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Garrett B. Schifilliti Olin Corporation 350 Knotter Drive Cheshire, CT 06410

Subject: HTH® Extra Strength Dry Chlorinator Tablets for Sparkling Clear Pool Water

EPA Registration No. 1258-1171 Your Amendment Dated June 8, 1992

Dear Mr. Schifilliti:

This is in response to your label modification submitted in response to PR Notice 91-7.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is not acceptable, for the reasons given below.

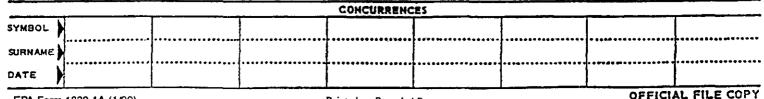
- 1. The ingredients statement should indicate 75% for the active ingredient.
 - 2. A net contents statement must appear on the label.

Submit five (5) copies of revised labeling incorporating the above comments.

We have no objections to the proposed new primary brand name "HTH® Tablets 75." However, this will not become the primary brand name of record until it appears on an EPA-accepted label.

Note that very soon, at the time of reregistration of hypochlorite products, you will be required to place the statement of Practical Treatment (First Aid) on the front panel, and to use the following text for the Environmental Hazards section:

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 this product is specifically identified and addressed in an NPDES permit. 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.

If you have any questions about these comments, you may call Wallace Powell at 703-305-6938.

Sincerely,

Ruth G. Douglas Product Manager (32)

Antimicrobial Program Branch Registration Division (H-7504C)

Enclosure

HTH TABLETS 75

KEEP OUT OF REACH OF CHILDREN

DANGER!

CONTAMINATION MAY CAUSE FIRE
MIX ONLY INTO WATER
SEE PRECAUTIONARY STATEMENTS AND
FIRST AID INFORMATION ON BACK PANEL

DANGER

FIRE OR EXPLOSION COULD RESULT FROM IMPROPER USE

Do not use HTH TABLETS in any feeder, floater, skimmer or other chlorinating device in which any other chlorinating compound has been used.

ACTIVE INGREDIENT:
CALCIUM HYPOCHLORITE....65%
INERT INGREDIENTS.....35%
AVAILABLE CHLORINE......65%

EPA REG. NO. 1258-1171

EPA EST. NO. 1258-TN-1

ACCEPTED
with COMMENTS
in EPA Letter Detect:

28 AUG 1992

Under the Fectoral importants for the posticide, and linderstands for the posticide amended, for the posticide registered under EPA Res. No.

*CONTROLS ALGAE

*KILLS BACTERIA

*DESTROYS ORGANIC CONTAMINANTS

OLIN CORP. 120 LONG RIDGE RD. STAMFORD, CT. 06904

READ THE PRECAUTIONARY STATEMENTS BEFORE USE.

Do not mix this product with any chemicals including other pool sanitizers. Do not use tablets in any chlorinating device that has been used with other chlorinating compounds. Even if empty, residue left behind may react and cause fire or explosion. Do not throw tablets directly into pool. Use this product in a floating dispenser or plastic leaf strainer in the surface skimmer. Do not use in an automatic chlorinator unless recommended by the manufacturer. Crushing tablets is not recommended. Failure to comply may result in fire or explosion.

DIRECTIONS FOR POOL USE: It is a violation of federal law to use this product in a manner inconsistent with its labeling. HTH Tablets are designed to dissolve slowly providing a steady source of available chlorine to control algae growth and effectively kill bacteria.

FOR BEST RESULTS: Add tablets to a floating dispenser or place in skimmer basket. Measure dosage using only clean, dry bottle cap or provided scoop. Do not use another measuring device or use cup or cap for any other purpose. Four tablets weigh approximately 1 oz. Add tablets during evening hours while the filter pump is running. To provide maximum product performance, swimmer comfort and crystal clear water, always maintain pH in the 7.2-7.6 range, total alkalinity in the 60-100 parts per million (ppm) range and calcium hardness above 200 ppm. Use a reliable test kit that measures all these ranges. Make necessary adjustments with the appropriate HTH Pool Care Products.

OPENING YOUR POOL: Adjust pool water pH to 7.2-7.4. Follow 'Shock Treatment' directions below. Allow 30 minutes for product to disperse and test chlorine residual with a pool test kit. Repeat dosage, as needed, until chlorine residual is 1 to 3 ppm.

