

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

April 16, 2012

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Leesha N. Square Regulatory Specialist Arch Chemicals Inc., Suite 1100 5600 New Northside Dr, Atlanta, GA 30328

Subject:

Enduraclean Tablets

EPA Reg.#: 1258-1244

Notification Date: March 20, 2012 Receipt Date: March 22, 2012

Dear Ms. Square:

This acknowledges the receipt of your notification, submitted under the provision of PR Notice 98-10 and FIFRA section 3(c)9.

Proposed Notification:

Addition of an optional marketing claims for "Enduraclean Tablet" (EPA Reg# 1258-1244).

<u>For all products</u> (on page 4): -4 free tablets; -Bonus Pack; -Value Pack; -[Now] 4 more weeks of sanitizer; -1 extra month of tablets; -[Now] treats 40,000 more gallons of water; -Extra Value; 4 free tablets; -Extra 1.75 pounds free; and -4% more free.

Optional Statements for Dealer Retail Brands (ON page 5): -Step 1 Sanitize [it]; -Step 1 of the POOLIFE Brite Stix System; -Step 2 Shock [it]; -Step 3 Add Pool Plus or Defend+; and -Step 1 of a 3 step system.

General Comment:

Based on the review of the material submitted, the notification application for additional marketing claims are acceptable.

This notification and this letter have been inserted in your file for future reference.

If you have further question on this letter, please contact David Liem at 703-305-1284 or by email at liem.david@epa.gov

Sincerely

Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Note to reviewer:

[Items in brackets [AAA] are optional and may/may not be included on final label] {Items in braces {AAA} are for information purposes and will not appear on final label}

ENDURACLEAN TABLETS

Active Ingredients:	
Trichloro-s-Triazinetrione	
Copper Sulfate pentahydrate*	1.5%
Other Ingredients	<u>5.0%</u>
Total	

Available Chlorine.....84%

*Metallic copper equivalent 0.38%

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. {The following optional statement is for use on residential use swimming pool and spa products} [Do not mix this product with a small amount of water. Only add directly to your pool or spa.] Do not remove floater or other dispensing device from water for more than five minutes if it contains a tablet or tablet residue.

SEE SIDE LABEL FOR ADDITIONAL PRECAUTIONS

{required on front panel}

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 five 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 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

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

1258-1244 Enduraclean Tablets EPA draft label 03-19-2012

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

DANGER: Corrosive. Causes irreversible eye burns and skin irritation. May be fatal if inhaled. VHarmful if swallowed.

- Do not get in eyes, on skin or on clothing. Wear safety goggles or face shield, and rubber gloves when handling this product. For additional skin protection of skin, wear long sleeves and long pants.
- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.
- Open in a well ventilated area. Do not breathe dust or vapor
- Remove and wash contaminated clothing and wash 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.
- Do not remove floater or other dispensing device from water for more than five minutes if it contains a tablet or tablet residue.
- 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 use this product in a floater or feeder that has been used with any other product.
- Do not allow this product to contact other water treatment products. If used with a skimmer, make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in the 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 containers less than 5 gallons (liquid) or 50 pounds (solid, dry weight) use first sentence. All others use full paragraph.}

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 into sewer systems without previously notifying the local sewage treatment plant authorities. For guidance contact your State Water Board or Regional Office of the EPA.

{Household/residential use products}

[STORAGE AND DISPOSAL

{Nonrefillable containers}

[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. If not, discard in trash. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY HANDLING.]

{Refillable containers}

[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 Trichloro-s-Triazinetrione and copper sulfate Pentahydrate only. Do not use this container for any other purpose. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. If not, discard in trash.]]

{Non-residential/non-household use products}

[STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Keep product in its tightly closed container when not in use in an area inaccessible to persons unfamiliar with its use. Store in cool, dry, well-ventilated area. Keep away from heat or open flame.

Pesticide Disposal: Pesticide waste is acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at your nearest EPA regional office for guidance.

Container Disposal:

{Nonrefillable containers}

Nonrefillable Container. Do not reuse this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Then, offer for recycling if available. If not, dispose of in a sanitary landfill or by procedures approved by state and local authorities."

{Refillable containers}

Refillable Container. Refill this container with this product only. Do not use this container for any other purpose. Cleaning 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. Then, offer for recycling if available. If not, dispose of in a sanitary landfill or by procedures approved by state and local authorities.]

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.

Sold by: ARCH CHEMICALS, INC. P.O. Box 724438 Atlanta, GA 31139-1438

[brand names] are registered trademarks of Arch Chemicals, Inc.

