



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

May 4, 2018

Joanna Holcombe  
Regulatory Specialist  
Arch Chemicals, Inc.  
1200 Bluegrass Lakes Parkway  
Alpharetta, GA 30004

Subject: Notification per PRN 98-10 – Notification for additional marketing content and minor corrections  
Product Name: AW38  
EPA Registration Number: 1258-1341  
Application Date: March 21, 2018  
Decision Number: 539928

Dear Ms. Holcombe:

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) list 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 Compliance.

If you have any questions, you may contact Melanie Bolden at (703) 347-0165 or via email at [Bolden.Melanie@epa.gov](mailto:Bolden.Melanie@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Wanda G. Fuller, for".

Demson Fuller, Product Manager 32  
Regulatory Management Branch II  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

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}

## AW38

### ACTIVE INGREDIENTS:

Trichloro-s-Triazinetrione ..... 91.1%

Zinc sulfate monohydrate ..... 3.5%

OTHER INGREDIENTS: ..... 5.4%

TOTAL: ..... 100.0%

[Available Chlorine 83%]

**KEEP OUT OF REACH OF CHILDREN**

**[MANTÉNGASE FUERA DEL ALCANCE DE LOS NIÑOS]**

## DANGER [PELIGRO]

{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.}

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. 1258-1341

[Superscript Used in Lot Number]

EPA Est. No. XXXX-YY-ZZ

NET WEIGHT:

### NOTIFICATION

1258-1341

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:

05/04/2018

**PRECAUTIONARY STATEMENTS:**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER: Corrosive. Causes irreversible eye damage 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 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.

**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 gases. Do not add water to this product. Only add product 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 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.

**Strong oxidizing agent. This product can increase fire intensity.**

- [•] Keep away from heat and from flame and burning material, including lighted cigarettes.

*{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, 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 AND DISPOSAL:**

*{Nonrefillable containers - household/residential use products }*

[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.]

*{Commercial use products}*

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

**Pesticide Storage:** Keep container tightly closed and dry when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame.

**Pesticide Disposal:** To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program.

**Container Handling:** Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a tank mix. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.]

**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.**

#### **[WHY YOU SHOULD USE THIS PRODUCT:]**

[When used as directed, this product is an effective swimming pool water sanitizer. [These convenient and easy to use [brand] [product name] [chlorinating] tablets<sup>1</sup> are formulated to protect against chlorine loss from sunlight, and can be used in feeders<sup>2</sup>.] [In addition to sanitizing, [brand] [tablets] [this product] provide[s] the additional benefits of preventing algae growth, clarifying pool water, softening water, and protecting your equipment [and surfaces] from stain and scale.] [They are designed to dissolve slowly [to provide a steady source of available chlorine] [to control the growth of algae, kill bacteria and destroy organic contaminants].]

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

[For crystal clear pool water, follow our [Brand A] 4 step pool care program: Step 1: Test and adjust pool water balance, Step 2: Sanitize, Step 3: Shock treat your pool at least once a week, and Step 4: Add algicide regularly].

*{Optional statement for pool care program with the [Brand B]}*

[For crystal clear pool water, follow our [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.]

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

Place this product in a feeder, floater or skimmer designed for this product. Use in a new feeder or any device which has previously contained only this product, trichloro-s-triazinetrione. If placed in the skimmer, run the pump a minimum of eight hours daily. **DO NOT** use in feeders that have been used with other water treatment products. **DO NOT** throw tablets directly into pool or pool surface damage could occur. **DO NOT** permit tablets to contact plastic pool linings or metal objects. **DO NOT** use in any feeder which has been used with other chlorinating compounds. **DO NOT** add other chemicals to the feeder while this product is present.

*{For skimmer application:}*

[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] [and add enough [BRAND] granular shock to maintain 1-4 ppm of chlorine.]

