser designed for this product, or place this product in the skimmer basket. Use only in a new chlorinating device or any device, which has previously contained only products whose active ingredient is trichloro-s-triazinetriene. If placed in skimmer, run the pump a minimum of eight hours daily. DO NOT reuse floaters or feeders from other dry chlorinating products. DO NOT permit tablets to contact plastic pool linings or metal objects. DO NOT throw tablets directly into pool. DO NOT use with any other tablets or sticks in the same skimmer, floater or feeder. DO NOT use in any chlorinating device, which has been used with other chlorinating products.

WATER BALANCE: To provide optimum product performance, swimmer comfort and crystal clear water, always maintain pH from 7.2 to 7.6, total alkalinity from 60 to 120 parts per million (ppm) and calcium hardness above 200 ppm. Test frequently using a reliable test kit that measures all of the above ranges. Make any necessary adjustments promptly with appropriate products.

OPENING YOUR POOL: Balance pool water, shock treat or super chlorinate with a HTH shock product, follow label directions. Stabilize your pool water using HTH stabilizer and conditioner. Then follow "ROUTINE CHLORINATION directions.

For best results [during the season], follow [our] [the [HTH (HTH Poolife)] (brand name)] 4 step pool care program [outlined below].

ROUTINE CHLORINATION: For best results, see Water Balance section above before treatment. Add one 8 ounce stick for each 10,000 gallons of pool water every week or as needed to maintain chlorine residual of 1 to 4 ppm free available chlorine (FAC). Follow METHOD OF APPLICATION. Maintain water as stated; see WATER BALANCE. The dosage may vary depending upon bather load, water temperature and other conditions. Pool should not be entered until the chlorine residual is 1-4 ppm as measured by a reliable test kit. As a preventative treatment, you should shock treat the pool with a shock product weekly to burn out organic material and to keep water sparkling clear. Use a shock product.

SHOCK TREATMENT: In the case of algae, colored water, unpleasant odors, burning eyes, excess bather load, heavy rains and winds, or high temperatures, shock treat or super chlorinate with your preferred HTH (HTH POOLIFE) (brand name) pool shock product. Follow label directions of shock product. For best results, see Water Balance section above before treatment. Adjust pH to 7.2 to 7.6 with [pH plus] or [pH minus] (brand name) per label directions. Shock treat weekly with a product such as [Sock It], [Super Sock It], or [HTH Shock] (brand name) to kill bacteria, control algae, burn out organic material and to keep water sparkling clear. Follow label directions. Do not re-enter pool until the free available chlorine residual is 1 to 4 ppm.]

[ALGAE CONTROL: If pool surface develops algae or feels slippery, follow shock treatment directions. Immediately after shock treatment thoroughly clean pool by scrubbing surface of algae growth, vacuum and cycle through filter. If necessary, repeat the procedure. Pool should not be entered until the chlorine residual is 1-4 ppm.]

{ALGAE CONTROL:} For preventative algae control, use your preferred [HTH (HTH Poolife)] (brand name) algaecide product regularly.]

{1258-853}

[[HTH] [HTH POOLIFE] (Brand Name) HELPLINE

[866-HTH-POOL] [866-4-POOL-FUN]

[Toll Free

Call 7 days a week with your questions concerning pool water care. 8:00 a.m. - 10:00 p.m. Eastern Time]

[Visit HTH Pools: www.hthpools.com]

[Visit HTH Poolife: www.hthpoolife.com]

{Use 2} [For Use in Industrial Recirculating Water Cooling Towers, Air Washers & Evaporative Condensers.

Treatment with this product is an effective way to control the growth of bacterial and algae in industrial recirculating water cooling towers, air washers and evaporative condensers.

[Air Washers - For use only in industrial air washer systems that maintain effective mist eliminating components. Hypochlorite controls slime forming bacteria and fungi in air washer systems. This product may be added to the system either continuously or intermittently or as needed. The frequency of feeding and duration of the treatment will depend on the severity of the problem.]

1. Badly fouled systems should be cleaned prior to initiating treatment.
2. Initial Dosage - When the system is just noticeably fouled, add 8 oz. of this product per 10,000 gallons of water contained in the system. Repeat this dosage, if necessary, until free available chlorine level (FAC) of 0.5 - 1.0 ppm is obtained (as determined by use of a reliable test kit).
3. Maintenance Dosage - To obtain a FAC of 0.5 - 1.0 ppm, add 0.8 - 1.6 oz. of this product per 10,000 gallons of water daily or as needed.
4. This product should be added to the system at a point where adequate flow is maintained. Variations in water temperature, chlorine demand and flow rate will affect the dissolution rate. Warmer seasons may require an upward adjustment of the FAC.]