EPA Reg. No.	1258-1244	EPA Est.	No. Xxx
Net Wt			

{OPTIONAL MARKETING CLAIMS - all products}

[Stabilized] [and/or] [sun protected] for extended chlorine life]

[Stabilized sanitization]

[Sun resistant for extended chlorine life]

[Protects against bacteria and algae]

[Prevents bacteria and algae]

[Controls bacteria and algae] [Bacteria and algae control]

[Sanitizes pool water]

[Swimming pool sanitizer]

[Sanitizer for swimming pool and pool water] [3-in-1 Action: Sanitizes, prevents algae,

and clarifies water]

[[2-in-1] {or} [Dual] Action: Sanitizes and

prevents algae]

[Kills bacteria and destroys organic

contaminants] [Kills algae]

[Totally soluble]

[Slow dissolving]

[Precipitating agent included]

[Assists filtration] {or} [Filter aid]

[Multipurpose tablet]

[Keeps pool water clean and crystal clear]

[Produces sparkling clean swimming pool

water

[Restores clarity to pool water]

[Blue crystals for algae protection]

[Power crystals clarify pool water]

[Clarifies pool water] [Contains a clarifier]

[For [crystal clear], {or} Sparkling [blue] pool

[[Chlorine lasts {or} [Chlorinates] up to one

week]

[Regulates chlorine levels]

[Convenient one week dosage]

[Innovative, patented exclusive technology]

[84% Available Chlorine]

[Concentrated chlorinator for routine use]

[Individually wrapped for easy handling

{except 1" tablets}]

[Easy, economical, convenient to use]

[For routine use in automatic feeders,

floaters and plastic skimmers]

[One [tablet {or} [stick] treats 10,000 gallons

{except 1" tablets}]

[Good for all pool surfaces]

[For Pop-Up Pools]

[Step 1: Balance]

[Step 2: Sanitize]

[Step 3: Shock]

[Step 4: Prevent Algae]

4 free tablets

Bonus Pack

Value Pack

[Now] 4 more weeks of sanitizer

1 extra month of tablets ~

[Now] treats 40,000 more gallons of water

Extra Value

4 free tablets

Extra 1.75 pounds free

4% more free

{8 oz slow dissolving sticks}

[One stick treats 5,000 gallons]

[Controlled release]

[Slow dissolve]

[Contains CCT* {footnote} *Clear Care

Technology]]

[Controlled Delivery System]

[Controls erosion rate of product]

[Featuring ClearCare Technology]

[Multi-action sticks]

[Prevents algae]

[Chlorinates up to two weeks]

[Convenient two week dosage]

[Extended sanitization for up to 14 days]

[Softens Water]

[Protection for Pool Surfaces and

Equipment]

[Gentle on Equipment and Liners]

[Will not cause bleached liners]

[Corrosion Inhibitor]

[Prevents metal staining and corrosion]

[Sequestering Agent]

[Reduces scale formation]

[Enhanced filter performance]

[For skimmer use only]

{28 oz Supertabs only}

[Chlorinates up to two weeks] [Convenient two week dosage]

{Disposable floater containing 1" tablets}

[Can last up to one month]

[Convenient one-time use]

[Tilts when empty]

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[Treats up to 40,000 gallons]

{Universal floater cartridge containing 1" tablets}

[Can last up to one month] [For use with trichlor products] [Treats up to 40,000 gallons]

{Optional statements for Dealer Retail Brands}

Step 1 Sanitize

Step 2 Shock

Step 3 Add Pool Plus

Step 1 Sanitize [it]

Step 1 of the POOLIFE Brite Stix System

Step 2 Shock [it]

[Step 3 Add Pool Plus or Defend+] [Step 1 of a 3 step system]



{Optional } [

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

READ THE PRECAUTIONARY STATEMENTS BEFORE USE.

[This product is designed to dissolve slowly, providing a steady source of available chlorine and copper in swimming pools to control the growth of algae, kill bacteria and destroy organic contaminants.]

{all except 8 ounce slow dissolving sticks, 28 ounce supertabs, cartridges, disposable floater, universal floater}

METHOD OF APPLICATION: Use in a floating dispenser, automatic chlorinator or feeder designed for this product, or place in skimmer.

{8 ounce slow dissolving sticks; replaces above}

METHOD OF APPLICATION: Use only for skimmer chlorination. Do not use in a floating dispenser, automatic chlorinator or feeder. Run the filter pump a minimum of eight hours daily.

