



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 14, 2023

Joanna Holcombe
Authorized Representative
Innovative Water Care, LLC.
1400 Bluegrass Lakes Parkway
Alpharetta, GA 30004
Electronic Transmittal: jholcombe@solenis.com

Subject: Label Amendment – Labelling Changes to First Aid, Directions for Use, and Marketing Claims
Product Name: IWC R1100
EPA Registration Number: 1258-1404
Received Date: 02/02/2023
Action Case Number: 00429299

Dear Joanna:

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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EPA Reg. No. 1258-1404
Action Case Number 00429299

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 Melanie Bolden by phone at (202) 566-0674, or via email at Bolden.Melanie@epa.gov.

Best,

A handwritten signature in cursive script that reads "Melanie Bolden for". The signature is written in black ink on a white background.

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

Enclosure

Note to reviewer:

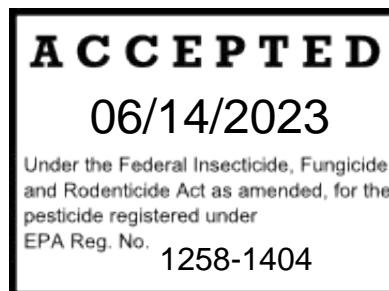
[Items in brackets [AAA] are optional and may/may not be included on final label]

{Items in braces {AAA} are for information purposes and will not appear on final label}

IWC R1100

Active Ingredients:

1-bromo-3-chloro-5,5-dimethylhydantoin	54.2%
1,3-dichloro-5,5-dimethylhydantoin	28.9%
1,3-dichloro-5-ethyl-5-methylhydantoin.....	15.9%
Other Ingredients:.....	1.0%
Total:.....	100.0%



Total Available Halogen as Bromine: 141%

[and/or]

Total Available Halogen as Chlorine: 62.8%

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

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

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.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes.

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 the 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, then give artificial respiration, preferably by mouth-to-mouth, if possible.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

IN CASE OF EMERGENCY CALL: 1-800-654-6911

See [side][back][right] [left] [panel][label] for additional Precautionary Statements

EPA Reg. No. 1258-1404

[Superscript Used in Lot Number]

EPA Est. No. Xxx-yy-zz

Net Weight: (as indicated on the container)

[Manufactured for:][Sold by:]

Innovative Water Care, LLC.

1400 Bluegrass Lakes Parkway

Alpharetta, GA 30004

[DOT Symbols]

[Country of origin (insert country)]

[Manufactured in (insert country)]

[Barcode]

IWC R1100

EPA Reg. No. 1258-1404

EPA Draft Label 2023-05-24

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: HIGHLY CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if swallowed. Do not take internally. Irritating to nose and throat. Avoid breathing dust. Use with adequate ventilation. Do not get into eyes, on skin or on clothing. Wear protective clothing, chemical resistant gloves and protective eyewear (goggles, face shield or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS

CHEMICAL HAZARD. STRONG OXIDIZING AGENT. Mix only with water. Use clean dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire or explosion. Contamination with moisture, organic matter, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases, and possible generation of fire and explosion. In case of contamination or decomposition, do not re-seal container. If possible, isolate container in open air or well-ventilated area. Flood with large volumes of water if necessary.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish.

{Note to reviewer: If container size is 50 lbs. or larger, the following statements will also be used:}

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination 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.

DANGER: Do not mix this product in concentrated form with any other chemicals. Do not add other chemicals to the feeding device when using this product. A violent reaction leading to fire and/or explosion could result.

Re-entry into treated [pools] [and] [spas] is prohibited above levels of 8 ppm due to risk of bodily injury.

Before draining a treated [pool], [spa], [hot tub], or [fountain], contact your local sanitary sewer and storm drain authorities and follow their discharge instructions. Do not discharge treated [pool], [spa], [hot tub], or [fountain] water to any location that flows to a gutter or storm drain or natural water body unless discharge is allowed by state and local authorities.

[SPA DIRECTIONS]

Outdoor hot tubs and spas must be covered when not in use.

