



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 – Update Referral Statement Placement, Additional Marketing Content and Minor Revisions
Product Name: AW75
EPA Registration Number: 1258-1346
Received Date: June 21, 2021
Action Case Number: 00307242

Dear Amy 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 Wanda Henson by phone at (703) 308-6345, or via email at henson.wanda@epa.gov

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Fuller', with a long horizontal stroke extending to the right.

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

Enclosure

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}

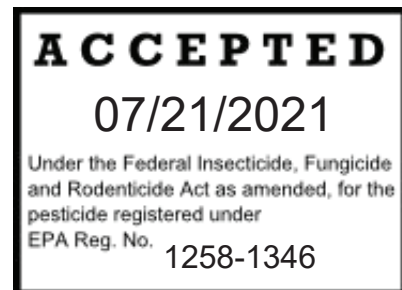
AW75

ACTIVE INGREDIENT:

Calcium Hypochlorite.....56%

OTHER INGREDIENTS:44%

TOTAL.....100%



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 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, and 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

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. 1258-1346

[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. Harmful if swallowed, absorbed through skin, or inhaled.

- [•] Open in a well-ventilated area. Avoid breathing dust and fumes.
- [•] Do not get in eyes, on skin, or on clothing. Do not handle with bare hands. Wear protective eyewear and use 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:

If product is exposed to small amounts of water, it can react violently to produce heat and toxic gases and spatter. Do not pre-mix or add water to this product. Only add this product directly to your [swimming pool][,][[or] spa][or skimmer].

- [•] Do not allow to become wet or damp before use.

Can react with other materials, including other water treatment products, to cause intense fire, explosion, and the release of toxic gases.

- [•] Keep all foreign matter, including other water treatment products, away from this product.
- [•] *{For use with resealable packaging.}* Use only clean, dry utensils to dispense this product.
- [•] *{For residential use:}* [Do not use this product in a floater or feeder.] *{For industrial, commercial or municipal use:}* [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. Before placing this product in a skimmer, make sure skimmer is completely clean and free of residue from other water treatment products.

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.

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 product 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 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.

[This product is a concentrated chlorinating agent.] [It is in a dry, free-flowing form.] [It kills bacteria, controls algae and destroys organic contaminants in pools [, spas and hot tubs].]

{Use 1: SWIMMING POOLS}**{Mass Channel}****{Sanitizer}****[WHY YOU SHOULD USE THIS PRODUCT:**

[This is an effective, multi-purpose sanitizer product that sanitizes, clarifies, and helps prevent algae.] [This enhanced formulation contains a built-in clarifier, water softener, and scale preventer.] [It is convenient, easy to use, and won't over-stabilize your pool.]]

{For Formulation containing Blue Dye}

[WHY YOU SHOULD USE THIS PRODUCT: This is an effective[, 7-in-1] sanitizer that provides brilliantly clear water, controls algae, clarifies water, dissolves fast, helps prevent stain and scale, softens water and provides Visible Blue Action, so you know it's working!]

{or}

[This is an effective sanitizer that provides brilliantly clear water, controls algae and clarifies water. This enhanced formulation contains a built-in clarifier, stain and scale preventer and water softener. [Finally, it provides Visible Blue Action, so you know it is working!]]

{Shock}**[WHY YOU SHOULD USE THIS PRODUCT:**

[This is a highly effective, [7-in1] [multi-purpose] [shock] product that works fast to [kill bacteria and algae] [and] restore crystal clarity to pool water within 24 hours],[reduce chlorine odor][won't fade liners][dissolve fast] [soften water] and [helps prevent stain and scale]. [It is convenient, easy to use, and won't over-stabilize your pool.]] [Finally, it provides Visible Blue Action, so you know it is working!]]

{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.]

{Dealer Channel}**[WHY YOU SHOULD USE THIS PRODUCT:**

[This product] [Product name] is an effective, [multi-purpose] [shock] [sanitizer] product that [works fast] [destroys bacteria and algae] [contains a filter aid] [softens water] [provides scale control] [and] restores crystal clarity to pool water [sanitizes], [clarifies], [helps] prevent[s] [kills] algae and [shock treats your pool]. [It is convenient, easy to use, and won't over-stabilize your pool.]] [And] [Its unique color-change technology shows when it's working.]