{28 ounce supertabs only; replaces above}

METHOD OF APPLICATION: [brand name] are super sized for extended cleaning power. These convenient and easy to use tablets are formulated to protect against chlorine loss in direct sunlight and are used in skimmer baskets. They are designed to dissolve slowly providing a steady source of available chlorine (up to 2 weeks) for complete swimming enjoyment in your pool.]

{Disposable floater containing 1" tablets only; replaces above}

METHOD OF APPLICATION: [brand] Disposable Floaters are designed for simple one time use and treat up to 40,000 gallons of pool water. The 1" tablets inside the floater are formulated to protect pool water against chlorine loss and dissolve slowly providing a steady source of available chlorine for complete swimming enjoyment in your pool.

{Universal floater cartridge containing 1" tablets; replaces above}

METHOD OF APPLICATION: [[brand] Refillable Floaters] are convenient and easy to use, treating up to 40,000 gallons of pool water. The 1" tablets inside the floater are formulated to protect pool water against chlorine loss and dissolve slowly providing a steady source of available chlorine (up to one month) for complete swimming enjoyment in your pool.

Use with [brand] floater or feeders [made by [brand]]. In a clean pool with no visible algae, follow the feeder instructions. Make sure cartridge is completely clean and free of residue from other water treatment products before putting this product in the cartridge.]

Do not allow this product to get damp or wet before use. Do not allow this product to contact other water treatment products. [Use in a new chlorinating device or any device which has previously contained only this product or trichloro-s-triazinetrione.] [When] [If] placed in the skimmer, run the filter pump a minimum of eight hours daily.

[For crystal clear pool water, follow our 4 step pool care program: Step 1: Test and balance pool water, Step 2: Sanitize, Step 3: Shock at least once a week, and Step 4: Add algaecide as directed.]

[For best results, follow a weekly program with our [brand] System. Consult your authorized [brand] dealer for advice on the system that best suits your pool and your lifestyle.] [Take a pool water sample to your authorized [brand] dealer regularly for a detailed water analysis.]

1258-1244 Enduraclean Tablets EPA draft label 03-19-2012 **DO NOT** Use in floaters or feeders that have been used with other water treatment products. Make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in the skimmer.

DO NOT Throw [tablets {or} sticks] directly into pool.

DO NOT Permit [tablets {or} sticks] to contact plastic pool linings or metal objects.

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 compounds.

DO NOT Use bare hands when handling product.

DO NOT Mix with other products or dissolve before use.

[DO NOT Pre-mix this product.] [Only add this product directly to your pool.]

[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 80 to 120 parts per million (ppm), and calcium hardness above 200 ppm. Test frequently using a [brand] test kit that measures all these ranges. Make any necessary adjustments promptly with the appropriate [brand] pool care products. Re-entry into treated pools is prohibited with chlorine levels above 4 ppm for risk of bodily injury.]

{or}

[WATER BALANCE: For best product performance, swimmer comfort and crystal clear water, use HTH pool care products to maintain the following water balance:

	Acceptable Range for Balance
рН	7.2-7.6
Total Alkalinity	80-120 ppm
Calcium Hardness	Above 200 ppm
Available Chlorine	1-4 ppm

Follow label directions for each product and allow each product to dissolve and disperse before adding additional products to the pool. Use a [brand] test kit that measures all these ranges. Re-entry into treated pools is prohibited with chlorine levels above 4 ppm for risk of bodily injury.]

ROUTINE CHLORINATION:

{3 inch tablets}

Add one tablet per 10,000 gallons of pool water every week or as often as needed to maintain a chlorine residual at 1.0 to 4.0 ppm.

{1/2 ounce 1" tablets}

Add four one-half ounce tablets per 10,000 gallons of pool water every other day or as often as needed to maintain a chlorine residual at 1-4 ppm.

{8 ounce sticks}

Add one stick per 10,000 gallons of pool water every week or as often as needed to maintain a chlorine residual at 1-4 ppm.

{8 ounce slow dissolving sticks}

Add one stick per 5,000 gallons of pool water every 2 weeks or as often as needed to maintain a chlorine residual at 1-4 ppm.

{following paragraph common to all except Disposable Floater, Universal Floater Cartridge, and 28 ounce Supertabs product designs}

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Follow "METHOD OF APPLICATION". This dosage may vary depending upon bather load, water temperature and other conditions. Pool must not be entered until the chlorine residual is 1-4 ppm as measured with a reliable test kit.

