



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 18, 2020

Debbie Schaub
General Administrator
Qualco, Inc.
225 Passaic Street
Passaic, NJ 07055

Subject: Notification per PRN 98-10 – Additional Marketing Claims
Product Name: ALL-IN-ONE CHLORINATING TABLETS
EPA Registration Number: 3525-146
Application Date: October 1, 2019
Decision Number: 557842

Dear Ms. Schaub:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Wanda Henson at (703) 308-6345 or via email at henson.wanda@epa.gov

Sincerely,

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

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

All-In-One Chlorinating Tablets

[[Select marketing claims and graphics from “Marketing Claims/Graphics” section below]]

Active Ingredient:

Trichloro-s-Triazinetrione 93.5%
Copper Sulfate Pentahydrate* 1.5%

Other Ingredients 5.0%

Total 100.0%

Available Chlorine 84%

*Metallic copper equivalent: 0.38%

Keep Out Of Reach of Children
[MANTENGASE FUERA DEL ALCANCE DE LOS NIÑOS]
DANGER [PELIGRO]

Contamination or improper use may cause fire or 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. *{The following optional statement is for use on residential swimming pool and spa products:}* [Do not mix this product with a small amount of water. Only add directly to your pool or spa.] Do not remove floater or other dispensing device from water for more than five minutes if it contains a tablet or tablet residue.

{Note to reviewer: Although this product has a “DANGER” signal word, as per the EPA Label Review Manual “The Agency may permit reasonable variations in the placement of the First Aid statement as long as the reference statement, “See First Aid (or Statement of Practical Treatment) on (identify appropriate panel)” appears on the front panel.” If the First Aid Statements are placed on the front panel of the final graphic label, the statement below will only refer to the Precautionary Statements:}

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

Sold by:
Qualco, Inc.
225 Passaic Street
Passaic, NJ 07055

[Brand name(s)] are [registered] trademark[s] of Qualco, Inc.

NOTIFICATION

3525-146

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:

02/18/2020

EPA Reg. No. 3525-146
EPA Est. 3525-NJ-1
[Superscript Used in Lot Number]
Net Weight: _____

{Left [Right] [Back] [Side] Panel}

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes irreversible eye burns and skin irritation. May be fatal if inhaled. Harmful if swallowed.

- Do not get in eyes, on skin or on clothing. Wear safety goggles or face shield and rubber gloves when handling this product. For additional skin protection, wear long sleeves and long pants.
- Thoroughly wash with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.
- Open in a well-ventilated area. Do not breathe dust or vapor.
- Remove and wash contaminated clothing before reuse.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

If on Skin or Clothing: Take off contaminated clothing. Immediately rinse skin 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: Immediately call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For medical emergencies call your poison control center at 1-800-222-1222.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

In Case of Transportation Emergency Call Chemtrec at 1-800-424-9300.

Physical or 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. Add only 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 with a skimmer, make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in the skimmer.
- Strong oxidizing agent. This product can increase fire intensity.
- Keep away from heat, flame and burning material (like a lighted cigarette).

{Environmental hazards statement for containers less than 5 gallons (liquid) or 50 pounds (solid, dry weight) use first sentence; 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 into sewer systems without previously notifying the local sewage treatment plant authorities. 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 the Precautionary Statements Before Use.

[This product is designed to dissolve slowly, providing a steady source of available chlorine and copper in swimming pools to control the growth of algae, kill bacteria and destroy organic contaminants.]

{All except 8 ounce slow dissolving sticks/tablets, 28 ounce supertabs, cartridges, disposal floater, universal floater:}

Method of Application: Use in a floating dispenser, automatic chlorinator or feeder designed for this product, or place in skimmer.

{8 ounce slow dissolving sticks/tablets; replaces above:}

Method of Application: Use only for skimmer chlorination. Do not use in a floating dispenser, automatic chlorinator or feeder. Run the filter pump a minimum of eight hours daily.

{28 ounce supertabs; replaces above:}

Method of Application: [Brand] are supersized for extended cleaning power. These convenient and easy to use tablets are formulated to protect against chlorine loss in direct sunlight and are used in skimmer gaskets. They are designed to dissolve slowly providing a steady source of available chlorine (up to 2 [two] weeks) for complete swimming enjoyment in your pool.

{Disposable floater containing 1" tablets only; replaced above:}

Method of Application: [Brand] Disposable Floaters are designed for simple one time use and treat up to 40,000 gallons of pool water. The 1" tablets inside the floater are formulated to protect pool water against chlorine loss and dissolve slowly providing a steady source of available chlorine for complete swimming enjoyment in your pool.