[NOTE: Before using **[IWC R1100][this product][Product name]** in your spa or hot tub for the first time, add ½ ounce of sodium bromide per 100 gallons of water to establish a 30 ppm bromide concentration. Also, add sodium bromide at this dosage whenever the spa or hot tub is drained and refilled. The bromide addition ensures immediate establishment of an all-bromide system, eliminates chlorinous odors and maximizes skin and eye comfort.]

SPA OR HOT TUB START UP:

To start up a new spa or hot tub, or one recently drained, clean all surfaces, backflush or clean the filter, chemically balance the calcium hardness and total alkalinity, treat for metals if present (iron, copper and manganese), and adjust the pH to [7.2 to 7.8][7.2 - 7.8].

Using a suitable feeder adjusted according to the manufacturer's directions, add **[IWC R1100][this product][Product name]** to maintain an active bromine concentration of [2 to 4][2 - 4] ppm in residential spas and [3 to 6][3 - 6] ppm in commercial spas. Use a reliable test kit to monitor for bromine regularly.

[IWC R1100][This product][Product name] usage will typically vary from 0.015 to 0.10 pound for every 300 gallons of spa water to maintain the recommended bromine concentration range.

The presence of organic debris, high bather use and other factors may require a higher dosage.

SUPEROXIDATION:

Water soluble, non-filterable wastes can accumulate in spa or hot tub water and cause dull or cloudy water and can stimulate algal growth. Superoxidation or superchlorination with a suitable oxidizing shock treatment must be done on a regular basis to remove these wastes and maintain clear sparkling water. [Suitable oxidizing agents are those based on calcium hypochlorite, lithium hypochlorite, sodium hypochlorite or potassium peroxymonopersulfate.]

[POOL DIRECTIONS]

This product is not for use in outdoor pools.

TO START UP A NEW POOL, OPEN A POOL FOR THE SEASON OR CONVERT FROM A CHLORINE BASED PROGRAM:

Backflush or clean the filter, chemically balance the calcium hardness and alkalinity and adjust pH to [7.2 to 7.8][7.2 - 7.8]. Superoxidate to obtain a residual of [10 to 20][10 - 20] ppm available bromine [[5 to 10][5 - 10] ppm available chlorine] as determined by a suitable test kit. Swimming may begin when the bromine level drops below 8 ppm.

[When the bromine level drops below [1 to 3][1 - 3] ppm, add 0.2 to 2.0 ounces of **[IWC R1100][This product][Product name]** per 1000 gallons daily, or as needed. Use a suitable [floater or] feeder device adjusted according to the manufacturer's instructions so as to maintain [1 to 3][1 - 3] ppm available bromine. Use a reliable test kit to monitor for bromine regularly. [When the bromine level drops below [1 to 3][1 - 3]ppm, add [this product][Product name] as needed.] Maintain the pool water pH between 7.2 and 7.8.

High temperatures, the presence of organic debris, high bather use and other factors may require more frequent treatments.

SUPEROXIDATION:

Water soluble, non-filterable wastes can accumulate in pool water and cause dull or cloudy water and can stimulate algal growth. Superoxidation or superchlorination with a suitable oxidizing shock treatment must be done weekly or bi-weekly, after extremely heavy bather loads or heavy rain storms. [Suitable oxidizing agents are those based on calcium hypochlorite, lithium hypochlorite, sodium hypochlorite or potassium peroxymonopersulfate.]

{Note to reviewer: For Nonrefillable Containers, Household/Residential Uses; Product is non-dilutable solid}

STORAGE AND DISPOSAL

Store in original container in areas inaccessible to children in a cool, dry, well-ventilated area. Do not store at temperatures above 100°F. Nonrefillable container. Do not reuse or refill this container. Discard empty container in trash or offer for recycling if available.