[For best results, follow a weekly program with our [brand] System. 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.] [For crystal clear pool water, follow the [brand] 3 step pool care program: Step 1: Sanitize [It], Step 2: Shock [It] Step 3: Defend [It].]

[WATER BALANCE:]

[Adjust and maintain total alkalinity from 60 to 100 parts per million (ppm), pH from 7.2 to [7.6][7.8], 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 for each product and allow each product to dissolve and disperse before adding additional products to the pool.]

{Mass Channel }

[[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 }

[Take a pool water sample to your [brand] dealer frequently to test for water balance. Maintain free available chlorine between 1 - 4 ppm.]

{or}

[Adjust and maintain pool water to recommended ranges:

Acceptable Range for Balance	
Total Alkalinity	60-100 ppm
pH	7.2-[7.6][7.8]
Calcium Hardness	Above 200 ppm
Available Chlorine	1-4 ppm

NOTE: Follow label directions for each product and allow each product to dissolve and disperse before adding additional products to the pool. Always check and adjust total alkalinity before adjusting pH levels. [Use a test kit [or test strips] that measure[s] all these ranges.]]

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

{When contents are in a resealable container:} [Use only a clean, dry [scoop] [lid] to measure this product].

[Do not use the [scoop] [lid] for any other purpose.]

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

DO NOT use in floater or feeder.

[[METHOD FOR DOSING DIRECTLY INTO POOL:]

Add the recommended dosage of this product [during evening hours] while the filter pump is running. When adding this product to your pool, broadcast the product evenly over a wide area in the deepest part of the pool. If any granules settle to the bottom of the pool, use brush to disperse until completely dissolved.] [Undissolved granules may cause bleaching or other damage to pool surfaces.]]

[[METHOD FOR SKIMMER ADDITION:]]

[Use this method to avoid bleaching vinyl liner or paint.] Make sure that filter pump is on and properly recirculating through skimmer. Empty skimmer of all chemicals and/or debris. Contamination may cause an explosion or the release of toxic gases. DO NOT use this method when an automatic chemical dispensing device (e.g., feeder) is present. Pour this product slowly into skimmer, making sure that the material is drawn into the system at the same rate, DO NOT allow this material to accumulate as toxic gases may be generated.]

[Test free available chlorine residual with [a][brand] pool test kit [or test strips]. Do not enter pool until the free available chlorine residual is 1- 4 ppm.] **Re-entry into treated swimming pools is prohibited above levels of 4 ppm chlorine for risk of bodily injury.**

[OPENING YOUR POOL:

Balance pool water per levels in WATER BALANCE section. Add a shock dosage of this product. Repeat dosage, as needed, until the free available chlorine residual is 1–4 ppm. Follow label directions for each of these products.]

{Sanitizer Directions}**ROUTINE CHLORINATION:**

[For [Wading Pools], [Splasher Pools] [and] [Kiddie Pools]:]

[Throughout the pool season, add 0.14 oz [(3/4 teaspoons (tsp))] [(#¹ bag[s]²)] of this product per 200 gallons of pool water daily or as often as needed to maintain chlorine residual at 1-4 ppm.]

[For small pools less than 5,000 gallons:] [For pop-up pools:]

[FOR UNSTABILIZED POOLS: [Add 0.35 oz [(2 teaspoons (tsp))] [(# bag[s])] of this product per 500 gallons of pool water daily or as often as needed to maintain the free available chlorine residual at 1 – 4 ppm. FOR STABILIZED POOLS: Add 0.2 oz [(1 1/4 tsp)] [(# bag[s])] per 500 gallons every other day or as often as needed to maintain the free available chlorine residual at 1-4 ppm.]

[For pools up to 10,000 gallons:] [For pop-up, above ground and/or inground pools:]

[FOR UNSTABILIZED POOLS: Add 0.7 oz [(1 ½ tablespoons (Tbsp))][(4 teaspoons (tsp))] [(# bag[s])] of this product per 1,000 gallons of pool water daily or as often as needed to maintain the free available chlorine residual at 1 – 4 ppm. FOR STABILIZED POOLS: Add 0.4 oz [(2 ½ teaspoons (tsp)] [(# bag[s])] per 1,000 gallons every other day or as often as needed to maintain the free available chlorine residual at 1-4 ppm.]

