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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460

January 25, 2008

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mark E. Burt Regulatory Manager Arch Chemicals, Inc. 1955 Lake Park Drive Suite 100 Smyrna, GA 30080

Subject:

Pace Spa & Hot Tub Chlorinator

EPA Registration No. 1258-1042 Application Date: December 6, 2007 Receipt Date: December 7, 2007

Dear Mr. Burt:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with the comments listed below:

- Addition of optional marketing statements
- Addition of optional advisory statements
- Revisions to comply with Container Regulations in subpart H Container Labeling §156.140
- Addition-of "responsible-care" symbol-as-advisory-statement.

Comments

- 1. The revised labeling to comply with Container Regulation in Subpart H and additional marketing statements are acceptable.
- 2. The optional advisory statements and responsible care symbol are being reviewed by the Agency's Program Labeling Committee. The Agency cannot grant approval for the advisory statements and graphic symbol at this time.

General Comments

A stamped copy of the labeling, accepted with comments, is enclosed. Submit 1 copy of your final printed label before distributing or selling the product bearing the revised labeling.

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

Sincerely,

Emily H. Mitchell Product Manager (32) Regulatory Management Branch II Antimicrobials Division (7510P)

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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 SPA & HOT TUB CHLORINATOR

Active Ingredient:

Sodium Dichloro-s-Triazinetrione Hydrated

Total

99%

Other Ingredients

1%

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100%

Available Chlorine

55%

KEEP OUT OF REACH OF CHILDREN

DANGER

Contamination or improper use may cause fire or explosion or the release of toxic gases. Do not allow product to contact any foreign matter, including other water treatment products. If product is exposed to small amounts of water, it can react to cause explosion or the release of toxic gases. Do not mix this product with a small amount of water. Only add directly to your pool or spa. Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled. Harmful if swallowed or absorbed through skin.

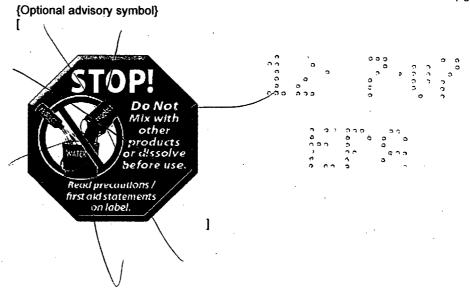
Read all precautionary statements on back label and first aid statements before use.

Net Wt. xx

Arch Chemicals, Inc. Smyrna, GA 30080

EPA REG. NO. 1258-1042 EPA EST. NO.

[HTH®] [PACE®] [Sock It®], [Super Sock It®] and [pH Plus®] [BRAND] are REGISTERED TRADEMARKS OF ARCH CHEMICALS, INC.



ACCEPTED with COMMENTS EPA Letter Dated:

JAN 25 2008

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1258-1042

{MARKETING CLAIMS}

{Optional statements for use only with spa/hot tub sanitization directions}

[55% Available Chlorine]

[Kills bacteria, controls algae and destroys organic contaminants]

[Dissolves completely with no residue]

[No residue]

[No sediment]

[Fast Acting]

[Fast dissolving with no residue]

[Sun protected for extended chlorine life]

[Restores crystal clarity in spa and hot tub water]

[Maintains crystal clarity in spa and hot tub water]

[Protects against odor]

[Controls bacteria and algae]

[Sanitizes and disinfects spa water]

{back or side panel}

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 give 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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled. Harmful if swallowed or absorbed through the skin tritating to nose and throat.

- Open in a well ventilated area. Do not breathe dust or fumes.
- Do not get in eyes, on skin, or on clothing.
- Wear goggles and rubber gloves when handling this product. For additional protection of skin, wear long sleeves and long pants.
- Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

· Remove and wash contaminated clothing before reuse.

PHYSICAL and CHEMICAL HAZARDS:

DANGER. If product is exposed to small amounts of water, it can react to cause explosion or the release of toxic gases. Do not add water to this product. Add only into water.

Do not allow to become wet or damp before use.

Can react with other materials, including other water treatment products, to cause fire, explosion, and the release of toxic gases.

- Keep all foreign matter, including other water treatment products, away from this product.
- · Do not mix with other products or dissolve before use.
- Do not use this product in a floater or feeder that has been used with any other product. If used with a skimmer, make sure skimmer is completely free of residue from other water treating products before putting this product in a skimmer.

Strong oxidizing agent. This product can increase fire intensity.