{BEGIN OPTIONAL MARKETING CONTENT}

Total available halogen content as bromine..... 141%

- Brominating disinfectant for hot tubs
- BROMINATING DISINFECTANT FOR [SPAS][,] [HOT TUBS] [AND] [POOLS]
- Brominating Sanitizer
- Creates soft water feel
- Disinfects pool water
- Disinfects indoor pool water
- Doesn't reduce pH or affect hardness
- Effective [indoor] pool sanitizer
- Effective spa sanitizer
- Fits all floaters
- For use in feeders and floaters
- Helps maintain bromine levels
- High level of active [halogen][bromine]
- Ideal for [spa] [/] [hot tub] sanitizing
- Ideally suited for floater type feeders
- Improved bather comfort
- Low dust tablets
- No bleaching of hair or bathing suits
- No chlorine odor
- Sanitizer
- Sanitizes [indoor] pool water
- [Very] low odor
- Tablet shape fits all floaters
- Works with inline or floating feeders

{Icons are representative, colors, fonts and outline shape are subject to match brand standards on the final printed label. Copy used with the icon can be interchanged with associated claims.}

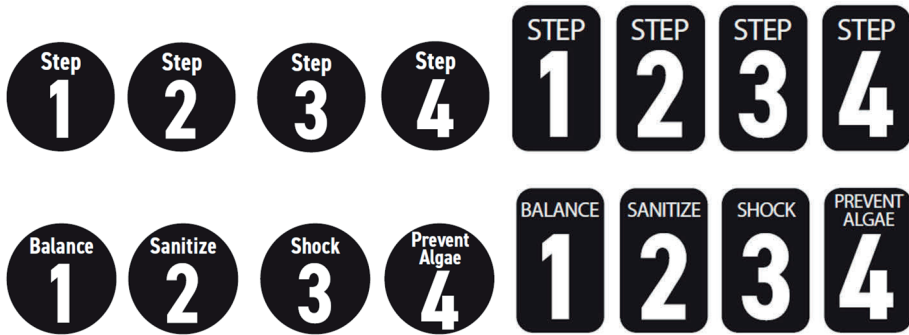


{Steps}

- Step 1: Balance
- Step 2: Sanitize *{sanitize would be the highlighted step}*
- Step 3: Shock
- Step 4: Prevent Algae

{Icons are representative, colors, fonts and outline shape are subject to match brand standards on the final printed label. Copy used with the icon can be interchanged with associated claims}





hth spa product guide
 Maintain
 Step 1
 Step 2
 Step 3
 Enhance
 Prevent

Step 2 – Maintain



Brand or POOLIFE] 3-Step System

{The “[Brand or POOLIFE] 3-Step System” below may be placed on the label to allow easy product identification by consumers.}

[Brand or POOLIFE] 3-Step System:

[Step] 1 [Sanitize [It!]]

[Step] 2 [Shock [It!]]

[Step] 3 [Defend [It!]]

{Graphic rendering of the above 3 steps}

{Icons are representative, colors, fonts and outline shape are subject to match brand standards on the final printed label. Copy used with the icon can be interchanged with associated claims.}



Questions about spa care or Spa Selections Products? Contact our customer helpline at 1-866-484-7665

Visit us online: www.SpaSelections.com

Visit: [hthpools.com][www.PoolBreeze.com] [www.Poolife.com] [www.GLBPool.com]
[www.LeisureTimeSpa.com] [www.PristineBlue.com] [www.SironaSpaCare.com] [www.Baquacil.com]
[www.appliedbio.net] [www.cchpoolcare.com] [www.pulsarsystems.net] [www.constantchlor.com]

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

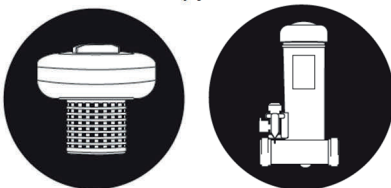
{Icons are representative, colors, fonts and outline shape are subject to match brand standards on the final printed label. Copy used with the icon can be interchanged with associated claims.}



{Equipment - Floater, Feeder}

[BRAND] [Product Name] Feeder[s]
[BRAND] [Product Name] Floater[s]
[For] [Use with] [BRAND] Floater[s],[,][and][&][or] [BRAND] Feeder[s]
[For] [Use with] [Product Name] Floater[s],[,][and][&][or] [Product Name] Feeder[s]
[For] [Use with] Floater[s],[,][and][&][or] Feeder[s]
[For] [Use with] [BRAND] Feeder[s]
[For] [Use with] [Product Name] Feeder[s]
[For] [Use with] Feeder[s]
Feeder[s]
Floater[s]
[BRAND] Floater[s] | [BRAND] Feeder[s]
[Product Name] Floater[s] | [Product Name] Feeder[s]
Floater[s] | Feeder[s]