**Re-entry into treated swimming pools is prohibited above levels of 4 ppm chlorine due to risk of bodily injury.**

#### **WATER BALANCE:**

[Adjust and maintain total alkalinity from 80 to 120 parts per million (ppm), pH from 7.2 to 7.6, and calcium hardness above 200 ppm. [Always check and adjust total alkalinity before adjusting pH levels.] Test frequently using [a brand] [test kit] {or} [test strips] that measure[s] all of the above ranges. [Follow label directions and adjust with appropriate product.]]

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

<sup>1</sup> The term “tablet[s]” may be replaced with “stick[s]”, “capsule[s]”, “cube[s]”, “cartridge[s]”, or other descriptive term, either singular or plural, according to each respective product design.

<sup>2</sup> The term “feeder” may be replaced with “floating dispenser”, “floater”, “automatic chlorinator”, “skimmer”, “skimmer basket”, “feeding device”, or a list containing any of these devices.

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

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

{or}

[Adjust and maintain pool water to recommended ranges:

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

NOTE: Always check and adjust total alkalinity before adjusting pH levels.]

**[OPENING YOUR POOL:**

[Balance pool water per levels in WATER BALANCE section. Shock treat with a [brand] shock product and stabilize your pool using [brand] stabilizer. Follow label directions for each of these products.]

{or}

[Balance pool water, shock treat, and stabilize your pool using [brand] Stabilizer, following label directions.]]

**ROUTINE CHLORINATION:**

*{For 6-8 ounce tablets}*

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

*{For 1" tablets}*

[Add [four one-half ounce tablets per 10,000] {or} [two one-half ounce tablets per 5,000] gallons of pool water every other day, or as often as needed to maintain a chlorine residual of 1-4 ppm.]

[This dosage may vary depending upon bather load, water temperature and other conditions.]

**[SHOCK TREATMENT / SUPERCHLORINATION:**

As a preventative treatment, shock treat your pool once per week [with [brand] shock treatment]. Additional shock treatments may be necessary 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.]

**{BEGIN OPTIONAL MARKETING CONTENT}**

**{General}**

Bonus Pack

Made in the USA



Made in the USA of US and imported content.

Special formula



{or}



Value Pack

**{Algae}**

Algae [destroying][killing][fighting]

Algaecide

[Controls][Destroys][Kills][Inhibits][Prevents] algae

[With][Contains] built-in algae [protection][fighter]

**{Bacteria & Algae}**

Bacteria [and][&] algae control

[Controls][Destroys][Kills][Inhibits][Prevents] [Bacteria] [and][&] Algae

Kills bacteria, destroys organic contaminants [and][&] controls algae

Protects against bacteria [and][&] algae

Routine use protects water from bacteria [[and][&] algae]

**{Bacteria Control}**

Bacteria [destroying][killing]

Begins working [fast] to destroy bacteria

Destroys bacteria

Destroys organic contaminants

[Eliminates][Kills] bacteria

**{Clarifier}**

[Built-in] [Contains a] clarifier  
Clarifier  
Clarifies [pool] water  
Clarifying, water softening, and scale protection  
Clears cloudy water  
Contains built-in clarifier  
[Contains] clarifying [additive]  
[Creates][Produces] sparkling, crystal clear water  
Crystal clear results in 24 hours  
Delivers sparkling [pool] water  
For crystal clear, sparkling blue water  
Includes clarifying agent  
Keeps [pool] water clean [and][&] crystal clear  
Maintains brilliantly clear water  
Restore[s] crystal clarity to water

**{Contamination}**

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. Do not add water to this product. Only add product into water. If floater or other dispensing device contains tablets or tablet residue, do not remove the device from water for more than five minutes.

