

1258-1278

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

August 17, 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

John R. French, Ph.D.
Senior Regulatory Manager
Arch Chemicals, Inc. Suite 1100
Atlanta, GA 30328

Subject: PRIA (D-447123)
AW34
EPA Registration No. 1258-1278
Application Dated: March 25, 2011
Receipt Dated: April 14, 2011

Dear Dr. French:

This acknowledges the receipt of your Amendment application dated March 25, 2011 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with conditions and comments listed below.

Submission and Proposed Amendments

To change the primary brand name from POOL BREEZE POOL CARE SYSTEM CHLORINATING STICKS to AW34. Re-define the formulation process, revise the Basic Formulation CSF (dated March 25, 2011), the Data Matrix (dated March 25, 2011), and amend the master label.

Comments and Conditions:

Based on the submitted materials noted above, your amendment is acceptable and the following conditions and comments apply:

- a. The change of the primary brand from POOL BREEZE POOL CARE SYSTEM CHLORINATING STICKS to AW34 is acceptable.
- b. The submitted chemistry data for re-defining the formulation process is acceptable, however the corrosion and storage stability study must be submitted to EPA to complete the chemistry data requirement.
- c. The submitted revised Data Matrix (dated March 25, 2011) and the Basic Formulation CSF (dated March 25, 2011) are acceptable. The Basic Formulation CSF dated March 25, 2011 supercedes previously submitted CSFs.

d. P.2 -Under "PHYSICAL AND CHEMICAL HAZARDS". The first sentence after signal word "DANGER" insert the statement "Strong Oxidizing agent. This product can increase fire intensity. Keep away from heat and from flame and burning material (like a lighted cigarette)."

e. P.2 - Revise the "Storage & Disposal" statement according to 40 CFR156.140, 144, 146, 156.144, PR Notice 2007-4, PR Notice 83.3, and PR Notice 84.1. Note that the primary summary guidance for "Storage and Disposal" is PR Notice 2007-4.

f. P2. -Under "{Household/Residential Refillable Container}". Delete "... Trichloro-s-Triazinetrione and zinc sulfate monohydrate..." and replace with "AW34 product".

g. P.2 -Under "{Non-residential/non-household use product}" "Pesticide Storage" add the following statement "Do not allow water to get into container. Do not store with easily oxidizable materials, acids, or reducers". In case of spill, isolate container (if possible) and flood area with large amounts of water to dissolve all material before discarding this container in trash. **Emergency Handling:** In case of contamination or decomposition, do not reseal container. Isolate in open, well-ventilated area. Flood with large volume of water. Cool unopened container in vicinity by water spray."

h. P3. -Change "Container Disposal" to "**Container Handling and Disposal**". [For rigid non-refillable container Commercial/Industrial/Institutional Products] **Add:** "If allowed by state and local authorities, by burning. If burned, stay away of smoke."

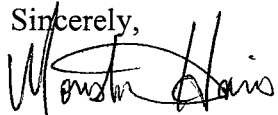
i. P.3. -Under [Rigid Refillable container] Delete "... Trichloro-s-Triazinetrione and zinc sulfate monohydrate..." and replace with "AW34 product".

General Comments:

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

This amendment and a copy of this letter have been inserted in your file for future reference.

If you have any questions or comments concerning this letter, please contact David Liem at liem.david@epa.gov or call (703) 305-1284.

Sincerely,

Monisha Harris
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

[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}

AW34

Active Ingredient: Trichloro-s-triazinetriene 92.4%
Other Ingredients: 7.6%
Total: 100.0%

Available Chlorine 84%

KEEP OUT OF REACH OF CHILDREN

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

AUG 17 2011

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

1258-1278

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.

[See [side] [back] panel for precautionary statements.]

FIRST AID: {required on front panel}

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. Causes eye and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed. Irritating to nose and throat.

- Open in a well ventilated area. Avoid breathing dust and fumes.
- Do not get in eyes, on skin or on clothing. Wear goggles and rubber gloves. For additional protection of skin, wear long sleeves and long pants.
- Wash hands after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove contaminated clothing and wash clothing before reuse.