¹ Single use bag sizes may vary from 1 oz to 32 oz. The value for # will be calculated using the following formula:

$$\# = \text{dosage (oz)} / \text{bag size (oz)}$$

For instance, if a 1 oz bag is used, the 2 oz dosage will say “2 oz (2 bags)”. No partial bag dosages (e.g. 1 ½ bags) will be listed.]

² The word “bag[s]” may be substituted with other single use packing such as “pouch[es]”, “pod[s]”, or “pack[s]”.

[For pools 10,000 gallons and larger:]

[FOR UNSTABILIZED POOLS: Add 7 oz [(# bag[s])] of this product per 10,000 gallons of pool water daily or as often as needed to maintain the free available chlorine residual at 1 – 4 ppm.

FOR STABILIZED POOLS: Add 4 oz [(# bag[s])] per 10,000 gallons every other day or as often as needed to maintain the free available chlorine residual at 1-4 ppm.]

{charts are optional in whole or part based upon gallons for treatment}

[Use the following dosage recommendations based upon pool size.

Pool size, gallons	Dosage for unstabilized pools	Dosage for stabilized pools
500	0.35 oz [(2 tsp)] [(# bag[s])]	0.20 oz [(1 ¼ tsp)] [(# bag[s])]
1,000	0.7 oz [(1 ½ Tbsp)] [(# bag[s])]	0.4 oz [(2 ½ tsp)] [(# bag[s])]
2,500	1.75 oz [(3 ½ Tbsp)] [(# bag[s])]	1 oz [(2 Tbsp)] [(# bag[s])]
5,000	3.5 oz [(# bag[s])]	2 oz [(# bag[s])]
7,500	5.25 oz [(# bag[s])]	3 oz [(# bag[s])]
10,000	7 oz [(# bag[s])]	4 oz [(# bag[s])]
15,000	10.5 oz [(# bag[s])]	6 oz [(# bag[s])]
20,000	14 oz [(# bag[s])]	8 oz [(# bag[s])]
30,000	21 oz [(# bag[s])]	12 oz [(# bag[s])]

{Shock Directions}

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.]

[For [Wading Pools], [Splasher Pools] [and] [Kiddie Pools]:]

[Every 7 days, or as necessary to prevent pool problems, shock treat / superchlorinate the pool by adding 0.24 oz [(1 ½ teaspoons (tsp))] [(#³ bag[s]⁴)] of this product per 200 gallons of water.]

[For small pools less than 5,000 gallons:] [For pop-up pools:]

[Every 7 days, or as necessary to prevent pool problems, shock treat / superchlorinate the pool by adding 0.6 oz [1 1/4 tablespoons (Tbsp)] [(# bag[s])] of this product per 500 gallons of water.]

[For pools up to 10,000 gallons:] [For pop-up, above ground and/or inground pools:]

[Every 7 days, or as necessary to prevent pool problems, shock treat / superchlorinate the pool by adding 1.2 oz [(# bag[s])] of this product per 1,000 gallons of water.]

[For pools 10,000 gallons and larger:] [For above ground and/or inground pools:]

[Every 7 days, or as necessary to prevent pool problems, shock treat / superchlorinate the pool by adding [1 pound] [(# bag[s])] of this product per 13,500 gallons of water.]

[Additional shock treatments may be required to correct problems such as unpleasant odors, eye irritation due to pool water and visible algae, as well as problems caused by high bathing loads, heavy wind and rainstorms.]

{Chart may be used in whole or part based upon gallons for treatment. Single use bag sizes may vary from 1 oz to 32 oz. In the table below, the value for # will be calculated using the following formula:

= dosage (oz) / bag size (oz)

³ *Single use bag sizes may vary from 1 oz to 32 oz. The value for # will be calculated using the following formula:*

= dosage (oz) / bag size (oz)

For instance, if a 1 oz bag is used, the 2 oz dosage will say “2 oz (2 bags)”. No partial bag dosages (e.g. 1 ½ bags) will be listed.}

⁴ *The word “bag[s]” may be substituted with other single use packing such as “pouch[es]”, “pod[s]”, or “pack[s]”.*

AW75

EPA Reg. No. 1258-1346

EPA Draft Label dated 2020-09-22

For instance, if a 1 oz bag is used, the 2 oz dosage will say "2 oz (2 bags)". No partial bag dosages (e.g. 1 ½ bags) will be listed.}

[Use the following dosage recommendations based upon pool size.

