



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

November 20, 2020

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Amy McDade, Regulatory Specialist
Arch Chemicals, Inc.
1200 Bluegrass Lakes Parkway
Alpharetta, GA 30004

Subject: Notification per PRN 98-10 – Update Marketing Language
Product Name: AW03 GRANULAR
EPA Registration Number: 1258-1328
Application Date: 09/25/2020
Decision Number: 567204

Dear Ms. McDade:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Assurance.

If you have any questions, you may contact Aidan Fife at (703) 347-8522 or via email at fife.aidan@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John Hebert".

For:
John Hebert, Chief
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Note to reviewer:

[All text in brackets [AAA] is optional and may/may not be included on all end-use labels]

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

AW03 Granular

ACTIVE INGREDIENT: Zinc Sulfate Monohydrate98.0%
OTHER INGREDIENTS:2.0%
TOTAL: 100.0%

Contains 35.5 % elemental zinc

KEEP OUT OF REACH OF CHILDREN
[MANTENGASE FUERA DEL ALCANCE DE LOS NIÑOS]

DANGER [PELIGRO]

{Note to Reviewer: In accordance with 40 CFR 156.68(d), all first aid statements, as prescribed, will appear on the front panel of the label.}

~~*{Note to reviewer: Although this product has a "Danger" signal word, as per the EPA label review manual "The Agency may permit reasonable variations in the placement of the First Aid statement as long as the reference statement, "See First Aid (or Statement of Practical Treatment) on (identify appropriate panel)" appears on the front panel." If the First Aid Statements are placed on the front panel of the final graphic label, the statement below will only reference Precautionary Statements:}*~~

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 5 minutes, then continue rinsing eye. 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 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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.

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

Read all Precautionary ~~[and First Aid]~~ Statements on [back][side][right][left] panel before use.

[Manufactured for] [Sold by]:
Arch Chemicals, Inc.
1200 Bluegrass Lakes Parkway
Alpharetta, GA 30004

EPA Reg. No.: 1258-1328
[Superscript Used in Lot Number]
EPA Est. No.: XXX-yy-zz

NET WEIGHT

AW03 Granular
EPA Reg. No. 1258-1328
EPA Draft Label dated 2020-10-29

NOTIFICATION

1258-1328

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

11/20/2020

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed or inhaled.

- [•] Do not get in eyes or on clothing. Avoid contact with skin.
- [•] Avoid breathing dust or spray mist.
- [•] Wear protective goggles.
- [•] Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
- [•] Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS: Avoid contact with strong oxidizers.

{First sentence of paragraph below for containers less than 50 lbs. 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, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination Systems (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.

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]

{Mass Channel}

[WHY YOU SHOULD USE THIS PRODUCT: When used regularly, this product will prevent the growth of green, black and [mustard] [yellow] algae.]

{Optional statement for pool care program for [Brand A]}

[For crystal clear pool water, follow the [Brand A] 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 algaecide regularly].

{Optional statement for pool care program with the [Brand B]} [For crystal clear pool water, follow the [Brand B] 3-Step Program: Step 1: Test and balance pool water, Step 2: Sanitize, and Step 3: Shock at least once a week.]

{Optional statement for pool care program for the [Brand C]}

[Take a pool water sample to your authorized [Brand C] retailer for a detailed water analysis.]

[[Download the [FREE] [Test to Swim™] [application name] app from your smartphone] [for expert water analysis, product recommendations, and dosage instructions].]

[Visit a [Test to Swim™ Station] [device/station name], at participating retailers, for expert water analysis, product recommendations and dosage instructions. [To find a participating retailer near you, visit www.hthpools.com/XXX].]

[Use a [Test to Swim™ Station] [device/station name] (at participating retailers) or download the Test to Swim™ [application name] app from your smartphone] [for expert water analysis, product recommendations, and dosage instructions].]

{Dealer Channel}

[WHY YOU SHOULD USE THIS PRODUCT:] [Using this product regularly will prevent the growth of green, black and [mustard] [yellow] algae.] [For crystal-clear pool water, follow the [brand] brand 3-Step Program: 1. Sanitize It!, 2. Shock It! And 3. Defend It!]

