



#### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

#### June 18, 2013

Ms. Leigh Ann Richardson, Senior Regulatory Associate Arch Chemicals, Inc. 5660 New Northside Drive, NW, Suite 1100 Atlanta, GA 30328

SUBJECT:

FQPA Code 332 Minor Label Changes per PR Notice 98-10

PRODUCT NAME: AW13 EPA REG. NO.: 1258-1337

APPLICATION DATE: March 26, 2013

APPLICATION RECEIVED DATE: March 28, 2013

#### Dear Ms. Richardson:

This acknowledges receipt of your Notification application, submitted under the provisions of FIFRA section 3(c) 7(A) and PR Notice 98-10.

#### Pesticide Application:

Lonza Microbial Control is submitting the following Minor Label Change for **EPA Reg. No.** 1258-1337:

#### On Page Five:

Added a CDT Graphic Symbol that means, "Controlled Deliver Technology," and this graphic is intended to summarize the following previously approved Optional Marketing Statements: 1.) Slow dissolve; 2.) Advanced technology for slow erosion; 3.) Controlled Delivery System; and 4.) Controls erosion rate of product.

#### **General Comments:**

Based on the review of the submitted material, the following comments apply.

The Notification application is Acceptable.

A copy of the accepted Notification is attached in Regulatory File Jacket 1258-1337.

If you have questions or comments with regard to this Agency Letter, the please contact Killian Swift via email at **Swift.Killian@epa.gov** or by telephone at **703-308-6346.** When you are submitting information or data in response to this Agency Letter, please send a copy of this Agency Letter with your response in order to facilitate processing.

Sincerely yours,

Michael L. Mendelsohn,

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

Please read instructions on reverse befor	e completing f	orm.\ orm	Approved, OMB i	No. 2070-0060, Approval	expires98			
TADA	Unit	ed States		☐ Registrat	ion	OPP Ide	entifier Number	
EPA Environmental Protection			Agency	ency				
		Other						
Application for Pesticide - Section 1								
1. Company/Product Number 1258-1337			EPA Product Manager     Monisha Harris			3. Proposed Classification		
4. Company/Product (Name)			PM#	PM#		None	Restricted	
AW13			32					
Name and Address of Applicant (Include ZIP Code)     Arch Chemicals, Inc				6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(l), my product is similar or identical in composition and labeling to:				
5660 New Northside Dr, NW, Suite 1100				EDA D M				
Atlanta, GA, 30328				EPA Reg. No. Product Name				
Check if this is a new address	Troduc	Troduct Namo						
Section – II								
Amendment - Explain below. Final printed labels in response to Agency letter dated_								
Resubmission in response to Agency letter dated				"Me Too" Application				
Notification - Explain below.								
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)								
*Not Subject to PRIA*								
Label Notification to add marketing language as indicated in the cover letter.								
This notification is consistent with the provisions of PR-Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other								
changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is								
not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.								
Signature: Aerah San Richardsa Date: 3/20/13								
Section – III								
Material This Product Will Be Pa								
Child-Resistant Packaging Yes*		ackaging Yes		Water Soluble Packa Yes	ging	2. Type of Conta	iner	
No No		i es No		No		Plastic		
*Certification must be	If "Ye		No. per	If "Yes"	No. per	Glass		
submitted	Unit P	ackaging wgt.	container	Package wgt.	container	Paper		
						Other (Speci	ify)	
3. Location of Net Contents Informa		4. Size(s) F	Retail Container		5. Location of I	abel Directions		
Label Con	tainer	various			On Label	(	<b>(</b> C	
6. Manner in Which Label is Affixe	d to Product		ithograph	Other	On labeling	g accompanying pr	Sylvet	
0. Wilding in Willen Baber is filling	a to 110 duct	⊠ P	aper glued					
			Stenciled		, c e		(	
Section – IV								
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application),								
Name Leigh Ann Richardson	Title Sr. Regula	le Sr. Regulatory Services Associate  C Telephone No. (Include Area Code) 678-627-2126						
Certification 6. Date Application Received								
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge								
that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. (Stamped)								
2. Signature . St. Regulatory Services Associate  Sr. Regulatory Services Associate								
4. Typed Name Leigh Ann Richardson	5. Date	Date 3/26/2013						
Leigh Alli Nicharusoff			314014013				_	