ROUTINE DOSAGE: Through the pool season, adjust pH to 7.2-7.6 and add 6 to 8 oz. (24 to 32 tablets) of this product per 5000 gallons pool water daily or as often as needed to maintain chlorine residual at 1-3 ppm. If you have stabilized your pool using HTH Stabilizer/Conditioner (or similar product), add 3 to 4 oz. (12 to 16 tablets) per 5,000 gallons every other day or as often as needed to maintain chlorine residual at 1-3 ppm.

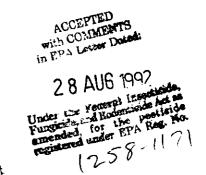
As a preventative treatment, shock treat once per week to prevent pool problems.



In addition to weekly shock treatment, you should shock treat to remedy problems which may occur when bathing loads are high, water appears hazy or dull, unpleasant odors or eye irritation occur, after heavy wind and rainstorms, or if algae does develop with resulting green color and slimy feeling.

SHOCK TREATMENT: In case of algae, colored water, unpleasant odors or burning eyes, adjust pH and add 16 ounces (64 tablets) per 10000 gallons of water. Add tablets to a floating dispenser or place in skimmer basket. Be sure that no other chemicals or tablets are present in the floater or skimmer. Run filter until product is dissolved then scrub algae with brush and vacuum. Allow filtering for 24 hours. Repeat treatment the following day if needed. Do not enter pool until chlorine residual is at 1-3 ppm.

POOL CAPACITY	START UP & SHOCK TRTMR.	ROUTINE STABILIZED	DOSAGE UNSTABILIZED
5000 GAL	8 OZ	1.5 OZ	3-4 OZ
10000 "	16 "	3 "	6-8 "
15000 "	24 "	4.5 "	9-12"
20000 "	32 "	6 11	12-16"
25000 "	40 "	7.5 "	15-20"



OTHER USES: Ask your HTH pool chemical supplier or write to Olin Corp. for specific literature on other accepted uses.

TO DETERMINE YOUR POOL CAPACITY IN U.S. GALLONS, USE THE APPROPRIATE FORMULA BELOW:

POOL SHAPE FORMULA (Use measurements in feet only)

RECTANGULAR LENGTH X WIDTH X AVERAGE DEPTH X 7.5 = TOTAL GALLONS

ROUND DIAMETER X DIAMETER X AVERAGE DEPTH X 5.9 = TOTAL GALLONS

OVAL MAXIMUM LENGTH X MAXIMUM WIDTH X AVERAGE DEPTH X 5.9 = TOTAL GALLONS

FREEFORM SURFACE (SQ. FEET) X AVERAGE DEPTH X 7.5 = TOTAL GALLONS

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: Danger, highly corrosive. Causes skin and eye damage. May be fatal if swallowed. Do not get in eyes, on skin, or on clothing. Do not handle with bare hands. Wear goggles or face shield and use rubber gloves and only thoroughly clean, dry utensils when handling. Irritating to nose and throat. Avoid breathing dust and fumes. Remove and wash contaminated clothing before reuse.

FIRST AID (PRACTICAL TREATMENT): IF ON SKIN: brush off excess chemical and flush skin with cold water for at least 15 minutes. If irritation persists, get medical attention.

IF INHALED: Remove person to fresh air. Call a physician immediately.

IF IN EYES: Flush with cold water for at least 15 minutes. Call a physician immediately.

IF SWALLOWED: Drink large quantities of water. Do not induce vomiting. Call a physician immediately.

CHEMICAL HAZARDS: Danger: strong oxidizing agent. Mix only into water. Contamination may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible fire and explosion. Avoid any contact with flame or burning material, such as a lighted cigarette. Do not contaminate with moisture, garbage, dirt, organic matter, chemicals, including other pool chemicals, pool chlorinating compounds, household products, cyanuric acid pool stabilizers, soap products, paint products, solvents, acids, vinegar, beverages, oils, pine oil, dirty rags or any other foreign matter. Do not use moist or damp utensils.

ENVIRONMENTAL HAZARD: This product is toxic to fish. Do not contaminate lakes, ponds, or streams by cleaning of equipment or disposal of wastes.

STORAGE AND DISPOSAL:

Keep this product dry in a tightly closed container when not in use. Do not reuse empty container. Rinse empty container thoroughly with water to dissolve all material before discarding. Store in a cool, dry, well ventilated area away from heat or open flame. In case of decomposition, isolate container (if possible) and flood area with large amounts of water to dissolve all material before discarding this container. Place in trash collection. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

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