



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 21, 2023

Amy Toogood  
Product Regulatory Specialist for  
Innovative Water Care, LLC  
Electronic Transmittal: [atoogood@solenis.com]

Subject: Notification per PRN 98-10 – Adding Additional Brand Graphics  
Product Name: IWC R1100  
EPA Registration Number: 1258-1404  
Received Date: 11/18/2022  
Action Case Number: 00410095

Dear Amy Toogood:

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) 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. 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.

If you have any questions, please contact Jack Hall by email at [hall.john.j@epa.gov](mailto:hall.john.j@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Demson Fuller".

for Demson Fuller,  
Product Manager 32  
Regulatory Management Branch I  
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}

# IWC R1100

**[BROMINATING DISINFECTANT FOR [SPAS][,] [HOT TUBS] [AND] [POOLS]]**

[Step 2 – Maintain]

## 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. The signal word for this product is “DANGER”. The following components of this master label, at a minimum, will appear on the front panel of all distribution labels. If the distribution label has a single panel and multiple columns, these components will appear in the center column or in an immediately adjacent column: Product Brand Name, Ingredient Statement, Signal Word, Child Hazard Warning, First Aid Statement, Company Name and Address, EPA Registration Number, EPA Establishment Number.]

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

EPA Reg. No. 1258-1404

EPA Est. No. 6836-PA-01

Net Weight: *(as indicated on the container)*

[DOT Symbols]

[Country of origin *(insert country)*]

[Manufactured in *(insert country)*]

[Barcode]

[Manufactured for:]

ARCH CHEMICALS, INC.

1200 Bluegrass Lakes Parkway

Alpharetta, GA 30004

[Emergency Contact Number: ( \_\_\_\_\_ )]

IWC R1100

EPA Reg. No. 1258-1404

EPA Draft Label 2022-11-01

## NOTIFICATION

1258-1404

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:

06/21/2023

## **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.

### **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.

### **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.

### **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.

*{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.

*{Note to Reviewer/Subregistrant: If both nonrefillable and refillable container storage and disposal directions appear on the final label, a sticker must be added to the container stating if it is a nonrefillable or refillable container. Also, the following statement must be included directly above the storage and disposal directions on the final label:}*

See the sticker on the [front] [back] [side] [top] of the container to determine if it is nonrefillable or refillable.

*{Note to reviewer: For Nonrefillable Containers, Commercial/Industrial/Institutional Uses, Product is non-dilutable solid}*

## **STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Keep container tightly closed. Store in a cool, dry, well-ventilated place. Do not store in direct sunlight. Do not store at temperatures above 100°F.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to the label instructions contact your State pesticide or environmental control agent or the hazardous waste representative at the nearest EPA regional office for guidance.

**CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container.

### ***{Metal and plastic containers:}***

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate or burn if allowed by State and local authorities. If burned, stay out of smoke. If not tripled rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state, and federal regulations.

### ***{Metal containers only:}***

DO NOT cut or weld metal containers.

### ***{Fiber drums and liners:}***

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Offer for recycling, if available or dispose of liner and drum in a sanitary landfill or incinerate if allowed by State and local authorities.

### ***{Bulk Bag/Super Sack Container:}***

Completely empty bag into application equipment by shaking and tapping sides and bottom to loosen clinging particles. If not emptied in this manner, the bag may be considered an acute hazardous waste and must be disposed in accordance with local, state and federal regulations. When completely empty, offer for recycling if available or dispose of bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### ***{Tote Container:}***

Empty tote container must be returned to a tote collection agent.

*{Note to reviewer: For Refillable Containers, Commercial/Industrial/Institutional Uses, Product is non-dilutable solid}*

## **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal. Refillable container. Refill this container with *(this product)* only. Do not reuse this container for any other purpose. Cleaning before refilling is the responsibility of the refiller.

### ***{Metal and plastic containers:}***

Attach tamper evident devices [seals] to all openings, except vents, and return to *the manufacturer* for refilling.

### ***{Tote Containers:}***

Empty tote container must be returned to a tote collection agent.

### ***{Plastic drums and liners:}***

Attach tamper evident devices [seals] to all drum openings, except vents, and return the drum to *the manufacturer* for refilling.

**PESTICIDE STORAGE:** Keep container tightly closed. Store in a cool, dry, well-ventilated place. Do not store in direct sunlight. Do not store at temperatures above 100°F.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to the label instructions contact your State pesticide or environmental control agent or the hazardous waste representative at the nearest EPA regional office for guidance.

**FINAL CONTAINER DISPOSAL:** Cleaning the container before final disposal is the responsibility of the person disposing of the container.

### ***{Metal and plastic containers:}***

To clean the container before final disposal empty remaining contents from container for use according to use directions and triple rinse promptly after emptying. Triple rinse (or equivalent).

### ***{Tote Containers:}***

To clean the container before final disposal empty remaining contents from container for use according to use directions and triple rinse promptly after emptying. Triple rinse (or equivalent). For additional container disposal information, contact product supplier.

### ***{Plastic drums and liners:}***

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Offer for recycling, if available or dispose of liner in a sanitary landfill or incinerate if allowed by State and local authorities.

## **[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 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 days] [and] [properly monitoring [[pool][spa]] water conditions.]

## **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.

## **[SPA DIRECTIONS]**

**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]

### 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 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. 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: The following is considered optional marketing content:}

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

- [Brominating disinfectant for hot tubs]
- [Brominating Sanitizer]
- [Creates soft water feel]
- [Disinfects pool water]
- [Doesn't reduce pH or affect hardness]
- [Effective pool sanitizer]
- [Fits all floaters]
- [High level of active [halogen][bromine]]
- [Ideal for [spa] [/] [hot tub] sanitizing]
- [Ideally suited for floater type feeders]
- [Improved bather comfort]
- [IN CASE OF EMERGENCY CALL: 1-800-654-6911]
- [Low dust tablets]
- [No bleaching of hair or bathing suits]
- [No chlorine odor]
- [Sanitizer]
- [Tablet shape fits all floaters]
- [Very] low odor]
- [Works with inline or floating feeders]



{or}



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

[

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

]





[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}



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

[Visit us online: [www.SpaSelections.com](http://www.SpaSelections.com)]

[Spa Selections and the Spa Selections logo are trademarks of Lonza or its affiliates]

**{Scan Here Icons and Text}**



[Scan here for all details]

{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® SPA CARE

As a new spa owner, you'll love how easy Leisure Time® products make caring for your investment. And if you've had a spa before, you'll appreciate how simple Leisure Time® 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, you'll spend more time in your spa than maintaining it!]

[LeisureTimeSpa.com]

[For more information on [this or other] Leisure Time® 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.}



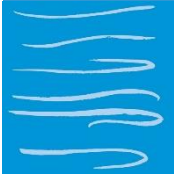
**{Marketing Content Related to Pools/Spas/Hot Tubs}**

{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 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.}





Representative images of animals in or near a pool



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