{28 ounce Supertabs only}

USE ONLY IN SKIMMERS

Ensure that the skimmer basket is free of any other chemicals, tablets, or residue prior to use. Place this product in the skimmer basket. Make sure skimmer basket is completely free of residue from other water treatment products before putting this product in the skimmer. This product is not recommended for use in vinyl-lined pools without an automatic timer on the pool pump. Pump should run a minimum of 8 hours per day, otherwise vinyl liner damage may occur. If chlorine residual goes above 4 ppm, reduce skimmer flow rate or daily pump operation time. If chlorine residual goes below 1 ppm, increase skimmer flow rate or daily pump operation time.

{Disposable floater containing 1" tablets only}

Do not attempt to open or refill this cartridge. Do not completely submerge cartridge. Do not mix with other products or dissolve before use.

- 1. To provide optimum product performance, swimmer comfort and crystal clear water, always maintain pH from 7.2 to 7.6, total alkalinity from 80 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. Adjust with appropriate product.
- 2. Shock treat with appropriate product [brand]. Follow label directions.
- 3. If water is unstabilized, stabilize with appropriate product [brand]. Follow label directions.
- 4. This product is marked in gallon increments from 5,000 to 40,000 gallons. To use this cartridge, punch out all feeder holes on both sides of cartridge up to and including the one corresponding to your pool's size. If pool is between sizes marked, punch out next higher hole. Make sure holes are punched out to allow free water flow through cartridge.
- 5. Punch out vent holes on both sides of cartridge. Place cartridge in pool. An eyelet has been provided on the cartridge so that you may secure it in the middle of the deep end of the pool if you desire.
- 6. Maintain free chlorine residual between 1-4 ppm. If chlorine is too low, punch out an additional hole on each side of the cartridge. If the chlorine is too high, seal one hole on each side of the cartridge with waterproof plastic tape.
- 7. The cartridge will float on its side to indicate the need for replacement. DO NOT ATTEMPT TO OPEN OR REFILL THIS CARTRIDGE!

Universal floater cartridge containing 1" tablets only}

Use with [[brand] floater] {or} [feeders made by [brand]]. In a clean pool with no visible algae, follow the feeder instructions. Make sure cartridge is completely clean and free of residue from other water treatment products before putting this product in the cartridge.]

IFOR USE IN FLOATER:

- 1. Cut off the air vent that sticks out at top of cartridge.
- 2. Punch a hole through the lowest indentation on each side of the cartridge and insert into the floater. Do not punch holes in bottom. If more chlorination is needed, punch as many holes as needed on each side starting at the lowest indentation and working up, until the pool's free chlorine residual reaches 1 4 ppm.]

[FOR USE IN E-Z CHLOR FEEDER:

1. Do not cut off the air vent at the top of the cartridge.

2. Punch all indentations on the bottom of the cartridge. Two cartridges may be needed to treat a pool of 30,000 gallons or more.

3. Make sure that the screw lit is on tight.

4. Punch a hole through the lowest indentations on three sides of the cartridge.

5. Insert cartridge into feeder. If more chlorination is needed, punch more holes on each side of the cartridge starting at the lowest indentation and working up until the free available chlorine residual remains within the range of 1 - 4 ppm.]

IFOR USE IN GUARDEX FEEDER:

1. Cut off the air vent that sticks up near the top of the cartridge.

2. Punch a hole through the lowest indentations up to watermark on three sides of the cartridge. Two cartridges may be needed to treat a pool of 30,000 gallons or more.

3. Insert the cartridge in the feeder, adjusting the cartridge height until the free available chlorine in the pool remains within the range of 1 - 4 ppm.]

[TO REFILL CARTRIDGE: 1. Remove absorbent package from cartridge before reuse. This packet is not required for pool care. 2. Fill cartridge with 4 lbs. of [[brand] Trichlor 1 inch Tablets]. DANGER – Use only [[brand] Dry Chlorinator Tablets].

{all following items common to all product designs} | SHOCK TREATMENT:

[As a preventative treatment, you must shock treat your pool once per week to prevent pool problems. In addition to weekly shock treatment, you must 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.]

Adjust pH to 7.2 to 7.4 with [[brand] pH Plus or [brand] pH Minus] per label directions. Shock treat weekly [with a product such as [brand]] to kill bacteria, control algae, burn out organic material and to keep water sparkling clear. Follow label directions.]

[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 must not be entered until the chlorine residual is 1-4 ppm.]

OPENING YOUR POOL: Balance pool water, shock treat, and stabilize your pool [using [brand] Stabilizer and Conditioner]. Then follow "ROUTINE CHLORINATION" directions.

[TO DETERMINE YOUR POOL CAPACITY IN U.S. GALLONS, USE THE APPROPRIATE FORMULA BELOW: (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 AREA (SQ. FEET) X AVERAGE DEPTH X 7.5 = TOTAL GALLONS]