[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.]

[METHOD OF APPLICATION:] [HOW TO USE:]

Always apply chemicals separately. Never combine them. Add this product either directly to pool or through the skimmer while pump is in operation [according to the dosage table below]. [Round your pool size to the nearest 10,000 gallons.] [Pools with heavy growth of algae must be cleaned prior to using this product.] Continue to keep the pump running for several hours after addition of algaecide.

{When contents are in a single use bag or pouch:} [Use entire contents of [bag] [pouch] when opened.]

[OPENING YOUR POOL:] [and/or] [INITIAL DOSE:] {or} [START-UP DOSE:]

{Mass Channel}

[Add 6 oz. of this product per 10,000 gallons of pool water.]

{or}

{Dealer Channel}

[To prevent visible algae from growing in your pool:

[1.] Add Start-up Dosage (see dosage table) of [AW03 Granular][this product] to establish level needed to begin protecting your pool.

[2.] Continue with [BRAND] sanitizer system treatment.]

[MAINTENANCE DOSE:]

{Mass Channel}

[Add 2 oz. of this product per 10,000 gallons of pool water each month.]

{or}

{Dealer Channel}

[[1.] Monthly add [AW03 Granular] [this product] per the dosage table, or take a water sample to your Authorized [brand] Dealer to test for [AW03 Granular] level.

[2.] If [AW03 Granular] [this product] is less than 0.5 ppm add a Start-Up dose; if level is greater or equal to 0.5 ppm add a Maintenance dose according to the table.]]

[POOL CLOSING:][[CLOSING YOUR POOL:] [WINTERIZING:]

{Mass Channel}

[When swimming season is over, add 4 oz. of [AW03 Granular] [this product] per 10,000 gallons of pool water.]
[This dosage helps control algae growth during the winter months and aids the servicing of the pool before it is returned to use the following season.]

[Follow recommended [brand] pool closing procedure.]]

{or}

{Dealer Channel}

[[1.] Add a Closing Dose of [AW03 Granular] [this product] according to the table.

[2.] Follow recommended [brand] pool closing procedure.]]

{Dosage chart for re-closable containers}

Dosage Table			
Pool Size, Gallons (round to nearest 5,000 gallons)	[Initial] [Start-Up] Dosage Number of [Ounces][oz.]	Maintenance Dosage Number of [Ounces][oz.]	[Closing][Winterizing] Dosage Number of [Ounces][oz.]
5,000	3	1	2
10,000	6	2	4
15,000	9	3	6
20,000	12	4	8
25,000	15	5	10
30,000	18	6	12
35,000	21	7	14
40,000	24	8	16

{Dosage chart for 2 ounce pouch}

Dosage Table			
Pool Size, Gallons*	[Initial] [Start-Up]	Maintenance	Closing
10,000	6 oz	2 oz	4 oz
20,000	12 oz	4 oz	8 oz
30,000	18 oz	6 oz	12 oz
40,000	24 oz	8 oz	16 oz

*round to nearest 10,000 gallons

{Optional instructions for pool kit}

[For Pool Opening:

Prepare the pool:

1. Remove cover and raise the water level as needed per the pool manufacturer's directions.
2. Reconnect hoses, circulation and electrical equipment, then start pump.

Prepare the water:

1. Circulate water for at least 8 hours, then test using [test kit or test strip name].
2. Balance Total Alkalinity, pH, and Calcium Hardness using the appropriate [brand] products.
3. Add the [algaecide product name] through the skimmer. Follow the directions on the product label for opening dose amounts based on pool volume.
4. Next, broadcast the [metal control product name] over the deepest part of the pool. Maintain circulation for 24 – 48 hours.
5. Broadcast the [shock product name] over the deepest part of the pool according to "Opening Your Pool" instructions on product label.
6. Add your preferred [brand] sanitizer as needed and maintain free available chlorine level between 1 – 4 ppm. Follow normal maintenance routine.