Pool size, gallons	Dosage[, ounces]
500	0.6 oz [(# bag[s])]
1,000	1.2 oz [(# bag[s])]
2,000	2.4 oz [(# bag[s])]
2,500	3.0 oz [(# bag[s])]
3,000	3.6 oz [(# bag[s])]
4,000	4.8 oz [(# bag[s])]
5,000	6.0 oz [(# bag[s])]
6,000	7.2 oz [(# bag[s])]
7,000	8.4 oz [(# bag[s])]
7,500	9.0 oz [(# bag[s])]
8,000	9.6 oz [(# bag[s])]
9,000	10.8 oz [(# bag[s])]
10,000	12 oz [(# bag[s])]
12,500	15 oz [(# bag[s])]
15,000	18 oz [(# bag[s])]
17,500	21 oz [(# bag[s])]
20,000	24 oz [(# bag[s])]
30,000	36 oz [(# bag[s])]

]

[ALGAE CONTROL:

Add a shock dosage of this product as close as possible to any algae on the sides or bottom of the pool. If necessary, repeat the treatment. To optimize treatment and prevent possible staining or bleaching, immediately after treatment, thoroughly clean pool by brushing surface of algae growth and disperse any granules on the bottom of the pool.]

[For preventative algae control: Add a shock dosage weekly. [However, if problems persist use your preferred [brand] algaecide product regularly. Follow label directions on [the algaecide] {or} [that product.]]

{When product is sold in single use 1 lb. bags, the final printed label will use "32 oz. (2 bags)" or just "32 oz." When product is sold in container sizes allowing for 36 oz. dosing, then the final printed label will use "36 oz. [(# bag[s])]"}. For instance, the final printed label of a 12 oz. bag would say "36 oz. (3 bags)" or just "36 oz." No partial bag dosages (e.g. 1 ½ bags) will be listed.}

[WINTERIZING:

Gradually add [32 oz.][36 oz.] [(# bag[s])] of this product per 10,000 gallons of pool water that is clear and clean. Run the filter pump until granules are completely dissolved. Cover the pool with a pool cover. Prepare the heater, pump and filter components for winterizing by following manufacturer's directions.]

{Use 2 Spas & Hot Tubs}

{Sanitizer}

[WHY YOU SHOULD USE THIS PRODUCT:]

[This is an effective, multi-purpose sanitizer product that sanitizes, clarifies, and helps prevent algae. It is convenient, easy to use, and won't over-stabilize your spa.] [This enhanced formulation contains a built-in clarifier, water softener, and scale preventer.] [It is convenient, easy to use, and won't over-stabilize your spa.]

{For Mineral Brilliance Chlorinating Granules}

[WHY YOU SHOULD USE THIS PRODUCT:]

[This is an effective, [7-in-1] sanitizer that provides brilliantly clear water, controls algae, clarifies water, dissolves fast, helps prevent stain and scale, softens water and provides Visible Blue Action, so you know it's working!]

{or}

[This is an effective sanitizer that provides brilliantly clear water, controls algae and clarifies water. This enhanced formulation contains a built-in clarifier, stain and scale prevents and water softener. [Finally, it provides Visible Blue Action, so you know it is working!]]

{Shock}

[WHY YOU SHOULD USE THIS PRODUCT:]

[This is an effective, [7-in-1] [multi-purpose] [shock] product that works fast to [kill bacteria and algae] [and] [restore crystal clarity to spa water within 24 hours],[reduce eye irritation due to pool water and chlorine odor][won't fade liners][dissolve fast] [soften water] and [helps prevent stain and scale]. [It is convenient, easy to use, and won't over-stabilize your spa.] [Finally, it provides Visible Blue Action, so you know it is working!]]

[For crystal clear spa water, follow our [Brand B] 3-Step Program: Step 1: Balance, Step 2: Sanitize, and Step 3: Shock.]

{Dealer Channel}

[WHY YOU SHOULD USE THIS PRODUCT:]

[This is an effective, [7-in-1] [multi-purpose] [shock] product that works fast to [kill bacteria and algae] [and] restore [crystal] clarity to spa water [overnight] [within 24 hours]. [This fast-dissolving product] [This product] [Product name] will [reduce eye irritation due to pool water and chlorine odor] [and] [soften water]. It will help prevent stain and scale and won't fade liners. [It is convenient, easy to use, and won't over-stabilize your spa.]] [And] [Its unique color-changing technology turns blue when it's working.]]