4/1



Via Fed Ex

Ms. Monisha Harris, PM -32 Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202-4501 Arch Chemicals, Inc. 5660 New Northside Drive Suite 1100 Atlanta, GA 30328 USA

Leigh Ann Richardson Lonza Microbial Control Regulatory Services

Tel: 678-627-2126 Fax:678-627-2081 LeighAnn.Richardson@Lonza.com

March 26, 2013

SUBJECT: AW13, EPA Reg. No. 1258-1337
Application for Label Notification

Dear Ms. Harris:

I am submitting an application to make the following changes to the above named product label:

1. On page 5 add optional marketing claims [CDT Controlled Delivery Technology] {or}



We believe these should be accepted because the product is desgined to dissolve slowly, which provides a controlled delivery of the chlorine. We have similar claims already on the label for this product. Examples include:

[Slow dissolve]

[Advanced technology for slow erosion]

[Dissolves slowly for long lasting sanitization]

[Controlled Delivery System]

[Controls erosion rate of product]

Please find enclosed the following documents in support of this notification:

- Application for Pesticide (8570-1)
- Certification with Respect to Label Integrity
- 1 copy of the proposed label with changes highlighted
- 1 CD with proposed label

2/2, March 26, 2013, AW13, EPA Reg. No. 1258-1337, Label Notification

If you have any questions or need any additional information, please feel free to contact me at 678-627-2126 or leighann.richardson@lonza.com.

Sincerely,

Arch Chemicals, Inc.

Leigh Ann Richardson Sr. Regulatory Services Associate

pegh Ann Richardson

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}

### **AW13**

ACTIVE INGREDIENT: Trichloro-s-Triazinetrione ..... 97.3% OTHER INGREDIENTS: ..... 2.7% 100.0%

[Available chlorine 88%]

#### KEEP OUT OF REACH OF CHILDREN

### DANGER [PELIGRO]

Contamination or improper use may cause fire, 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 and spatter. Do not add water to this product. Add only into water. {Optional - for use on residential use swimming pool products} [Do not remove floater or other dispensing device from water for more than five minutes if it contains a tablet or tablet residue.] {The following optional statements are 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.] Corrosive. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. Harmful if swallowed.

Read all Precautionary and First Aid Statements before use.

{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 not be used :}

See [left] [right] [side] [back] panel for Precautionary and First Aid Statements.

NOTIFICATION

[Manufactured for]	[Sold by]:
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Arch Chemicals, Inc. P.O. Box 724438

Date Revelwed:\_\_\_ Atlanta, GA 31139-1438 Reviewed By:

Killian B. Swift

EPA Reg. No. 1258-1337 EPA Est. No. XXXX-YY-ZZ

**NET WEIGHT:** 

#### 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. Do not breathe 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 thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove contaminated clothing and wash clothing before reuse.

#### 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 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 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.

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** 

#### 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 gas and spatter. Do not add water to this product. Add only into water.

- [Do not mix this product with a small amount of water. Only add this product directly to your pool.] {This statement will appear on Pool use labels only.}
- 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.
- Use only clean and dry utensils to dispense this product.
- Do not allow this product to contact other water treatment products. If used in a skimmer; make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in a skimmer.
- Avoid spilling this product.

Exposure to heat can cause this product to rapidly decompose, leading to fire, explosion, and the release of toxic gases.

• Store in a cool, dry, well-ventilated area away from heat or open flame.

Strong oxidizing agent. This product can increase fire intensity.

Keep away from heat and from flame and burning material (like a lighted cigarette).

{First sentence of paragraph below for containers 50 lb. or less; complete paragraph for all other sizes} **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 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.

#### STORAGE & DISPOSAL:

{Nonrefillable container - household/residential use}

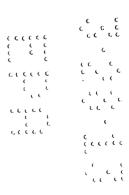
[Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame. Nonrefillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. 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."]

{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 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.]

**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.





{If the following Spanish statement is used, it must appear directly above DIRECTIONS FOR USE.} Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

#### **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.** 

These convenient and easy to use [BRAND] chlorinating [sticks\*1] {or} [cartridges] are formulated to protect against chlorine loss in direct sunlight, and can be used in skimmers [, [[and] floaters] [and feeders]]. They are designed to dissolve slowly to provide a steady source of available chlorine. [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 by that product.]