For Pool Closing:

1. Balance the water and clean the filter using [brand] products.
2. With the pump and filter operating, broadcast the [shock product name] over the deepest part of the pool according to pool "Shock Treatment" instructions on product label.
3. Next, add the proper closing dose of [algaecide product name] through the skimmer.
4. Broadcast the [metal control product name] over the deepest part of the pool. Maintain circulation for 24 – 48 hours.
5. Follow equipment manufacturer's directions to winterize the pump, filter, and other pool equipment.

[Follow label directions for each of these products. [See side panel.]]

{Use 2} [SPAS & HOT TUBS]

[WHY YOU SHOULD USE THIS PRODUCT:]

[When used regularly, this product will prevent the growth of green, black and [mustard] [yellow] algae.]

[[Download the [FREE] [Test to Swim™] [application name] app from your smartphone] [for expert water analysis, product recommendations, and dosage instructions].]

[Visit a [Test to Swim™ Station] [device/station name], at participating retailers, for expert water analysis, product recommendations and dosage instructions. [To find a participating retailer near you, visit www.hthpools.com/XXX].]

[Use a [Test to Swim™ Station] [device/station name] (at participating retailers) or download the Test to Swim™ [application name] app from your smartphone] [for expert water analysis, product recommendations, and dosage instructions].]

[METHOD OF APPLICATION:][HOW TO USE:]

Always apply chemicals separately. Never combine them. This product works best when added [in several places] by itself directly to spa or hot tub water with the pump running. Continue to keep the pump running for at least 30 minutes after addition of algaecide. Wait 15 minutes before entering the spa or hot tub. Clean spas or hot tubs with heavy growth of algae prior to using this product.

INITIAL TREATMENT: Add 1/4 oz. [(1 1/2 teaspoons (tsp))] per 400 gallons water. Initial dose is used upon filling of Spa/Hot Tub. For maximum effectiveness, spas containing heavy algae growth must be drained and cleaned prior to treatment. Drain and clean Spa/Hot Tub at least once a month or as needed depending on bather load.

MAINTENANCE DOSE: After initial treatment, to keep your spa free of algae growth, add 0.1 oz. [(1/2 tsp)] per 400 gallons capacity every 5-7 days. This algaecide can be used in conjunction with chlorine or bromine sanitizer systems.

STORAGE & DISPOSAL:

{Nonrefillable container - household/residential use}

[Keep this product dry in its original tightly closed container when not in use. Store in a cool, dry, well-ventilated area 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.]

{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. 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. Refillable container. Refill this container with this product 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.]

{BEGIN OPTIONAL MARKETING CONTENT}

{Algae Treatment – Green}

Algae [fighting]

Algaecide [treatment]



Controls algae growth

Effective green algae [control] [prevention]

Ideal for treating green algae

Long lasting protection from algae

Protects against algae growth

Prevent[s] algae growth [before it starts]

[Prevents] [and] [&] [Controls] algae

[Prevents] [and] [&] [Controls] green algae

Prevents algae

Prevent algae growth before it starts

Prevents green algae

Prevents re-growth of algae

Treats algae growth

[Treats][Controls] algae growth

{Algae Treatment – Multi}

Controls] green [, blue-green] [, mustard] [, yellow] [,and][&] other] [swimming pool] algae

Controls green [, mustard] [, yellow] [,and][&] black] [swimming pool] algae

Controls growth of green [, blue-green] [, mustard] [, yellow] [,and][&] other] [swimming pool] algae

Controls growth of green [, mustard] [, yellow] [,and][&] black] [swimming pool] algae

[Destroys][Eliminates][Kills] [and][&] prevents green [pool] algae

[Destroys][Eliminates][Kills] [and][&] protects against green [pool] algae

Effective treatment against green, black [and][&] [mustard] [yellow] algae

Ideal for treating algae

Ideal for treating black algae

Ideal for treating green [and][&] [mustard] [yellow] algae

Ideal for treating green, black [and][&] [mustard] [yellow] algae

Kills [and][&] prevents all algae



Prevents green [, blue-green] [, mustard] [, yellow] [,and][&] other] [swimming pool] algae