HOW TO USE: [Do not pre-mix this product before adding it to your spa. Only add this product directly to your spa.] [Use only a clean, dry [scoop] [lid] to measure this product. Do not use the [scoop] [lid] for any other purpose.]

Add the recommended dosage of this product while the filter pump is running. Scatter the product over the surface of the water. If any granules settle to the bottom of the spa, use brush to disperse.

Test free available chlorine residual with a spa test kit. Do not enter spa until the free available chlorine residual is 3-5 ppm. **Re-entry Into treated spas is prohibited above levels of 5 ppm for risk of bodily injury.**

[WATER BALANCE:]

[For best product performance, comfort, and [crystal] [clear] [clean] water: Maintain total alkalinity in the range of 60 to 100 parts per million (ppm). Maintain pH in the range of 7.2 to [7.6][7.8]. Maintain calcium hardness above 200 ppm. Always check and adjust total alkalinity before adjusting pH levels.] [Use a test kit that measures all these ranges.] Use [brand] Spa Care Products to make adjustments. Follow label directions for each product and allow each product to dissolve and disperse before adding additional products to the spa.]

{Mass Channel}

[[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}

[Take a spa water sample to your [brand] dealer frequently to test for water balance. Maintain free available chlorine between 3 – 5 ppm.]

{or}

[WATER BALANCE: For best product performance, comfort and crystal clear water, use [brand] spa care products to maintain the following water balance:

Acceptable Range for Balance	
Total Alkalinity	60 - 100 ppm
pH	7.2 - [7.6][7.8]
Calcium Hardness	Above 200 ppm
Available Chlorine	3 - 5 ppm

Note: Follow label directions for each product and allow each product to dissolve and disperse before adding additional products to the spa. Always check and adjust total alkalinity before adjusting pH levels. [Use a test kit [or test strips] that measure[s] all these ranges.]]

[OPENING YOUR SPA [OR HOT TUB][Freshly Filled]]: Add 0.6 oz [(1 1/4 tablespoons (Tbsp))][[#⁵ bag[s]⁶]] of this product for each 500 gallons of water. Repeat dosage as needed until the free available chlorine residual is 3-5 ppm.

[ROUTINE CHLORINATION: Add 0.6 oz [(1 ¼ Tbsp)] [# bag[s]] of this product per 500 gallons of water, daily or as often as needed to maintain the free available chlorine residual at 3-5 ppm.]

[[SHOCK TREATMENT][/] [SUPERCHLORINATION]: After each use, shock treat with 1.8 oz [(3 1/2 Tbsp)] [# bag[s]] of this product per 500 gallons of water, to control odors and algae. Repeat as needed. [Water soluble, non-filterable wastes can accumulate in spa or hot tub water and cause dull or cloudy water and can stimulate algal growth.] [Superchlorination] [Shock treatment] must be done on a regular basis to remove these wastes and maintain clear sparkling water.]

[FOR PREVENTATIVE ALGAE CONTROL: Add a shock dosage weekly. However, if problems persist use your preferred [brand] [spa] algaecide product regularly. Follow label directions on that product.]

⁵ Single use bag sizes may vary from 1 oz to 32 oz. The value for # will be calculated using the following formula:

= dosage (oz) / bag size (oz)

For instance, if a 1 oz bag is used, the 2 oz dosage will say “2 oz (2 bags)”. No partial bag dosages (e.g. 1 ½ bags) will be listed.]

⁶ The word “bag[s]” may be substituted with other single use packing such as “pouch[es]”, “pod[s]”, or “pack[s]”.

[EXTENDED NON-USE PERIOD: During extended non-use periods when the unit is not being used add 1/2 oz [(1 tablespoon (Tbsp))] [(# bag[s])] of this product per 500 gallons twice a week with the circulation system running or as needed to maintain 3-5 ppm free available chlorine.]

[It is recommended that spas and hot tubs be drained every 30-90 days, more often under heavy use. Consult manufacturer's recommendations concerning the compatibility of chlorine sanitizers with their equipment. Some oils, lotions, fragrances, cleansers, or other contaminants may cause foaming or cloudy water and may react with chlorine sanitizers to reduce their efficacy.]

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}

Do not contaminate food or feed by storage or disposal or cleaning of equipment.

Pesticide Storage: 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.