{Use 3} [For Use In Sewage Treatment

1. **Disinfection of Effluents** - Disinfection by chlorination or hypochlorination does not occur instantaneously. A suitable detention basin must be provided to expose the sewage effluent to the effects of this product for a sufficient period of time (usually a minimum of 15 minutes). Where mechanical stirring or other agitation is not present, chlorination for disinfection should be introduced before primary or secondary sedimentation treatments, if these are used.

The amount of product solution required will vary, depending on the concentration and conditions of the final effluent. The sewage should be treated before it has reached a septic state. Experiments indicate that about 30% of the chlorine demand of raw sewage is attributed to settle solids; 40% to suspended and colloidal solids; and 30% to dissolve solids.

Whenever possible, disinfection should be controlled by laboratory checks. Disinfection can be achieved when the chlorine residual (after 15 - 30 minutes contact time) is between 0.6 and 1.0 ppm. Experience with different types of treated sewage will generally establish a relationship between the residual chlorine content of the final effluent and the contact time necessary to insure the desired bacteriological results, after which the residual chlorine and time of contact may be made the controlling factors for operation. Occasional bacteriological checks should be practiced as a safeguard.

Hypochlorinators used to treat sewage in small communities should always be located near the influent of the detention basin. To conform to the requirements mentioned above, the feed rate must be adjusted to the higher dosages usually required for sewage practices. In cases where sewage is to be temporarily disinfected before being diluted in a body of water, the following conditions will usually provide satisfactory protection against pollution of receiving waters: (a) Raw sewage, 10 - 30 ppm available chlorine. (b) Primary treated sewage, 5 - 20 ppm available chlorine. (c) Sewage which has undergone primary and secondary treatment, or secondary alone, 2 - 5 ppm. Bacteriological tests should be made frequently as a safeguard. The available chlorine level in the discharge effluent should be between 0.6 and 1.0 ppm or in accordance with an NPDES permit. For guidance, contact the regional office of EPA.

2. Slime Control - When ponding of the filters is excessive, stoppage of the distributing filter can occur. The continual feeding of a hypochlorite solution into the effluent at a point above the filter nozzles will clean the filter satisfactorily. Dosages will depend on the amount of excess slime accumulated on the nozzles and filter stone. Extreme cases may require dosages as high as 10 ppm available chlorine. Once the desired cleaning has been achieved, an intermittent application of hypochlorite solution to the dosing tanks, just ahead of the filter, is usually successful. The amount and frequency of the dosage needed to give satisfactory continuous operation of the trickling filters depends on the severity of the microbiological problem.

In activated sludge plants, "bulking sludge" can be caused by the presence of slime which interrupts proper settling. A solution of hypochlorite introduced at some point on the return sludge line can be an effective control measure. Normal dosage rates are 2 -8 ppm available chlorine.

3. B.O.D. Reduction - The condition can usually be avoided by applying a solution of hypochlorite to the effluent until a substantial residual is obtained. Application should be made at a point which will permit 10 - 20 minute contact time prior to the discharge of the effluent into the stream. A dosage which leaves a residual available chlorine of about 0.2 ppm after a contact time of at least 10 minutes, will afford a reduction of about 1/3 of the effluents B.O.D. Where more permanent or greater B.O.D. reduction is necessary dosing to higher available chlorine residuals is recommended.

4. Coagulation and Sedimentation - A great deal of the finer divided suspended matter and most of the colloidal matter in sewage does not readily respond to plain sedimentation. The job of removing substantial portions of this kind of matter is usually accomplished either by chemical precipitation, by filtration, or by the use of both processes. Research has proven that pre-hypochlorination will improve sedimentation and coagulation in sewage treatment operations.

5. Treating Effluent from Mobile Sewage Treatment Units - Only human waste, toilet paper and water should enter the mobile sewage treatment unit. Solids are retained in the unit for later removal, while the liquid portion is filtered, disinfected and discharged. Product is placed in a flow-thru container where the liquid effluent passes over them before being discharged.

Disinfection by chlorination or hypochlorination does not occur instantly and a suitable detention basin must be provided to expose the sewage effluent to the effects of this product for a sufficient period of time (usually a minimum of 15 minutes). Tests should be made frequently as a safeguard. The available chlorine level in the discharge effluent should be between 0.6 and 1.0 ppm or in accordance with an NPDES permit. For guidance, contact the regional office of EPA.]

{Use 4} [For Use Throughout Food & Beverage Processing and Food Handling Operations.

This product is recommended for sanitization of all types of non-porous equipment and utensils used in Food Processing & Caning Plants, Bottling Plants & Breweries, Fish Processing Plants, Meat & Poultry Processing Plants, Milk Handling & Processing Plants, Restaurant & Institutional Dining Establishments and Poultry Houses.

Prior to sanitization, food particles and soil must be removed by a pre-flush or a pre-scrape, or where necessary, by a pre-soak. Surfaces or objects must be washed with a good detergent or cleaner and rinsed with potable water.