{Universal floater cartridge containing 1" tablets; replaces above:}

Method of Application: [Brand] Refillable Floaters are convenient and easy to use, treating up to 40,000 gallons of pool water. The 1" tablets inside the floater are formulated to protect pool water against chlorine loss and dissolve slowly providing a steady source of available chlorine (up to 1 [one] month) for complete swimming enjoyment in your pool.

[Use the [Brand] floater or feeders [made by [Brand]]. In a clean pool with no visible algae, follow the feeder instructions. Make sure cartridge is completely clean and free of residue from other water treatment products before putting this product in the cartridge.]

Do not allow this product to get damp or wet before use. Do not allow this product to contact other water treatment products. [Use in a new chlorinating device or any device which has previously contained only this product or trichloro-s-triazinetrione.] When [if] placed in the skimmer, run the filter pump a minimum of 8 [eight] hours daily.

[For crystal clear pool water, follow our 4- [Four-] step pool care program: **Step 1:** Test and balance pool water; **Step 2:** Sanitize; **Step 3:** Shock at least once a week; and **Step 4:** Add algaecide as directed.]

[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.]

Do Not use in floaters or feeders that have been used with other water treatment products. Make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in the skimmer.

- Do Not** throw tablets [or sticks] directly into pool.
- Do Not** permit tablets [or sticks] to contact plastic pool linings or metal objects.
- Do Not** use with any *other* tablets [or sticks] in the same skimmer, floater or metal objects.
- Do Not** use in any chlorinating device which has been used with other chlorinating compounds.
- Do Not** use bare hands when handling product.
- Do Not** mix with other products or dissolve before use.
- [Do Not pre-mix this product.] [Only add this product directly to your pool.]**

Water Balance: To provide optimum product performance, swimmer comfort and crystal clear water always maintain pH from 7.2 to 7.6, total alkalinity from 80 to 120 parts per million (ppm) and calcium hardness above 200 ppm. Test frequently using a [Brand] test kit that measures all these ranges. Make any necessary adjustments promptly with the appropriate [Brand] pool care products. Re-entry into treated pools is prohibited with chlorine levels above 4 ppm due to risk of bodily injury.

{Alternate "Water Balance" language:}

[Water Balance: For best product performance, swimmer comfort and crystal clear water, use [Brand] pool care products to maintain the following water balance:

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

Follow label directions for each product and allow each product to dissolve and disperse before adding additional products to the pool. Use a [Brand] test kit that measures all these ranges. Re-entry into treated pools is prohibited with chlorine levels above 4 ppm due to risk of bodily injury.]

Routine Chlorination:

{3 inch tablets:}

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

{1/2 ounce 1" tablets:}

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

{8 ounce sticks/tablets:}

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

{8 ounce slow dissolving sticks/tablets:}

Add one stick [tablet] per 5,000 gallons of pool water every 2 [two] weeks or as often as needed to maintain a chlorine residual at 1-4 ppm.

{The following paragraph is common to all except Disposable Floater, Universal Floater Cartridge and 28 ounce Supertabs product designs:}

Follow "Method of Application". This dosage may vary depending upon bather load, water temperature and other conditions. Pool must not be entered until the chlorine residual is 1-4 ppm as measured with a reliable test kit.

{28 ounce Supertabs:}

Ensure that the skimmer basket is free of any other chemicals, tablets or residue prior to use. Place this product in the skimmer basket. Make sure skimmer basket is completely free of residue from other water treatment products before putting this product in the skimmer. This product is not recommended for use in vinyl-lined pools without an automatic timer on the pool pump. Pump should run a minimum of 8 [eight] hours per day, otherwise vinyl liner damage may occur. 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.

{Disposable floater containing 1" tablets:}

Do not attempt to open or refill this cartridge. Do not completely submerge cartridge. Do not mix with other products or dissolve before use.

1. To provide optimum product performance, swimmer comfort and crystal clear water, always maintain pH from 7.2 to 7.6, total alkalinity from 80 to 120 parts per million (ppm) and calcium hardness above 200 ppm. Test frequently using a reliable test kit that measures all of the above ranges. Adjust with appropriate product.
2. Shock treat with appropriate product [Brand]. Follow label directions.
3. If water is unstabilized, stabilize with appropriate product [Brand]. Follow label directions.
4. This product is marked in gallon increments from 5,000 to 40,000 gallons. To use this cartridge, punch out all feeder holes on both sides of cartridge up to and including the one corresponding to your pool's size. If pool is between sizes marked, punch out next higher hole. Make sure holes are punched out to allow free water flow through cartridge.
5. Punch out vent holes on both sides of cartridge. Place cartridge in pool. An eyelet has been provided on the cartridge so that you may secure it in the middle of the deep end of the pool if you desire.
6. Maintain free chlorine residual between 1-4 ppm. If chlorine is too low, punch out an additional hole on each side of the cartridge. If the chlorine is too high, seal one hole on each side of the cartridge with waterproof plastic tape.
7. This cartridge will float on its side to indicate the need for replacement. **Do not attempt to open or refill this cartridge!**

{Universal floater cartridge containing 1" tablets:}

Use with [Brand] floater [feeders made by [Brand]]. In a clean pool with no visible algae, follow the feeder instructions. Make sure cartridge is completely clean and free of residue from other water treatment products before putting this product in the cartridge.