Container Handling and Disposal: 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. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE "EMERGENCY HANDLING".

{Refillable container – non-household/residential use}

Do not contaminate food or feed by storage or disposal or cleaning of equipment.

Pesticide Storage: 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.

Container Handling and Disposal: Refillable container. Refill this container with calcium hypochlorite 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. To clean the container before final disposal, fill the container about 10 percent full with water. Agitate vigorously or recirculate with the pump for 2 minutes. Follow pesticide disposal instructions for rinsate disposal. Repeat procedure two more times. Offer rigid container for recycling if available or reconditioning if appropriate or place in trash. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE "EMERGENCY HANDLING".

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][Eliminates][Inhibits][Kills][Prevents][Wipes out] [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

{Claims specific to Alternate formula that contain a blue dye}

Advanced formula
Blast bacteria with a burst of blue!
Blue color indicates active shock treatment
Blue color indicator
Blue shock indicator
Burst of blue leads to clearer, cleaner water
Burst of blue on impact shows it's working
Burst of blue shows cleaning action
Changes color to show it's working
Color change shows it's working
Color-changing technology indicates active shock treatment
Features color-changing technology [to show it's working]
Product turns blue in water
Shockingly blue
Shockingly blue cleaning action
Turns blue in water[!]
Turns blue on impact with water
Turns blue to show its working
Turns blue when activated in water
Turns blue when shock activates
Unique formula [that] turns blue in water
Unique formula with blue shock indicator
Visible action – turns blue in water[!]
Visible Blue Action][so you know it's working!
Visible Action Granules [See it work]

{Clarifier}

[Added][Built-in] clarifier for crystal clear water
[Built-in][Contains a][With [added][extra]] clarifier
Cal Hypo for visibly [sparkling][brilliant][clearer] water
Clarifier
Clarifies [pool][spa] water
Clarifies, softens water and protects against scale formation
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][spa] water
For crystal clear, sparkling blue water
Includes clarifying agent
Keeps [pool][spa] water clean [and][&] crystal clear
Maintains brilliantly clear water
Produces crystal clear water in 24 hours
Restore[s] crystal clarity to water

{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 violently to produce heat and toxic gases and spatter. Do not add water to this product. Only add this product directly to your [swimming pool][,][[or] spa][or skimmer].

{Ease of Use}

Convenient
Cut and pour {not applicable to pods}
Easy dosing[, pre-measured sachet]
Easy to use
Easy, economical, convenient to use
Economical
Pre-measured[, easy [dose][dosing]] [sachet]
Reduced maintenance formulation

{Eye Irritation}

Reduces eye irritation caused by swimming pool water

{Fast Acting}

Fast [acting][dissolving

Fast acting [and][&] fast dissolving



{Filter Aid}

[Provides a] Filter Aid

{General Marketing Language/Graphics}

10,000 gallon pools



Bonus Pack

Concentrated Formula

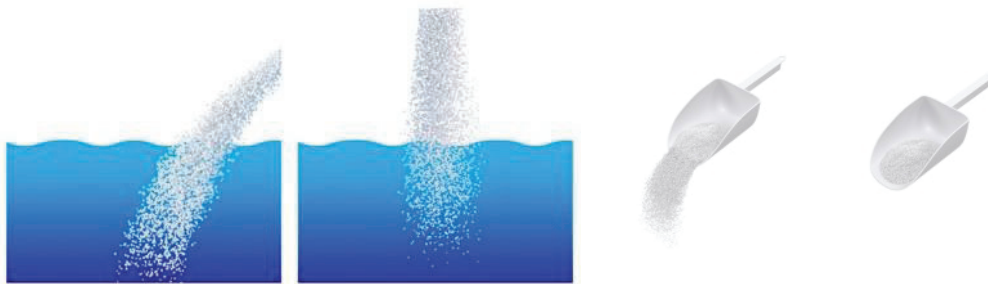
Concentrated, Fast Acting Formula

Ideal for pools 10,000 gallons and up



Ideal for pools
10,000 gallons
and up

[Granular][Granules]



Made in the USA



MADE IN THE
USA

Made in the USA of US and imported content.