Adjust and maintain pool water 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. [Bring a pool water sample to your [brand] dealer frequently to test for water balance.] Maintain free available chlorine between 1 - 4 ppm using [a stabilized chlorine product] {or} [brand granular shock].

#### [Directions:

- 1. Shock pool with [a/an] [brand] shock product.
- 2. Add stick\* to skimmer per 5,000 gallons of pool water. Refer to "Method of Application for [Skimmer] [Floater] [Cartridge] Use" section [below][on label].
- 3. Weekly shock pool with [a/an] [brand] shock product.]

## {Directions for use with stick form of this product in skimmer [or floater]} [Method of Application for [Skimmer] [or] [Floater] Use:

Ensure that the [skimmer basket][or] [floater] is free of any other chemicals, tablets, or residue. Place this product in the [skimmer basket][or] [floater]. Use one stick per 5,000 gallons of water. Do not add other chemicals to the [skimmer][or] [floater] while this product is present. [This product is not recommended for use in vinyl-lined pools without an automatic timer on the filter pump.] [Pump should run a minimum of 8 hours per day[, otherwise vinyl liner damage may occur].] If free available chlorine goes above 4 ppm, reduce skimmer flow rate or daily pump operation time. Reentry into treated swimming pools is prohibited above levels of 4 ppm chlorine due to risk of bodily injury. If chlorine residual goes below 1 ppm, add enough [brand] granular calcium hypochlorite product to maintain 1-4 ppm of chlorine, and increase skimmer flow rate or daily pump operation time.

Place [a] new [AW13 or other brand] stick[s]\* into the [skimmer] [or] [floater] each week or when the old stick[s]\* ha[s][ve] fully dissolved. The number of sticks\* and frequency of use will wark with bather load, water temperature, rain, and pump operating time.]

# {Directions for use with cartridge form of this product in a [brand] feeder} [Method of Application for Cartridge Use:

Turn off filter pump. Open [brand] feeder, remove cartridge container and allow any water remaining in the empty cartridge to drain back into the feeder. Dispose of empty cartridge material. Refill cartridge container with new [AW13 or other brand] cartridge. Replace cartridge container, then close the feeder and turn filter pump back on. Set chlorine delivery rate to maximum setting.

<sup>&</sup>lt;sup>1</sup> \*The term "stick[s]" may be replaced with "tablet[s]", "capsule[s]", "cube[s]", or other descriptive term, either singular or plural, according to each respective product design.

After 24 hours check chlorine residual level with a test [kit {or} strip]. If free available chlorine is above 4 ppm, reduce the feed rate and retest in 24 hours. Reentry into treated swimming pools is prohibited above levels of 4 ppm free available chlorine due to risk of bodily injury.

Test chlorine residual on a regular basis, and if below 1 ppm free available chlorine, increase dial setting. Be sure to refill cartridge when contents are fully dissolved. 1

{Optional marketing claims – anywhere on label}

[Controls Bacteria and Algae] (or) [Bacteria and algae control]

[Prevents Bacteria and Algae]

[Kills bacteria]

[Kills Algae {or} Inhibits Algae]

[Sanitizer [for Chlorine Pools]]

[Stabilized {or} Sun protected] for extended chlorine life]

[Stabilized Sanitization]

[For Skimmer Chlorination Only]

[For Skimmer Use Only]

[Enhanced filter performance]

[Use 1 Stick per 5,000 gallons]

[Slow dissolve]

[Advanced technology for slow erosion]

[Dissolves slowly for long lasting sanitization]

[Longer lasting]

[Controlled Delivery System]

[Controls erosion rate of product]

[Slow erosion to protect liners]

[Slow eroding tablets]

[Treat every 2 weeks dependent on pump operating time]

[Sanitizes {or} Chlorinates] up to [14 days {or} 2 weeks]

[Extended Sanitization for up to 14 Days]

[Lasts up to 10 days with pump continuously running]

[Lasts longer than other sticks]

[Gentle on Equipment and Liners]

[Ideal for [vinyl-lined pools] {or} [pools with vinyl liners]]

[Shock weekly with [POOLIFE ® Exclusive Pool Care Collection Turboshock {or other brand}]

[Step 1: Balance

Step 2: Sanitize

Step 3: Shock

Step 4: Prevent Algae]





[CDT Controlled Delivery Technology] {or}



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