Prevents green [, mustard] [, yellow] [,and][&] black] [swimming pool] algae

Protects against green [, blue-green] [, mustard] [, yellow] [,and][&] other] [swimming pool] algae

Protects against green [, mustard] [, yellow] [,and][&] black] [swimming pool] algae

Stops green [, mustard] [, yellow] [,and][&] black] [swimming pool] algae

Treats green [, blue-green] [, mustard] [, yellow] [,and][&] other] [swimming pool] algae

Treats green [, mustard] [, yellow] [,and][&] black] [swimming pool] algae

{Compatibility with salt pools}

Compatible with salt [water] [systems] [pools]



Salt [water] [system] [pool] compatible



[Works in][Designed for] [chlorine [and][&]] salt pools

Works with saltwater [systems] [pools]



{Ease of Use}

Convenient

Easy[-]to[-]use

Easy, economical, convenient to use

Economical

Reduced maintenance formulation

{General Marketing Language/Graphics}

10,000 gallon pools



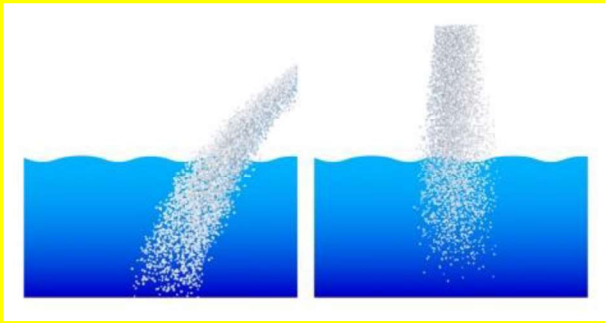
Bonus Pack

Compatible with most sanitizers [including bromine, chlorine, biguanide, salt water, ozone and minerals].

Concentrated Formula

For pool startup and routine maintenance

[Granular][Granules]



Ideal for pools 10,000 gallons and up



Made in the USA



Made in the USA of US and imported content.

Monthly use prevents algae

No need to pre-dissolve

[Pour][Add] directly in **[to]** pool water



{or}

Swim immediately

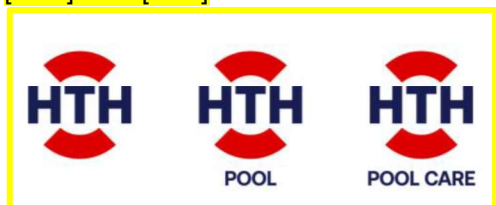
Value Pack

{Heritage Claims/Logos}

90 Years of Perfect Pools



[HTH] Pool [care]



[Here to Help] [since 1928]



Pool [Care] Experts since 1928



{Multi-Benefit}

- 6-in-1 [Action] [Algaecide]
- 5-in-1 [Action] [Algaecide]
- 4-in-1 [Action] [Algaecide]
- 3-in-1 [Action] [Algaecide]
- 2-in-1 [Action] [Algaecide]
- Multi-action algaecide
- Multi-action algicide

{Pack Description}

[Bonus] [Free] bottle [of X] inside {where "X" represents a product name}
[Receive][Get] X bonus bottle[s] {where "X" represents a number}

{Pool kit}

- 10 Bonus [product name] Test Strips included
- Convenient and easy to use kit for opening or closing your pool
- For best results, use with other HTH® pool care products
- For opening or closing your pool
- HTH® Balancers and Sanitizers sold separately
- Ideal for pools ranging from 10,000 to 20,000 gallons
- Includes 10 Bonus [product name] Test Strips
- The [HTH® Pool Care Kit][Brand name of kit] is ideal for opening your pool or closing your pool
- Treats up to 20,000 gallons

{Pool Measurement}

HOW TO CALCULATE POOL CAPACITY IN U.S. GALLONS	
POOL SHAPE	FORMULA (Dimensions in feet)
Rectangular:	$L \times W \times AD \times 7.5 = \text{total gallons}$
Round:	$Di \times Di \times AD \times 5.9 = \text{total gallons}$
Oval:	Maximum L x maximum W x AD x 5.9 = total gallons
Freeform:	Surface area (sq. feet) x AD x 7.5 = total gallons

L = Length, W = Width, AD = Average Depth, Di = Diameter

{or}

To calculate your pool's capacity, visit hthpools.com/XXXX.

