



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 21, 2021

Amy Toogood
Regulatory Specialist
Innovative Water Care, LLC
1400 Bluegrass Lakes Parkway
Alpharetta, GA 30004

Subject: Label Amendment – Application to Add Additional Marketing Claims and Revise First Aid Referral Statement.
Product Name: “AW38”
EPA Registration Number: 1258-1341
Received Date: June 15, 2021
Action Case Number/Decision Number: 00306420

Dear Ms. Toogood:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. Pursuant to 40 CFR 156.10(a)(6) you must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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 FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). 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, FIFRA section 12(a)(1)(B). 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.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Michael Varco by phone at 703-347-0403, or via email at Varco.Michael@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Fuller", with a horizontal line extending to the right.

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

Enclosure

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

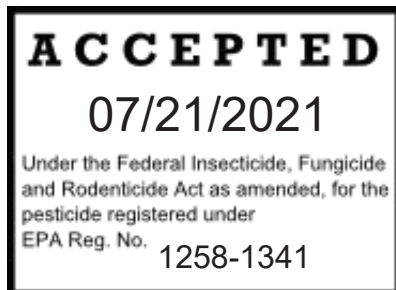
ACTIVE INGREDIENTS:

Trichloro-s-Triazinetrione 91.1%

Zinc sulfate monohydrate 3.5%

OTHER INGREDIENTS: 5.4%

TOTAL: 100.0%



KEEP OUT OF REACH OF CHILDREN

[MANTÉNGASE 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 product label.}

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

Read all Precautionary 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:

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.

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.

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] tablets¹ are formulated to protect against chlorine loss from sunlight, and can be used in feeders².] [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 algacide 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].]

[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.]

¹ 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.

² 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.

[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.]

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.

{BEGIN OPTIONAL MARKETING CONTENT}

{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][Inhibits][Kills][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}

[Added][Built-in][Contains a] clarifier [for crystal clear water]
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
With added clarifier [[and][&] [water] softener]

{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]



{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 dosage
Easy, economical, convenient to use
Easy to [use][dose]
Reduced maintenance formulation

{Filtration}

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

{General Marketing Language}

10,000 gallon pools



Bonus Pack

Ideal for pools 10,000 gallons and up



Ideal for pools
10,000 gallons
and up

Made in the USA



MADE IN THE
USA

Made in the USA of US and imported content.

Special formula



Value Pack

{Heritage Claims/Logos}
90 Years of Perfect Pools



[HTH] Pool [care]



[Here to Help] [since 1928]



HERE TO HELP
SINCE 1928

Pool [Care] Experts since 1928



{Long Lasting}

[1 [dose][treatment]] lasts up to 1 week



Chlorinates up to 1 week



Long lasting

{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.

{Pool Type}

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



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



For use in floater,
feeder and
skimmer

[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]



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

www.youtube.com/brand

www.facebook.com/brand

www.instagram.com/brand

www.pinterest.com/brand

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][preventer]

Contains stain preventing [additive][ingredient]

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

Helps prevent [from] [stains][staining] [and]& [scale][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}

Available Chlorine 83%
3" All-in-one Chlorinating [tablet][tab]
3" All-in-one [complete][comprehensive] sanitizer [tablet][tab]
83% available chlorine
91.1% active ingredient
[All-in-one][Complete][Comprehensive] sanitizer
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]
Sanitize [Treatment]



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}

[Built-in] sun protection
Contains built-in resistance to sunlight
Long Lasting Sunlight Protection



Provides sun defense [for pool water]
Stabilized for [extended][longer] chlorine life
Sun [protected][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}

{Testing}

Free App

[HTH]

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.

{Treatment}

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

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

[3"][3 inch] Tablet



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

Softens water

Water Softener

Proposed Alternate Brand Name(s):

HTH Pool Care Ultra 3" Chlorine Tabs

HTH Pool Care 3" Chlorine Tabs Ultra

Approved Alternate Brand Names:

90 Years of HTH Clear Pools Ultimate 3" Chlorinating Tablets
90 Years of HTH Perfect Pools Ultimate 3" Chlorinating Tablets
90 Years of HTH Pool Expertise Ultimate 3" Chlorinating Tablets
90 Years of HTH Pool Expertise 3" Chlorinating Tablets
HTH Advanced 3" Chlorinating Tablets
HTH Advanced All-in-One 3" Chlorinating Tablets
HTH Advanced All-Purpose 3" Chlorinating Tablets
HTH Advanced Choice 3" Chlorinating Tablets
HTH Advanced Max 3" Chlorinating Tablets
HTH Advanced Multi-Functional 3" Chlorinating Tablets
HTH Advanced Multipurpose 3" Chlorinating Tablets
HTH Advanced Total 3" Chlorinating Tablets
HTH Choice 3" Chlorinating Tablets
HTH Choice All-in-One 3" Chlorinating Tablets
HTH Choice Multi-Functional 3" Chlorinating Tablets
HTH Complete 3" Chlorinating Tablets
HTH Complete All-in-One 3" Chlorinating Tablets
HTH Complete Multi-Functional 3" Chlorinating Tablets
HTH Preferred 3" Chlorinating Tablets
HTH Preferred All-in-One 3" Chlorinating Tablets
HTH Preferred All-Purpose 3" Chlorinating Tablets
HTH Preferred Choice 3" Chlorinating Tablets
HTH Preferred Max 3" Chlorinating Tablets
HTH Preferred Multi-Functional 3" Chlorinating Tablets
HTH Preferred Multipurpose 3" Chlorinating Tablets
HTH Preferred Premium 3" Chlorinating Tablets
HTH Preferred Total 3" Chlorinating Tablets
HTH Ultimate 3" Chlorinating Tablets
HTH Ultra 3" Chlorinating Tablets

{END OPTIONAL MARKETING CONTENT}