 Keep away from heat and from flame and 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 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 this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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

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

STORAGE & DISPOSAL: {Optional statements – usage depends on whether or not refillable or nonrefillable containers are used and whether or not product is packaged for household/residential use only}

{Nonrefillable container - household/residential use}

[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. Nonrefillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. Do not contaminate food or feed by storage or disposal or cleaning of equipment. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY HANDLING.]

{Refillable container - household/residential use}

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[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 contaminate food or feed by storage or disposal or cleaning of equipment. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY HANDLING. Refillable container. Refill this container with Sodium Dichloro-s-Triazinetrione Hydrated only. Do not use this container for any other purpose. Rinse empty container thoroughly with water to dissolve all material prior to disposal.]

{Nonrefillable container - non-household/residential use}

[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 contaminate food or feed by storage or disposal or cleaning of equipment. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY I HANDLING. Nonrefillable container. Do not reuse this container. Offer for recycling if available. Rinse empty container thoroughly with water to dissolve all material prior to disposal.]

{Refillable container - non-household/residential use}

[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 contaminate food or feed by storage or disposal or cleaning of equipment. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY HANDLING. Refillable container. Refill this container with Sodium Dichloro-s-Triazinetrione Hydrated only. Do not use this container for any other purpose. Cleaning of this container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. Rinse empty container thoroughly with water to dissolve all material prior to disposal.]

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.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Re-entry into treated spas[/tubs] is prohibited above levels of 5 ppm free residual chlorine.

READ ALL PRECAUTIONARY STATEMENTS BEFORE USE.

WHY YOU SHOULD USE THIS PRODUCT: This product is an effective sanitizer and shock that protects water against chlorine loss optimizing usage and comfort with no sediment. This product is convenient and easy to use to control the growth of algae, kill bacteria and destroy organic materials. [For crystal clean [clear] water with no sediment, follow our 4 step care program: Step 1: Test and adjust water balance, Step 2: Chlorinate and clarify, Step 3: Shock treat at least once a week, and Step 4: Add algaecide regularly.]

(Spa & Hot Tubs

How To Use: For best results, see "WATER BALANCE" section below before treatment. Maintain these conditions for proper operation by frequent testing with a test kit. Do not allow cyanuric acid level to exceed 100 ppm. It is recommended that spas

and hot tubs be drained every 30-90 days, more often under heavy use. Consult manufacturer's recommendations concerning the compatibility of chlorine sanitizers with their equipment. Some oils, lotions, fragrances, cleansers, etc., may cause foaming or cloudy water and may react with chlorine sanitizers to reduce their efficacy. If circulation is low, stir water after addition of chlorine or other chemicals. [Do not premix this product.] [Only add this product directly to your spa or hot tub.] {When contents are in a resealable container} [Use only a clean, dry [scoop] lid to measure this product]. [Do not use the [scoop] [lid] for any other purpose.]

Water Balance: For best product performance, comfort, and crystal clear water: Maintain pH in the range of 7.2 to 7.8. Maintain total alkalinity in the range of 80 to 120 parts per million (ppm). Maintain calcium hardness above 200 ppm. Use a reliable test kit that measures all these ranges. Use [BRAND] [Spa Care Products] to make adjustments. Follow label directions for each product.

Startup (Freshly Filled): For best results, see "WATER BALANCE" section above before treatment. Turn on circulation system and ensure that it is operating properly. Add 1.2 ounces of this product for each 500 gallons of water. Check the free available chlorine (FAC) and if less than 3-5 ppm, repeat as needed.

Routine Chlorination For Regular Use: For best results, see "WATER BALANCE" section above before treatment. Turn on circulation system and ensure that it is operating properly. Scatter 0.4-0.6 ounces of this product per 500 gallons over the surface of the water. Test for free available chlorine and add additional product if necessary to maintain 3-5 ppm FAC. Maintain 3-5 ppm FAC while unit is in use.

Shock Treatment: After each use, shock treat with 1.2 ounces of this product per 500 gallons of water, to control odors and algae. Repeat as needed. Do not enter water until FAC is 3-5 ppm.

Algae Control: Shock treatment should control algae. However, if problems persist, use your preferred [BRAND] [spa] algaecide product regularly. Follow label directions on the algaecide.

Extended Non-use Period: For best results, see "WATER BALANCE" section above-before treatment. During extended non-use periods when the unit is not being use add 1.2 ounces of this product per 500 gallons twice a week with the circulation system running or as needed to maintain 3-5 ppm free available chlorine.]