Minimum Available Chlorine 52.5%



Special formula



Value Pack

{Heritage Claims/Logos}
90 Years of Perfect Pools



[HTH] Pool [care]



[Here to Help] [since 1928]



Learn more about Cal Hypo [power]
Pool [Care] Experts since 1928



{Kit Claims}

20,000 gallon pools



[20,000 gallons] Ideal for pools 20,000 gallons and up



Ideal for pools 20,000 gallons and up



Ideal for pools 20,000 gallons and up

For Opening / Closing Pool

[Open] [Close]



OPEN



CLOSE

Treats up to 20,000 gallons

{Multi-Benefit}

5-in-1 [Action] [Shock Treatment]] [Sanitizer]

6-in-1 [Action] [Shock Treatment]] [Sanitizer]

7-in-1 [Action] [Shock Treatment]] [Sanitizer]

8-in-1 [Action] [Shock Treatment]] [Sanitizer]

[All-in-one] [Shocks] [clarifies] [chlorinates] [sanitizes] [kills algae] [and][&]] [oxidizes]

Built-in clarifying, water softening, and scale protection additives

Chlorinating granules for multipurpose uses

[Multipurpose][All-in-One] sanitizer and shock treatment

[Multi-purpose][Multi-functional] sanitizer

{Odor}

Reduces chlorine odor

{Pack Description}

[Bonus Pack] [X] Bags of [brand name][Shock] {where "X" represents a number}

[Bonus [X] Pack] {where "X" represents a number}

[Brand name] [[X] x 1 lb.] [Bonus Pack] {where "X" represents a number}

[Special] [Value] [Bonus] [X] Pack {where "X" represents a number}

[Summer][X] [Pack][bonus pack] {where "X" represents a number}

[X] Bags of [brand name] {where "X" represents a number}

[X] convenient, pre-measured 1lb. bags {where "X" represents a number}

{pH Control}

Will not lower pH

{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 use][Ideal] [with] [for] all pool [surfaces][types]
[For use] [Ideal] [with] [for] all pool types [including vinyl-liner pools]
Good for all pool surfaces
Ideal for all pools, including vinyl-liner pools
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
Suitable for all pools

{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)

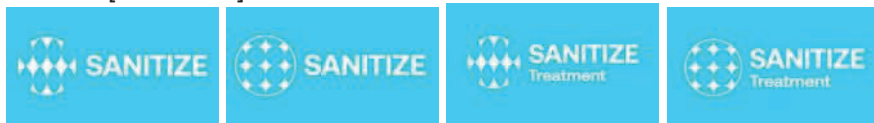


{Residue/Solubility/Scale}

Contains Scale Inhibitor
Contains stain and scale preventer
No fading of liner[s] when used as directed
Non-staining formula
Prevents scale formation
Prevents stains [and][&] scale
Protects against scale formation
Protects tiles and pool equipment
Scale Control Additive
[Won't][Will not] [fade liner when used as directed
[Won't][Will not] [cause staining] [or] [damage liners] when used as directed

{Sanitizer}

52.5% available chlorine
56% active ingredient
All-in-one sanitizer
Chlorinating granules for [multiple] [pool] [[and][&]] [spa] [use[s]]
Concentrated granular [chlorinator][sanitizer]
Convenient Routine Chlorinator
Provides effective chlorination [at an economical price]
Provides [chlorination][sanitization]
Requires daily treatment
[Routine] Sanitizer [for chlorine pools][for chlorine spas]
Sanitize [Treatment]



Sanitizer
Sanitizes for [brilliantly] clear water
Sanitizes [pool] [spa] water
Swimming pool sanitizer

{Scan Here Icons and Text}



Scan here for all details

{Shock}

All-in-one weekly chlorine boost
[Boosts][Restores] cleanliness [[and][&] hygiene]
[Cal Hypo] Shock [Treatment]



Dry, free-flowing form
Effective shock [and][&] oxidizer
Fast-acting – [shock to] swim [ready] in 15 min
For weekly use
Increases chlorine levels quickly
Multi-functional shock treatment
Oxidizer
[Powerful] [All-in-one [weekly]][Complete] shock treatment
Shock
Shock to swim [ready][safe] in 15min
Shock Treatment [[and][&]] [Superchlorinator] for [Swimming Pools] [and] [Spa[s]]
Special shock formula
Swim ready in 15mins
Weekly chlorine treatment

{Spa Type}

Ideal for spa use

{Stabilization}

Cal Hypo [formula] prevents chlorine lock



Cal Hypo [Power] No Chlorine Lock



[CYA] [Cyanuric acid][-]free
Does not contain [CYA] [cyanuric acid]