**{Ease of Use}**

Convenient  
Convenient one week dosage  
Easy, economical, convenient to use  
Easy to use  
Reduced maintenance formulation

**{Filtration}**

Contains additive to assist filtration  
Contains additive to enhance filter performance  
Precipitating agent included



**{Heritage Claims/Logos}**

90 Years of Clear Pools

90 Years of Perfect Pools

90 Years of Pool Expertise

[Here to Help] [since 1928]

Pool [Care] Experts since 1928



**{Multi-Benefit}**

2-in-1 Action: Sanitizes [and][&] prevents algae

2-in-1 [Action] [Sanitizer]

3-in-1 Action: Sanitizes, prevents algae, [and][&] clarifies water

3-in-1 [Action] [Sanitizer]

4-in-1 [Action] [Sanitizer]

5-in-1 [Action] [Sanitizer]

6-in-1 [Action] [Sanitizer]

7-in-1 [Action] [Sanitizer]

Dual action: Sanitizes [and][&] prevents algae

[Multi-purpose][Multi-functional] sanitizer

[Multi-purpose][Multi-functional] tablet

**{Patent}**

Patent Pending

**{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](http://hthpools.com/XXXX).

**{Pool Type}**

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



For routine use in automatic feeders, floaters [and][&] [plastic] skimmers

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

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

Good for all pool surfaces

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

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]

**HELPLINE**  
**866-HTH-POOL**  
( 4 8 4 - 7 6 6 5 )  
Call 7 days a week with your pool care questions.  
**8:00 AM - 10:00 PM EST**  
Visit us online:  
www.hthpools.com

**HELPLINE**  
**866-HTH-POOL**  
( 4 8 4 - 7 6 6 5 )  
Call 7 days a week with your pool care questions.  
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**8:00 AM - 10:00 PM EST**  
Visit us online:  
www.hthpools.com

{or} {or}

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

[www.youtube.com/brand](http://www.youtube.com/brand)

[www.facebook.com/brand](http://www.facebook.com/brand)

[www.instagram.com/brand](http://www.instagram.com/brand)

[www.pinterest.com/brand](http://www.pinterest.com/brand)

[www.twitter.com/brand](http://www.twitter.com/brand)

(use social icons)

**{Residue/Solubility/Scale}**

Contains anti-stain [and/or] anti-scale additive[s]

Contains equipment protection

Contains stain and scale [preventative] {or} [preventer]

Contains stain preventing [additive][ingredient]

Gentle on equipment [and][&] liners when used as directed.

Helps prevent [from] [stains] {or} [staining] [and][&][scale] {or} [scaling]

Helps prevent scale buildup

Helps prevents stain and scale

Helps protects equipment [from stain and scale]

No fading of liner[s] when used as directed

Non-staining [formula]

Slow dissolving

[Won't][Will not] [fade liner when used as directed]

[Won't][Will not] [cause staining] [or] [damage liners] when used as directed

**{Sanitizer}**

83% available chlorine  
91.1% active ingredient  
Concentrated chlorinator for routine use  
Provides long lasting [chlorination][sanitization]  
Regulates chlorine release  
[Routine] Sanitizer [for chlorine pools]  
Provides effective chlorination [at an economical price]  
Sanitizer  
[Sanitizer][Chlorine] lasts up to one week  
Sanitizes for [brilliantly] clear water  
Sanitizes pool water  
[Sanitizes][Chlorinates] up to one week  
Stabilized [Sanitization][Chlorination]  
Stabilized [Sanitizer][Chlorinator]  
Swimming pool sanitizer

**{Scan Here Icons and Text}**



Scan here for all details

**{Shock}**

Shock weekly with [brand][product name]

**{Stabilization}**

Contains built-in resistance to sunlight  
Provides sun defense [for pool water]  
Stabilized for [extended][longer] chlorine life  
Sun [protected] {or} [resistant] for [extended][longer] chlorine life  
With built-in resistance to sunlight

**{Steps}**

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:}*



*{for routine chlorination directions}*

**{Trademark}**

[Brand name] and the [brand] logo are trademarks of Lonza or its affiliates.

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

**{Treatment}**

[1][One] [tablet] *{or}* [dose] treats 10,000 gallons

[1][One] [tablet] *{or}* [dose] treats 10,000 gallons per week

Contains X Tablets

Use [1][One] tablet per 10,000 gallons [per week]

X Tablets

**{Water Softening}**

Additive to soften [pool] water

Built-in water softener

Contains additive to create softer pool water

Creates softer pool water

Gives water a softer feel

Water Softener

**{END OPTIONAL MARKETING CONTENT}**