Use 1 ounce of this product to 67 gallons of water (100 ppm available chlorine) to sanitize previously cleaned processing and packaging equipment. Allow at least a one minute contact time before draining. Allow adequate draining and air dry before contact with beverages or food.

To control the growth of bacteria in brewery pasteurizers, badly fouled systems should be cleaned before treatment. When the system is just noticeably fouled, add 8-10 ounces of this product per 10,000 gallons of water contained in the system. Repeat this dosage if necessary until a free available chlorine level (FAC) of 0.5-1.0 ppm is obtained (as determined by use of a reliable test kit). To maintain an FAC of 0.5-1.0 ppm, add 1 - 2 ounces of this product per 10,000 gallons of water, daily or as needed. This product should be added to the system at a point where adequate flow is maintained.

Methods of Application of Solutions of This Product - All sanitizing solutions should be freshly prepared. Solutions should be tested during use to make sure the concentration does not drop below the

recommended level. Keep in properly labeled containers to protect against contamination. Unused solutions should be discarded.

{1258-853}

For mechanical operations, the solution may not be re-used for sanitizing but may be used for other purposes such as cleaning.

Clean-in-Place Method of Sanitizing Equipment - This method is commonly used to sanitize closed systems, such as fluid milk cooling and handling equipment. It is also appropriate for sanitizing weigh tanks, coolers, short-time pasteurizers, pumps, homogenizers, fillers, sanitary piping and fittings, and bottle and can fillers.

First, clean all equipment thoroughly, immediately after use. Then place back in operating position.

Prepare a solution containing 100 ppm available chlorine (1 oz. of product per 67 gallons of water) in a volume sufficient to fill the equipment. Allow a 10% excess for waste.

Pump the solution through the system until it is filled and air excluded. Close final drain valves and hold under pressure for two minutes to insure proper contact with all surfaces. Then drain the solution.

[Coarse] Spray method of Sanitizing Equipment - The [coarse] spray method is generally used to sanitize large, non-porous surfaces that have already been freed of physical soil. It is appropriate for batch pasteurizers, holding tanks, weigh tanks, tank trucks and cars, vats, tile walls, ceilings and floors.

Prepare solution containing 100 ppm available chlorine (1 oz. of product per 67 gallons of water). If possible, use pressure spraying equipment designed to resist chlorine-containing solutions (e.g. rubber-coated, plastic or stainless steel). When using any other kind of spraying equipment, be sure to empty and rinse thoroughly with fresh water immediately after treatment.

Apply spray heavily to all surfaces the product will touch. All treated surfaces, corners and turns should be thoroughly sprayed. Allow at least a one minute contact time before draining. Allow excess solution to drain off thoroughly, then place in service.

General Rinse Method - A solution of this product containing 100 ppm available chlorine (1 oz. of product per 67 gallons of water) will sanitize plant floors, walls and ceilings, and also control odors in refrigerated areas and drain platforms.

Flush or swab surfaces generously with the solution. After two minutes contact time allow solution to drain thoroughly.]

{Use 5} [Egg Processing Plants

To clean egg shells, spray with a solution containing 1 ounce of this product per 67 gallons of water (100 ppm available chlorine) at 90°F to 120°F. Spray-rinse the cleaned eggs with warm potable water.

To destain egg shells, immerse the eggs in a solution containing 100 ppm available chlorine (1 oz. of product per 67 gallons of water) at 90°F to 120°F. After destaining, the eggs must be cleaned by spraying with an acceptable cleaner. Follow with potable water rinse.

For shell egg sanitizing, thoroughly spray only clean, whole eggs (dirty, cracked or punctured eggs cannot be sanitized) with warm (not exceeding 130 deg. F.) potable water containing 100 ppm available chlorine (1 oz. of product per 67 gallons of water). Eggs that have been sanitized with this chlorine compound may be broken for use in the manufacture of egg products without a prior potable water rinse. Eggs should be reasonably dry before casing or breaking. Do not reuse the solution for sanitizing eggs.

All egg cups, breaking knives, trays and other equipment that come into contact with "off" eggs should be thoroughly cleaned and sanitized. First, clean all equipment. Before placing back in use, spray with a solution containing 100 ppm available chlorine (1 oz. of product per 67 gallons of water). Allow at least a one minute contact time and allow surfaces to drain thoroughly before contact with egg products.

To sanitize egg freezers and dryers (tanks, pipelines and pumps), use the [coarse] spray method of treatment. This procedure is generally used to sanitize large, non-porous surfaces that have already been

freed of physical soil. Prepare a solution containing 100 ppm available chlorine (1 oz. of product per 67 gallons of water). Apply spray heavily to all surfaces the eggs will touch. All treated surfaces, corners and turns should be thoroughly sprayed. Allow at least a one minute contact time before draining. Allow equipment to drain adequately before contact with eggs.]