{Icons are representative, colors, fonts and outline shape are subject to match brand standards on the final printed label. Copy used with the icon can be interchanged with associated claims}





Testing}

Free App

[HTH]

Test to Swim™ [App]

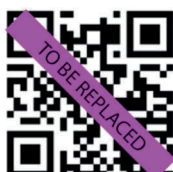
{Icons are representative, colors, fonts and outline shape are subject to match brand standards on the final printed label. Copy used with the icon can be interchanged with associated claims}



{QR Codes}



HERE TO HELP
SINCE 1928



POOL EXPERTS
SINCE 1928

{Stop Sign}



{Optional language for use on a kit label that contains this product:}

Simple Spa Care

Everything you need to take care of your spa

WELCOME TO [LEISURE TIME®] [Brand Name] SPA CARE

As a new spa owner, you'll love how easy [Leisure Time®] [Brand Name] products make caring for your investment. And if you've had a spa before, you'll appreciate how simple [Leisure Time®] [Brand Name] products are to use. After all, you want your spa to enhance your leisure time, not consume it.

Inside is everything you need to start up your spa and keep it running with clean, clear, luxurious water. Plus, there are test strips and a spa care guide included to help answer any questions you have about how to care for your spa water. With the [Leisure Time® spa Simple Spa Care® Program] [Program Brand Name], you'll spend more time in your spa than maintaining it!

LeisureTimeSpa.com

For more information on [this or other] [Leisure Time®] [Brand Name] products, please visit [our website at] LeisureTimeSpa.com.

{Brand Specific Marketing Content}

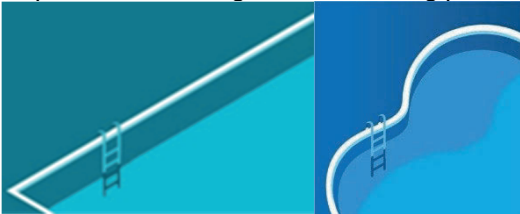
{Note to reviewer: Icons are representative, colors and fonts are subject to match brand standards on the final printed label.}



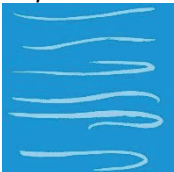
{Marketing Content Related to Pools/Spas/Hot Tubs}

{Note to reviewer: The following are representative images.}

Representative image of a swimming pool:



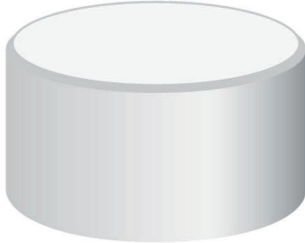
Representative image of pool/spa/hot tub water:



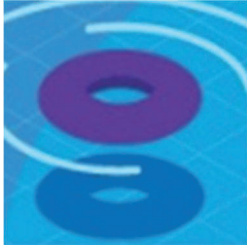
Representative image of a beach ball:



Representative image of a tablet:



Representative image of a floatie:



Representative image of flip-flops:



Representative images of people {Note to reviewer: Images of people in or near pools/spas/hot tubs WILL NOT depict application of this product. They are only in reference to use of a pool/spa/hot tub that has been treated according to label directions.}



[WHY YOU SHOULD USE THIS PRODUCT]

[[IWC R1100][This product][Product name] is a form of brominating hydantoin for [spas][,] [hot tubs] [and] [pools]. It is easily adapted to many erosion feeders [and floaters] used to automatically treat both commercial and residential [spas][,] [hot tubs] [and] [pools].]

When used as directed, [IWC R1100][This product][Product name] will disinfect [spa][,] [hot tub] [and] [pool] water, keeping it clean, clear and free of odor. [IWC R1100][This product][Product name] gives the effectiveness of chlorine without the chlorine odor. Proper sanitary practices require [changing spa water at a minimum of every [30][90] days] [and] [properly monitoring [[pool][spa]] water conditions.]

{Note to reviewer: The following is optional proprietary content}



{END OPTIONAL MARKETING CONTENT}