[For use in Floater:

1. Cut off the air vent that sticks out at top of cartridge.
2. Punch a hole through the lowest indentation on each side of the cartridge and insert into the floater. Do not punch holes in bottom. If more chlorination is needed, punch as many holes as needed on each side starting at the lowest indentation and working up, until the pool's free chlorine residual reaches 1-4 ppm.]

[For use in E-Z Chlor Feeder:

1. Do not cut off the air vent at the top of the cartridge.
2. Punch all indentations on the bottom of the cartridge. Two cartridges may be needed to treat a pool of 30,000 gallons or more.
3. Make sure that the screw lid is on tight.
4. Punch a hole through the lowest indentations on three sides of the cartridge.
5. Insert cartridge into feeder. If more chlorination is needed, punch more holes on each side of the cartridge starting at the lowest indentation and working up until the free available chlorine residual remains within the range of 1-4 ppm.]

[For use in Guardex Feeder:

1. Cut off the air vent that sticks up near the top of the cartridge.
2. Punch a hole through the lowest indentations up to watermark on three sides of the cartridge. Two cartridges may be needed to treat a pool of 30,000 gallons or more.
3. Insert the cartridge in the feeder, adjusting the cartridge height until the free available chlorine in the pool remains within the range of 1-4 ppm.]

[To Refill Cartridge:

1. Remove absorbent package from cartridge before reuse. This packet is not required for pool care.

2. Fill cartridge with 4 lbs. of [Brand] 1 inch tablets. DANGER – Use only [Brand] Dry Chlorinator Tablets.]

{All following items common to all product designs:}

Shock Treatment:

[As a preventative treatment, you must shock treat your pool once per week to prevent pool problems. In addition to weekly shock treatment, you must shock treat 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.]

Adjust pH to 7.2 to 7.4 [with [Brand] pH Plus -or- [Brand] pH minus -or- [Brand] pH adjusters] per label directions]. Shock treat weekly [with a product such as {Product Name} to kill bacteria, control algae, burn out organic material and to keep water sparkling clear. Follow label directions.

Algae Control: If pool surface develops algae or feels slippery, follow shock treatment directions. Immediately after shock treatment, thoroughly clean pool by scrubbing surface of algae growth, vacuum and cycle through filter. If necessary, repeat the procedure. Pool must not be entered until the chlorine residual is 1-4 ppm.

Opening Your Pool: Balance pool water, shock treat and stabilize your pool [using [Brand] Stabilizer and Conditioner]. Then follow “Routine Chlorination” directions.

[To Determine your Pool Capacity in U.S. Gallons Use the Appropriate Formula Below (use only measurements in feet):

Round: Diameter x Diameter x Average Depth x 5.9 = Total Gallons

Rectangular: Length x Width x Average Depth x 7.5 = Total Gallons

Freeform: Surface Area (Sq. Ft.) x Average Depth x 7.5 = Total Gallons

Oval: Maximum Length x Maximum Width x Average Depth x 5.9 = Total Gallons

{Household/residential use products – Nonrefillable containers:}

Storage and Disposal

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

Pesticide Storage: Keep this product 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:** Nonrefillable container; do not reuse or refill this container. Thoroughly rinse empty container 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”.

{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}

{Household/residential use products – Refillable containers:}

Storage and Disposal

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

Pesticide Storage: Keep this product 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:** Refillable container. Refill this container with only this product. Do not use this container for any other purpose. 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”.

{Non-household/residential use products – Nonrefillable containers:}

Storage and Disposal

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

Pesticide Storage: Keep this product in its tightly closed container when not in use in an area inaccessible to persons unfamiliar with its use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame.

Pesticide Disposal: Pesticide waste is 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 label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at your nearest EPA regional office for guidance. **Container Handling:** Nonrefillable container; do not reuse or refill this container. Thoroughly rinse empty container with water to dissolve all material prior to disposal. Offer for recycling if available; if not, dispose of in a sanitary landfill or by procedures approved by state and local authorities. For disposal of a contaminated or decomposing product see "Emergency Handling".