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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).

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{Environmental hazards statement for end-use products in containers ≤ 5 gallons (liquid) or ≤ 50 pounds (solid, dry weight) use only the 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 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.

{Household/residential use products}

STORAGE & 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 zinc sulfate monohydrate 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.]

AW34 Product

{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. *DO NOT allow water to get into container. DO NOT store...*

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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.

HANDLING and
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.

Insert -> IF allowed by State and Local

{Refillable containers}

Refillable Container. Refill this container with this ~~Trichloro-striazinetrione and zinc sulfate monohydrate~~ *AW34 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.

EPA REG. NO. 1258-1278
Net wt: ZZZZZ

EPA Est. No. #####-XXXX-YYYY

Sold by:
Arch Chemicals, Inc.
P.O. Box 724438
Atlanta, GA 31139-1438

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

{Use 1} Swimming Pools

[Why You Should Use This Product: When used as directed, this product is effective as a swimming pool water sanitizer. These convenient and easy to use tablets are formulated to protect against chlorine loss in direct sunlight. They are designed to dissolve slowly providing a steady source of available chlorine (up to 1 week) for complete swimming enjoyment in your pool. [For crystal clear pool water, follow our 4 step pool 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 algacide regularly].

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 brand] [test kit] {or} [test strips] that measures all of the above ranges. [Follow label directions and adjust with appropriate product.]

OPENING YOUR POOL:

Balance pool water, shock treat, and stabilize your pool using [Brand] Stabilizer. Follow stabilizer label directions. Then follow "ROUTINE CHLORINATION" directions.

ROUTINE CHLORINATION

[For best results, see "WATER BALANCE" section above before treatment.]

[This product 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.]

[Ensure that the [skimmer basket] {or} [floater] is free of any other chemicals, tablets, or residue prior to use. Place this product in the skimmer basket or floater. 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.]

One tablet will provide an effective chlorine residual of 1-4 parts per million (ppm) in 10,000 gallons of water for up to 1 week under normal use conditions. [Contains a clarifier to clear cloudy water.]

SHOCK TREATMENT / SUPERCHLORINATION:

Every 7 days, or as necessary to prevent pool problems, shock treat/superchlorinate the pool. Additional shock treatments may be required to correct problems which are caused by visible algae, high bathing loads, heavy winds and rainstorms. Additional shock treatments may also be required to prevent problems such as unpleasant odors and eye irritation. Check available chlorine using [a brand] [test kit] {or} [test strips]. Re-entry into treated swimming pool is prohibited at available chlorine levels above 4 ppm due to risk of bodily harm.

{Marketing statements available to all labels}
 [84% Available chlorine]
 [Concentrated chlorinator for routine use]
 [Kills bacteria, destroys organic contaminants and controls algae]
 [Prevents algae]
 [Totally soluble]
 [Slow dissolving]
 [Provides long lasting chlorination]
 [Stabilized chlorinator]
 [For routine use in automatic feeders, floaters and [plastic] skimmers]
 [One [tablet] {or} [dose] treats 10,000 gallons]
 [Sanitizes pool water]
 [Swimming pool sanitizer]
 [Routine sanitizer]
 [Sun [protected] {or} [resistant] for extended chlorine life]
 [Ideal for all pool surfaces]
 [Leaves no residue]
 [Sanitizer]
 [Clarifies pool water]

[For best results [during the season], follow [our] [the] [brand] 4 step pool care program.]

- [Step 1: Balance]
- [Step 2: Sanitize]
- [Step 3: Shock]
- [Step 4: Prevent Algae]

[Follow our 3 step program:

- 1: Chlorinate, clarify, and prevent algae;
- 2: Shock;
- 3: [Sparkle and] protect {or} Protect against stains, scale and rust.]

[HOW TO CALCULATE POOL CAPACITY

SHAPE OF POOL	GAL. OF WATER (Dimensions in feet)
Rectangular	Average depth X average length X average width X 7.5
Circular	Diameter X diameter X average depth X 5.9
Oval with straight sides	Full width X full length X average depth X 6.7
Irregular	Consult pool builder]]



{Optional } []