No Cyanuric Acid (CYA), no risk of Chlorine Lock
No Cyanuric Acid (CYA), prevents Chlorine Lock
No Cyanuric Acid (CYA), avoids Chlorine Lock
No CYA stabilizer, no Chlorine Lock
[No risk of][Eliminates risk of] Prevents][Will not cause] [chlorine lock][over stabilization][overstabilization]

{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}



{for shock treatment directions}

HTH Spa™ 3 Step System:

[Step] [1] [Balance]

[Step] [2] [Sanitize]

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

Enhance

Prevent

[Brand or poolife®] 3-Step System:

[Step] 1 [Sanitize It!]

[Step] 2 [Shock It!]

[Step] 3 [Defend It!]

{Graphic renderings of the 3 steps:}



{for routine chlorination directions}



{for shock treatment directions}

{Test Strips}

[FREE] [Trial pack] [brand][product name] [test strips] [inside]
[Bonus Pack with] [X] [FREE] [brand][product name] [test strips] [inside] {where "X" represents a number}
[Bonus] [X count] [brand][product name] [test strips] [inside] {where "X" represents a number}
[X] FREE [brand][product name] [test strips] included {where "X" represents a number}

{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 bag [pouch][pod][pack] [delivers][treats] [5 ppm of chlorine] [in] [13,500 gallons]
1 lb. [delivers][treats] [5 ppm of chlorine] [in] [13,500 gallons]

1 bag [pouch][pod][pack] [delivers][treats] [4 ppm of chlorine] [in] [16,750 gallons]
1 lb. [delivers][treats] [4 ppm of chlorine] [in] [16,750 gallons]

Single use bag sizes may vary from 1 oz. to 32 oz. The number of gallons treated (X) is calculated using the following formula:

{If treating to 5ppm of chlorine}

[X gallons treated = bag size in ounces x 13,500 /16
So a 16 oz. bag would treat 16 x 13,500/16 = 13,500 gallons
And an 8 oz. bag would treat 8 x 13,500/16 = 6,750 gallons]

{If treating to 4ppm of chlorine}

[X gallons treated = bag size in ounces x 16,750/16
So a 16 oz bag would treat 16 x 16,750/16 = 16,750 gallons
And an 8 oz bag would treat 8 x 16,750/16 = 8,375 gallons]

{Water Softening}

Built-in [water] softener
Contains water [softener][softening additive]
Softens [and clarifies] water
With added [clarifier] [and][&] [water] softener

Proposed Alternate Brand Name(s):

HTH Pool Care Chlorine Granules Ultra
HTH Pool Care Ultra Chlorine Granules
HTH Pool Care Shock Ultra
HTH Pool Care Ultra Shock
HTH Pool Care Kit

Approved Alternate Brand Names:

90 Years of HTH Clear Pools Pool Care Kit for Opening/Closing
90 Years of HTH Clear Pools Pop-Up Pool Care Kit
90 Years of HTH Clear Pools Ultimate Mineral Brilliance® Chlorinating Granules
90 Years of HTH Clear Pools Ultimate Shock! Treatment
90 Years of HTH Perfect Pools Pool Care Kit for Opening/Closing
90 Years of HTH Perfect Pools Pop-Up Pool Care Kit
90 Years of HTH Perfect Pools Ultimate Mineral Brilliance® Chlorinating Granules
90 Years of HTH Perfect Pools Ultimate Shock! Treatment
90 Years of HTH Pool Expertise Pool Care Kit for Opening/Closing
90 Years of HTH Pool Expertise Pop-Up Pool Care Kit
90 Years of HTH Pool Expertise Ultimate Mineral Brilliance® Chlorinating Granules
90 Years of HTH Pool Expertise Ultimate Shock! Treatment
HTH Complete Blue shock treatment
HTH Complete shock treatment
HTH Opening & Closing Pool Care Kit
hth Pool Care Kit for opening/closing
HTH Pop-Up Pool Care Kit
HTH Ultimate Blue shock treatment
hth ultimate mineral brilliance chlorinating granules
HTH Ultimate shock treatment
hth ultimate shock! treatment
HTH Ultra Complete Shock Treatment
poolife Exclusive Pool Care Collection Blue Brilliance

{END OPTIONAL MARKETING CONTENT}