{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}

{Non-household/residential use products – Refillable containers:}

Storage and Disposal

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

Pesticide Storage: Keep this product in its tightly closed container when not in use in an area inaccessible to persons unfamiliar with its use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame.

Pesticide Disposal: Pesticide waste is 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 label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at your nearest EPA regional office for guidance. **Container Handling:** Refillable container. Refill this container with only this product. Do not use this container for any other purpose. Cleaning this container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. Thoroughly rinse empty container with water to dissolve all material prior to disposal. Then offer for recycling, if available; if not, dispose of in a sanitary landfill or by procedures approved by state and local authorities. For disposal of a contaminated or decomposing product see "Emergency Handling".

Emergency Handling: In case of contamination of 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.

{Marketing Claims/Graphics}
{All Products:}

Stabilized [and/or Sun Protected] for Extended Chlorine Life
Stabilized Sanitization
Sun Resistant for Extended Chlorine Life
Protects against Bacterial and Algae
Prevents [Controls] Bacteria and Algae
Bacteria and Algae Control
Sanitizes Pool Water
Swimming Pool Sanitizer
Sanitizer for Swimming Pool and Pool Water
3-in-1 [Triple] Action: Sanitizes, Prevents Algae and Clarifies Water
2-in1 [Dual] Action: Sanitizes and Prevents Algae
Kills Bacteria and Destroys Organic Contaminants
Kills Algae
Totally Soluble
Slow Dissolving
Precipitating Agent Included
Assists Filtration
Filter Aid
Multipurpose Tablet
Keeps Pool Water Clean and Crystal Clear
Produces Sparkling Clean Swimming Pool Water

Restores Clarity to Pool Water
Blue Crystals for Algae Protection
Power Crystals Clarify Pool Water
Clarifies Pool Water
Contains a Clarifier
For Crystal Clear [Sparkling] [Blue] Pool Water
Chlorine Lasts [Chlorinates] Up to One Week
Regulates Chlorine Levels
Convenient 1 [One] Week Dosage
Innovative, Patented Exclusive Technology
84% Available Chlorine
Concentrated Chlorinator for Routine Use
Individually Wrapped for Easy Handling {except 1" tablets}
Easy, Economical, Convenient to Use
For Routine Use in Automatic Feeders, Floaters and Plastic Skimmers
1 [One] Tablet [Stick] Treats 10,000 Gallons {except 1" tablets}
Good for All Pool Surfaces
For Pop-Up Pools
Step 1: Balance Step 2: Sanitize Step 3: Shock Step 4: Prevent Algae
4 [Four] Free Tablets
Bonus [Value] Pack
[Now] 4 [Four] More Weeks of Sanitizer
1 [One] Extra Month of Tablets
[Now] Treats 40,000 More Gallons of Water
Extra Value
Extra 1.75 Pounds Free
__% More Free
Now __ lbs.
Stabilized Chlorinator

{8 ounce slow dissolving sticks/tablets:}

1 [One] Stick [Tablet] Treats 5,000 Gallons
Controlled Release
Slow Dissolve
Controlled Delivery System
Controls Erosion Rate of Product
Multi-Action Sticks [Tablets]
Prevents Algae
Chlorinates up to 2 [Two] Weeks
Convenient 2 [Two] Week Dosage
Extended Sanitization for up to 14 Days
Softens Water
Protection for Pool Surfaces and Equipment
Gentle on Equipment and Liners
Will Not Cause Bleached Liners
Corrosion Inhibitor
Prevents Metal Staining and Corrosion
Sequestering Agent
Reduces Scale Formation
Enhanced Filter Performance
Only for Skimmer Use

{28 ounce Supertabs:}

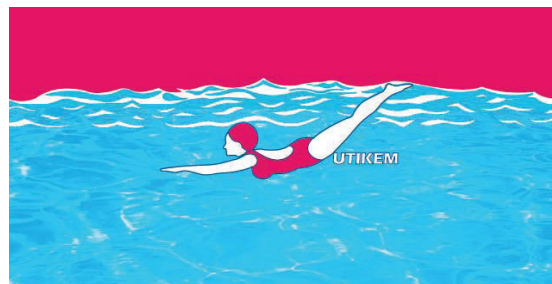
Chlorinates up to 2 [Two] Weeks
Convenient 2 [Two] Week Dosage

{Disposable floater containing 1" tablets:}

Can Last up to 1 [One] Month
Convenient 1- [One-] time Use
Tilts when Empty
Treats up to 40,000 Gallons

{Universal floater cartridge containing 1" tablets:}

Can Last up to 1 [One] Month
For Use with Trichlor Products
Treats up to 40,000 Gallons



{End of Marketing Claims/Graphics}

[] Denotes alternate/optional verbiage

{ } Denotes verbiage not printed on market labeling