{Pool Type}

[Best used with][Ideal for][For] pop-up pools



Compatible with all pool sanitizers

Effective in vinyl and plaster pools

[For use][Ideal] [with][for] all pool [surfaces][types]

[For use][Ideal] [with][for] all pool types [including vinyl-liner pools]

For use in vinyl and plaster pools

Good for all pool surfaces

Ideal for [in ground] [and][&] [above ground] [pools] [with a skimmer]

Ideal for use in chlorine pools

Ideal for use in chlorine-free pools

Ideal for [vinyl-lined pools] {or} [pools with vinyl liners] when used as directed

Special pop-up pool size

{Product Support}

For product questions/support [from [brand] pool [and spa] care experts:

Call: [brand number][866-HTH-Pool]

Chat online: [brand website][hthpools.com]

We're available 7 days a week from 8 AM to 10 PM EST.

Visit: [brand website][hthpools.com]



[Get social with us at:][Connect and Swim with us on Social [Media]:]

www.youtube.com/brand

www.facebook.com/brand

www.instagram.com/brand

www.pinterest.com/brand

www.google.com/+brand

(use social icons)



{Scan Here Icons and Text}



Scan here for all details

{Spas and Hot Tubs}

Controls green [, black] [and][&]] [mustard] [yellow] [spa] algae

Controls growth of green [, black] [and][&]] [mustard][yellow] [spa] algae

Protects against green [, black] [and][&]] [mustard] [yellow] [spa] algae

Prevents green [, black] [and][&]] [mustard] [yellow] [spa] algae

Treats green [, black] [and][&]] [mustard] [yellow] [spa] algae

{Spa Type}

Good for all [spa] surfaces

Ideal for spa use

{Steps – Please note that on a final graphic label, only the step appropriate to this product will be highlighted, or alternately, only the step appropriate to this product will be used}

For best results, follow the [brand] 3-Step Program:

For best results, follow the [brand] 4 step pool care program:

[Step] [1] [Balance]

[Step] [2] [Sanitize]

[Step] [3] [Shock] [Weekly]

[Step] [4] [Prevent Algae]

{Graphic renderings of the 4 steps:}



[Brand] 3-Step System]

[Step] [1] [Balance]

[Step] [2] [Sanitize]

[Step] [3] [Shock] [Weekly]

Prevent

Enhance

[Brand or poolife®] 3-Step System:

[Step] 1 [Sanitize It!]

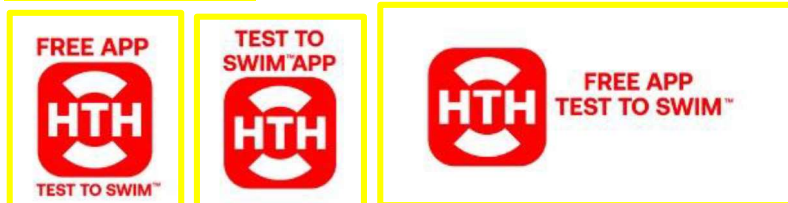
[Step] 2 [Shock It!]

[Step] 3 [Defend It!]

{Testing}

Free App

Test to Swim™ [App]



{Trademark}

[Brand name] and the [brand] logo are trademarks of **Innovative Water Care, LLC** or its affiliates.

[HTH®][brand] and the [HTH®][brand] logo are registered trademarks of Arch Chemicals, Inc.

{Winterizing}
Effective winterizer
Ideal for winterizing

Proposed Alternate Brand Name(s):

HTH Pool Care Algae Guard Granules

Approved Alternate Brand Names:

90 Years of HTH Clear Pools HTH Algae Guard Granules
90 Years of HTH Perfect Pools HTH Algae Guard Granules
90 Years of HTH Pool Expertise HTH Algae Guard Granules
Baquacil AlgiDefense
Baquacil ALGIPREVENT
HTH Algae Guard Granules
HTH Winterizing Algae Control
Open/Close Algistat

{END OPTIONAL MARKETING CONTENT}